

June 2019

Draft Local Plan 2017-2036 Regulation 18



Summary of Responses

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Appendix A – Photos of Advertisements and Consultation Events (drop in sessions)

Appendix B - Summary of Responses

2. Introduction

- 2.1 Thank you to everyone who responded to the consultation on the Draft Local Plan (regulation 18 stage, 5 February to 19 March 2019). The Council received many responses and a wide variety of views.
- 2.2 This document summarises the responses received and is published alongside all the full responses. It also considers feedback given at consultation drop in sessions, and next steps for the Local Plan.
- 2.3 It is prepared to feed back to those who responded to the consultation and attended drop in sessions and give an update on the Local Plan.
- 2.4 In total, 1254 responses were received during the consultation on the Draft Local Plan, which has resulted in 2080 individual comments.
- 2.5 The summaries of responses received are grouped by Policy/Site Allocation/Section of the Draft Local Plan, and are presented in Appendix B. It is recommended that this covering document is read prior to reading the summaries, particularly Section 4 Key points to note.

3. How to view the documents

- 3.1 This document and all the responses received to the consultation are available on the Council's website at www.easthants.gov.uk/draft-local-plan.
- 3.2 Further detail on how to navigate the publication of all the responses is available in Section 8.
- 3.3 If you cannot view documents online, please contact us to discuss alternative arrangements.

4. Key points to note

- This document provides a general summary of the responses received for each Policy/Site Allocation/Section of the Draft Local Plan. It does not describe how those comments have informed an updated version of the Local Plan. This information will be available when the next iteration of the Local Plan is prepared (Regulation 19 stage).
- All comments received have been read, and key points noted. Not all the individual points raised are included in the summaries. The summaries identify key themes raised and the general level of support for each.
- The references in this document (e.g. policy numbers, sections etc) refer to the Draft Local Plan 2019. This document (including a glossary) remains available on the Council's website at www.easthants.gov.uk/draft-local-plan.
- The value of the comment relates to its content, rather than how many times it has been said. One response raising relevant material planning considerations can result in amendments to the next iteration of the plan. This summary therefore does not quantify the number of comments received raising particular points.
- Many responses were submitted on behalf of land owners/site promoters. These generally are long, detailed and technical. Whilst key points have been picked up in the summaries where possible, Appendix B does not provide an individual identifiable summary of the information provided by the site promoter.
- The summaries present the information as received – for example, comments have not been amended in terms of their factual accuracy. Therefore, if a summary is considered not to be factually correct, it is simply that it is a summary of the comment received. The Council will verify information accordingly where required as part of the ongoing Local Plan process.
- No qualification of the comments has been added. I.e. a comment may be factually incorrect, but there has been no qualification or validation of that in the summaries. The text in Appendix B represents the comments received. There is no added commentary from the Council.
- The Council must operate within the General Data Protection Regulation (GDPR). For this reason, the names of individuals who have responded to the consultation are not published. See Section 8 for more information.
- If you responded to the consultation on the Draft Local Plan, you will not automatically be alerted of future consultations. This is due to GDPR. See Section 12 if you wish to be kept informed.
- This document does not list new site suggestions received during the Call for Sites. This information will be included in the next iteration of the Land Availability Assessment (LAA).

5. Feedback from Local Plan consultation events (“drop-in sessions”)

5.1 Ten drop-in sessions were held during the six-week consultation period where all members of the local community were invited to attend to find out more about the Draft Local Plan. At the drop-in sessions, material was presented on display boards with hard copies of all supporting documents (including the evidence base and background papers) made available. Planning officers supported by other Council officers attended the events to answer questions.

5.2 Details of the ten drop-in sessions and the number of people who attended are below:

Venue	Date and time	Attendance
Ropley Parish Hall	Tuesday 5 February 2019 15:30 – 20:30	86
Alton Maltings	Saturday 9 February 2019 10:00 – 14:00	185
Barton Hall, Horndean	Wednesday 13 February 2019 15:30 – 20:30	99
Bentley Memorial Hall	Friday 15 February 2019 15:30 – 20:30	83
Barton Hall, Horndean	Saturday 23 February 2019 10:00 – 14:00	77
Rowlands Castle Parish Hall	Monday 25 February 2019 15:30 – 20:30	64
Forest Community Centre, Bordon	Thursday 28 February 2019 15:30 – 20:30	63
Millennium Centre, Liphook	Wednesday 6 March 2019 15:30 – 20:30	75
Medstead Village Hall	Friday 8 March 2019 15:30 – 20:30	114
Alton Maltings	Friday 15 March 2019 15:30 – 20:30	125

5.3 The questionnaire supporting the consultation offered the opportunity to feedback on the drop-in events and consultation process. A small number of respondents offered feedback.

5.4 General feedback on drop in sessions:

- Helpful, and a good availability of knowledgeable officers
- Appreciated the clear responses from the officers present
- Useful to have these events
- Useful to see larger format maps
- Not enough officers available at the first Alton drop in sessions
- Documents were intimidating in their size, presentation and detail
- The banners were vague and presented with nice wording that most people could not disagree with

5.5 How future consultations could be better:

- Improve the online response system
- Make it possible to comment on Land Availability Assessment
- Make it clearer how to comment
- Reduce planning jargon
- Councillors should be available at drop in sessions
- Provide maps to take away
- Improve advertising of events
- Extend consultation period as so much material to read
- Include video/infographic information to explain how documents support the plan
- Make use of a communications expert
- Make spare tables available at drop in sessions for visitors to write notes/comments
- Increase the size of site reference numbers on maps

5.6 The Council will consider the comments that have been made for future Local Plan consultations and events.

6. The responses

6.1 In total, 1254 responses were received, which has resulted in 2080 individual comments. A single response may address many parts of the plan, of which each count as an individual comment.

6.2 These comments are split across the many sections, sites and policies of the plan. However, some parts of the plan attracted proportionately a higher number of responses. These are primarily proposed Site Allocations; SA21 Land at Northbrook Park, Site SA23 Land north of Wolf's Lane, Chawton and Site SA2 Chiltley Farm, Liphook.

7. Summary of the responses

7.1 The summary of responses is presented in Appendix B. Please consider the Key points to note (Section 4) prior to reading these summaries.

8. Publication of the responses

8.1 All the responses received are available on the Council's website at www.easthants.gov.uk/draft-local-plan. These are grouped into five main categories:

- Statutory Consultees
- Town and Parish Councils
- Organisations and Groups
- Developers/Planning Agents
- Individuals

- 8.2 Statutory consultees include neighbouring councils (including the South Downs National Park Authority), county councils, and key environmental bodies and infrastructure providers (such as, the Environment Agency, Natural England, Historic England and Portsmouth Water). The name of the group/organisation is published, but the name of the individual and any contact details are not.
- 8.3 The responses from individuals are grouped by the letter of the individual's first name. Any submissions from 'Mr and Mrs' are grouped in 'M', and any by 'Dr' are grouped in 'D'.
- 8.4 The ID reference number of each rep is published. If you wish to know your ID number, please contact us. However, as with this process of publication, and in relation to providing ID numbers, the Council must ensure it is operating within GDPR. It is for this reason that names have not been published, and confirmation of ID may be required when requesting ID reference numbers.

9. Call for sites (Land Availability Assessment)

- 9.1 Alongside the consultation on the Draft Local Plan, the call for new site suggestions was re-opened. Additional site suggestions were received for a variety of land uses. Information was also received about LAA sites to amend site boundaries and provide up to date information about availability. This information informs the Land Availability Assessment (LAA) and will be made public when an updated LAA is published alongside the next iteration of the Local Plan (see Section 11 Next steps for more information).

10. Raising the profile of the consultation

- 10.1 The Council took many steps to inform the local community of the consultation. This ranged from briefing key local groups (such as town and parish councils) so they could cascade information to local people and groups, to advertising the consultation on bus shelters, social media, newspapers, posters and banners in public places.
- 10.2 At each event we asked people arriving how they had found out about the event. At Alton, primarily people attending had heard about the event from the newspaper, e-newsletter and social media. E-newsletter and word of mouth generally featured predominantly at other places. From discussions and recording this information, it is worth noting that many people found out about the consultation and the events from 'email alerts' from the Council and from notifications and 'word of mouth' from other organisations. This cascading of information has proved a useful mechanism to publicise the consultation.
- 10.3 Examples of how the consultation was publicised and photos from the consultation events are shown in Appendix A.

11. Next steps

- 11.1 Preparation of a Local Plan requires consideration of a lot of information and dialogue with many organisations, groups and people. Many responses were received during this consultation, particularly on some of the big decisions we need to make around large development areas (i.e. where, when and how much development).
- 11.2 The Council has decided to carry out further consultation on all potential large-scale development areas, to gather further information and ensure local communities are engaged and aware from the early stages of planning for such sites. These are areas that could accommodate approximately 600 homes or more, and other supporting uses. This consultation will be a further Regulation 18 consultation (early stages) and will start towards the end of summer 2019.
- 11.3 The responses from the consultation on the Draft Local Plan (as summarised in Appendix B), and the responses to the forthcoming consultation on large-scale development areas will inform the next iteration of the Local Plan. A full version of the Local Plan will then be made available for public consultation (Regulation 19 stage) prior to being submitted to the Planning Inspectorate for examination.
- 11.4 An updated timetable for the preparation of the Local Plan (the Local Development Scheme) will be published prior to the start of the next Local Plan consultation.

12. How you can stay informed and involved

- 12.1 To stay informed about the preparation of the Local Plan, including future consultations, please sign up to receive 'email alerts' on the homepage of the Council's website at www.easthants.gov.uk.
- 12.2 If you responded to the consultation on the Draft Local Plan, you will not automatically be alerted of future consultations. This is due to GDPR. If you wish to be kept informed, you need to sign up for 'email alerts'. You can specify the type of alerts you wish to receive, so you only receive those you are interested in.

Appendix A – Photos of Advertisements



Bus shelter 04/02/19 – 16/03/19 at Normandy Street, Alton

**EAST HAMPSHIRE DISTRICT COUNCIL
PLANNING AND COMPULSORY PURCHASE ACT 2004
THE TOWN AND COUNTRY PLANNING (LOCAL
PLANNING) (ENGLAND) REGULATIONS 2012
REGULATION 18 - NOTICE OF CONSULTATION ON
THE SUBJECT AND SCOPE OF EAST HAMPSHIRE
NEW LOCAL PLAN**

In accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012, notice is hereby given that East Hampshire District Council is consulting on a draft new Local Plan.

East Hampshire District Council invites you to make representations in regard of the scope, subject and contents of the draft new Local Plan.

What is the new Local Plan?

The new Local Plan 2017-2036 provides a policy framework for planning and development for the areas of the district that lie outside the South Downs National Park.

The Local Plan:

- sets out a long-term vision and objectives;
- provides a strategy for growth, new homes, employment, facilities and infrastructure to meet the area's needs; and
- includes policies to manage change while protecting and enhancing the area's heritage and natural environment.

Once adopted the new Local Plan will replace the:

- Joint Core Strategy adopted 2014;
- Housing and Employment Allocations Document adopted 2016; and
- Saved Policies of the Local Plan Second Review adopted 2006.

This draft new Local Plan is available for public consultation for a period of six weeks between 5 February 2019 and 5pm 19 March 2019.

Consultation documents and comment forms can be found and completed online via the Council's consultation page at <http://www.easthants.gov.uk/draft-local-plan> and can be viewed at the <http://www.easthants.gov.uk/evidence-base>

Where possible comments should be submitted electronically via our online portal: <http://easthants.jdi-consult.net/localplan/>. Where this is not possible comments can also be emailed to localplan@easthants.gov.uk or posted to Planning Policy East Hampshire District Council, Penns Place, Petersfield, Hampshire, GU31 4EX

If you have any enquiries regarding the Regulation 18 Local Plan consultation, please email localplan@easthants.gov.uk or call 01730 234102 and a member of the Planning Policy Team will be able to assist.

Newspaper advertisement

(Statutory Notice 01/01/19 –
Herald Series)

**East Hampshire District Council
Planning and Compulsory Purchase Act 2004
The Town and Country Planning
(Local Planning) (England) Regulations 2012
Regulation 18 - Notice of consultation on
the subject and scope of
East Hampshire new Local Plan**

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If you have any enquiries regarding the Regulation 18 Local Plan consultation, please email localplan@easthants.gov.uk or call 01730 234102 and a member of the Planning Policy Team will be able to assist.

(Statutory Notice 31/01/19 –
The Hampshire Independent)

Appendix A – Photos of Consultation Events (“drop-in sessions”)



Alton Maltings 09/02/2019



Bentley Memorial Hall 15/02/2019



Millennium Centre, Liphook 06/03/2019



Medstead Village Hall 08/03/2019



Rowlands Castle Parish Hall 25/02/2019

Appendix B – Summary of Responses

Strategic Policies (pages 13 to 29)

Site Allocations (pages 30 to 53)

Development Management (DM) Policies (pages 54 to 61)

Chapters and Topics (pages 62 to 67)

Areas (pages 68 to 71)

Evidence Base (pages 72 to 79)

Appendices (pages 80 to 81)

References and abbreviations should be cross checked to the draft Local Plan 2019, and its glossary. The responses to the Questionnaire are included in the relevant parts, as listed above.

Strategic Policies

S1 Quanta and location of development	<p>There is general support for the policy, especially in terms of meeting the identified local housing needs and seeking to direct development to the most sustainable and accessible locations. The majority of comments were related to housing, although responses were also made to the other topics covered within the policy.</p> <p><i>Housing</i></p> <p>There were also mixed views in regard to proposed housing numbers. Many people considered increasing allocations above housing requirements was not needed, required further justification and noted that it should be acknowledged future revisions to the SDLP and Neighbourhood Plans will find further housing to meet needs, whereas other thought higher numbers were needed for flexibility.</p> <p>There were many comments on the use of the standard method. Whilst many believe it was the correct approach to be taken to assess local housing need, many responded that this is only the starting point and other factors should be factored in, such as the overwhelming need for affordable housing in the East Hampshire. Some considered the using the standard method did not meet objectively assessed needs. Other considered the standard method should not be used as affordability is artificially increased due to the presence of the National Park.</p> <p>Others considered the numbers too low and would not ensure choice and competition in the housing market, with emphasis that any targets should be viewed as a minimum. In particular, the development industry and those representing sites considered housing targets should be increased for a variety of reasons. This included issues such as; recognising historic under delivery; to restrict speculative development if the SDNP under-deliver; as well as support economic growth.</p> <p>Some considered housing targets should be increased in order to meet the unmet needs of the wider PUSH area and some considered the housing supply stated in the policy was unrealistic as lapse rates were not applied and windfall allowance over-estimated.</p> <p>Some considered specific targets should be made for affordable homes and specialist housing, whilst other felt the policy should have settlement specific targets for housing. Some respondents also considered Neighbourhood Plans should be given a specific housing target.</p> <p>There were mixed responses to the proposed locations of future development, with particular criticism of an allocation at Northbrook Park, and more consideration of increased growth at existing settlements and the southern parts of the</p>
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Authority. There were also mixed views on whether housing development should be located in existing settlement policy boundaries in the first instance.

Further comments relating to the location of development referred to disproportionate growth amongst various tiers of settlement hierarchy. Others felt smaller villages needed more growth, particularly in relation to affordable housing. There were numerous comments that there is an over reliance on large sites and more smaller sites should be allocated to conform with NPPF (para. 68).

Employment

There were a number of responses in regard to employment, with some considering the policy did not recognise no-strategic sites and there should be more emphasis on allocating smaller sites. Some comments considered more sites should be identified on brownfield land and also noted that allocations were too high in relation to the identified need established in the HEDNA.

There is support for the draft Local Plan recognising that local businesses need to expand. Employment sites should be strategically located and built prior to surrounding housing which is aimed to accommodate any future employees. This will encourage greater sustainable development by reducing the need to commute large distances.

Retail

Some respondents considered that retail completions and commitments that contribute to requirements should be quantified, as well as the requirement itself. Many respondents agreed that no new retail floorspace should be allocated and considered applications for new retail development should be considered positively whereby it supports economic growth and enhances shopping choice. There is some concern that retail growth was only being concentrated on existing centres and there should be consideration for small-scale retail development in other areas.

Gypsy, Travellers and Travelling Showpeople

Concern was raised over the need associated with traveller communities as some households had not been interviewed as part of the supporting assessment. It was advocated that sites for traveller communities should form part of wider housing allocations on large sites. There were a lot of comments on the proposed locations for traveller allocations, particularly the high concentrations in and around Four Marks.

	<p><i>Other</i></p> <p>A general comment in regard to Policy S1 was related to the plan as a whole, with a handful of respondents suggesting the plan period is extended by two years to take account of any potential slippage in plan preparation. Other general comments included an over reliance on green field sites and a greater examination needed on brownfield land.</p>
<p>S2 Managing land release via phasing</p>	<p>There is support for managed land release via phasing from a number of responses who considered it allowed the maintenance of housing land supply throughout the plan period to meet ongoing needs. Phasing sites allows improvements to supporting infrastructure, but it was considered any phasing should be flexible if sites do not deliver.</p> <p>Some responses considered delays should only be made to delivery where essential infrastructure projects would justify doing so and not enough work currently supports this, and more links need to be made to Policy 29: Infrastructure. These delays should form part of site specific allocation policies, not a strategic district-wide policy.</p> <p>The majority of objections came from the development industry and those representing sites. Many considered phasing sites was inconsistent with the Government’s objective of significantly boosting housing supply. It was considered allocated sites would already have been identified as sustainable and therefore, their delivery should not be arbitrarily restricted. Contrary to some responses of support, some felt phasing would undermine housing land supply and potentially risk failing the Housing Delivery Test.</p> <p>Many respondents were unclear how the LPA would resist development on sites proposed in the latter phases of the plan period. Some responses commented on the practicalities of phasing and suggested further information was needed on how applications will be dealt with when submitted within first phase.</p> <p>Some also considered a phased approach on individual sites will hamper the provision of site-related infrastructure, especially where this is expected to be delivered by developers. It was also suggested that sites to be delivered later in the plan period should only be reserve sites to be reviewed in future versions of the Local Plan.</p> <p>In regard to Alton, Four Marks and Rowlands Castle, some considered the reliance on a limited number sites could result in an early delivery of most of the required housing in the first identified phase and mean that there is then a lack of delivery in the second phase of the plan period (contrary to criterion ‘e’ of the policy).</p>
<p>S3 Sustainable and Viable development</p>	<p>There is some support for this policy. Comment was made that when considering viability of a development, the need for developers to build should be secondary to the impact that the development would have on the conurbation.</p>

	<p>Comment was made that Policy section S3.3 does not accurately reflect paragraph 11 of the NPPF. Attention is also drawn to paragraph 8 of the NPPF, and how this should be given due consideration when considering an ageing population and services. In addition, concern was raised that parts of Policy S3 may contradict Policy S2.</p> <p>Query about how support can be provided to the policy when the provision of infrastructure is unknown. Disagreement towards Policy section S3.5 was shared, as well as the view that it provides a 'get out' clause for developers.</p> <p>Concern was shared that the plan will not be effective as it is not thought deliverable over the timescales. Response also shared that the policy would dilute the standards expected in new developments, and consequently no negotiation should occur.</p> <p>Segregation in Liphook from the railway line and SDNP boundary was commented on, as well as in Horndean by the A3. When determining the size and need of local housing, it was recommended that the commuting trends to local and larger employment areas (e.g. London, Guildford and Southampton) are considered.</p> <p>Comment was also made to the need for global warming to be a greater driver of policy.</p>
S4 Health and Well Being	<p>There is support for this policy. Suggestions that health and wellbeing should be noted as a challenge facing East Hampshire. An ageing population should also be a challenge, specifically provision of suitable accommodation and access to community facilities.</p> <p>Suggested amendments have been made for this policy, particularly that reference is made to the 'Active Design Guidance' that is developed in partnership between Sport England and Public Health England. It is also suggested that Policy section S4.2 is deleted as it replicates other policies in the plan. Recommendation that the policy places greater emphasis on Green Infrastructure as well as incorporating air quality as an impact on health and wellbeing.</p> <p>The policy should also consider health inequalities, as opportunities of free or low cost physical activity and access to green space should be given to all. In conjunction, mental health needs to be taken into consideration in the plan, not just physical health.</p> <p>Consideration must be given as to how the NHS, particularly QA hospital, will cope with added pressures and demand created from increased housing in its catchment area.</p> <p>Enhanced footpaths should be utilised as a mechanism for encouraging walking and should be seen equally important as cycling.</p>

	<p>Less support for and available time to enjoy local sports clubs, due to increasing length of working days and commuting time. Concern also raised that loss of farmland to development causes more intensive farming process which has a negative impact on health and wellbeing.</p>
<p>S5 Housing mix and type</p>	<p>There is support for this policy. The policy will ensure the discreet needs of the locality are met. The policy criteria do not reflect why the policy is needed.</p> <p>Specific comment was made that Policy section S5.3 should state specific numbers expected, as well as questioning how the need for smaller houses is demonstrated.</p> <p>Recommendation that the findings of HEDNA should be incorporated in the policy. Comment was also made that a greater focus on housing being marketed to reflect the average salaries of local people. It is not thought appropriate to have self-build on large sites as it affects design, phasing and section 106 contributions.</p> <p>The policy should place greater emphasis on young and elderly people, particularly Extra Care Housing. Reference should also be made to the Gypsy and Traveller community, particularly including accommodation on larger sites (which has only been done for Northbrook Park).</p> <p>Suggestion that greater explanation is required as to why a community project worker is a requirement in Policy S5.5 and what the purpose of this position would be. Comments also stated that this should be a requirement, not optional.</p>
<p>S6 Affordable Housing</p>	<p>There is support for this policy.</p> <p>Response made that local needs should dictate the tenure type of affordable housing required and that it should be dispersed throughout developments.</p> <p>Suggestion that policy should incorporate a mechanism so that the amount of affordable housing cannot be retrospectively reduced once the development has commenced. In addition, the policy should also include a viability assessment and explicitly state that C2 use class is not applicable.</p> <p>In accordance with NPPF, recommendation was made that greater clarity should be provided on the mix of tenure and size of affordable housing, with an emphasis on there being a broad range. This could also be guided by the assessment of housing requirements in the 2018 HEDNA and conducted on a site by site basis.</p>

	<p>The policy should be strengthened in accordance with NPPF to ensure that the 10% affordable home ownership is to be part of the overall affordable housing contribution from the site and not 10% of the affordable housing offer.</p> <p>Due to housing associations being unable to obtain grant funding for affordable housing from S106 or other conditions, it is important that the Local Planning Authority ensures that the affordable housing is secured from each development, without unnecessary restriction.</p> <p>Contradiction was noted between the policy and HEDNA in relation to people accessing the housing waiting list or deemed as in need of affordable housing. It was also noted that the use of the statement “rented housing which is genuinely affordable” can lead to ambiguity and raises questions about whether it would be affordable to the public.</p> <p>Question raised as to what the justification is for increasing affordable housing in Whitehill & Bordon. Queries also raised as to when a viability assessment reduces the affordable housing provision to 10%, should this become shared ownership. Clarity also sought as to whether the threshold for affordable housing contributions of 11+ homes is net or gross.</p> <p>Specific amendments to wording and terminology have been suggested, as well as greater reference to the NPPF in certain parts of the policy.</p>
S7 Rural Affordable Housing	<p>There is support in principle for this policy.</p> <p>Critical comment was made that the maximum figure of 30%, relating to delivery of low cost market housing, is uninformed and instead a maximum amount should be determined per site by use of a viability statement. In addition, rural affordable housing should be allocated in the policy and that there is a need in Beech. Recommendation that low cost housing is defined as all dwellings sold below the average house price of the area.</p> <p>Suggestion that affordable housing should not be situated in areas of high landscape value or land protected by specific habitat regulations.</p> <p>Comment was made that it is not necessary to submit a viability statement for all exception schemes, as it is not always thought to be necessary and adds greater financial costs. Comments also stated that the NPPF does not require sequential testing for rural exception sites, therefore it should not be necessary for applicants to demonstrate that no other sites can accommodate this need.</p> <p>Recommendation that the policy is split into two separate policies, one for rural and another entry level exception sites as the latter is also permitted in urban areas.</p>

	<p>Objections towards the policy detailed that all development should be in the SPB, consequently S7.2.c should be removed or amended. Other amendments to wording and terminology have been suggested.</p>
<p>S8 Specialist Housing</p>	<p>There is support in principle for this policy. Comment was made that the policy should be enforced and state a targeted amount of specialist housing. Additionally, it is not considered appropriate to expect specialist housing on all allocated sites, instead the requirement should be determined for individual cases.</p> <p>Comments referred to increased clarity of the Use Class in the policy, relating to C2 and C3, and suggested that Use Class is not specified at all.</p> <p>Responses highlighted that as facilities would be provided on site, such developments do not need to be in a sustainable location. Comment was made that the design of the development should be in keeping with the surrounding area.</p> <p>Some revisions to wording and terminology have been suggested, specifically recommendations to alter S8.3. In addition, responses emphasised a need for defining terms, such as 'clearly defined need'.</p>
<p>S9 Gypsies, travellers and travelling showpeople accommodation</p>	<p>There is support for this policy, particularly point S9.1.d as will help tackle inequality of access to healthcare.</p> <p>Recommendations were received that the policy wording should be tightened so can be rigorously applied and properly enforced, but queries raised as to how this would be managed.</p> <p>Other comments were made that pitches/plots should use natural material, respect the dark night skies and that no commercial businesses should be located on the pitches/plots.</p> <p>Oppose sites being allocated in unsustainable locations in villages and the rural area. Grayshott should not need to take quota from other unmet areas, and that the policy could increase threat to the Grayshott/Headley gap.</p> <p>Recommendation was made that pitches/plots should be referred to instead of number of applications when detailing monitoring indicators. In addition, similar sites in the locality of an application should be considered when assessing the impact of an application.</p> <p>Concern was raised about the objectively assessed need for Gypsy, Travellers and Travelling showpeople being unmet. Concern at the level of shortfall and how it is being addressed (the policy does not fully explain how the shortfall will be</p>

	addressed). Suggestion for this to be monitored with other neighbouring local authority's shortfall and any unauthorised encampment.
S10 Safeguarding land for gypsy, traveller and travelling showpeople accommodation	<p>There is support in principle for this policy.</p> <p>Recommendation received to alter the supporting text of policy to ensure any wider unmet needs are accounted for, as well as referring to safeguarding of land if there is still a local need.</p>
S11 Residential Mobile Home Parks	<p>There is support in principle for this policy, specifically preventing the loss of mobile home sites and acknowledging the contribution they make towards the need for housing.</p> <p>Comment was made to suggest that sites suitable for Gypsy and Traveller accommodation should also be suitable for residential mobile home parks, as well as questioning how mobile home parks would be safeguarded.</p>
S12 New Homes in the Countryside	<p>There is some support for this policy, but there are also critical comments, and proposed amendments.</p> <p>Comment was made that the exceptions listed are generally repetitive of national policy and should be removed. The policy cross references Policy S17, which is thought to cause loss of clarity in both policies as well as potentially challenging to enforce. The policy should confirm if replacement dwellings are acceptable. The policy is restricted, negatively worded and goes beyond the NPPF, which only seeks to restrict isolated new homes. Not consistent with presumption in favour of sustainable development.</p> <p>The general support for gypsy/traveller accommodation is inappropriate as this kind of development does not need to be located in the countryside. Gypsy/traveller accommodation should only be provided within SPBs and on formally allocated sites.</p> <p>The use of farm land for all types of development should be restricted.</p>
S13 Planning for Economic Development	<p>There is support in principle for this policy.</p> <p>Concern was raised that the policy fails to consider existing employment sites that have not been allocated but wish to expand, emphasising that such employment sites could decline due to implementation of this policy and Policy S14.</p>

	<p>Multiple responses shared varying opinions regarding the location and potential expansion of businesses. Comment was made that proposed large commercial sites should only be developed in sustainable locations with suitable access arrangements to the highway. Specific comment was made that small employment land should be allocated in Bramshott & Liphook parish, e.g. Penally Farm, as it would provide opportunity for existing businesses to expand. Response noted that Policy S13.2.c does not allow existing rural employment sites to expand, which is also thought to contradict other policies in the Local Plan. Concern was raised that Policy S13.5 could possibly frustrate non-strategic employment business sites that have an aspiration to expand/grow.</p> <p>Comment was made that when considering allocated sites in the Local Plan, the peaceful character and amenities of Chawton village should be respected.</p> <p>Other comments referenced the need for Policy section S13.6 to also include medium and large business units, not just small.</p>
<p>S14 Maintaining and improving employment floorspace</p>	<p>There is support in principal for this policy.</p> <p>It was recommended that the policy should provide for all employment uses, not just those within Use Class B, thus consistently promoting flexibility towards meeting the employment needs as stated in the interim HEDNA. The policy should also recognise that lower quality premises are required to provide affordable accommodation.</p> <p>With regards to Policy S14.2 the marketing exercise is onerous and could result in being a barrier to appropriate non-employment uses, it is also suggested that marketing should be for 12 months.</p> <p>Policy section S14.4 is less supportive than the Joint Core Strategy policy, as that allowed rural businesses to expand. Where buildings are demonstrated to be unfit for its existing use, an exception should be made to the marketing requirement.</p> <p>D2 uses should be recognised as acceptable uses on employment sites as they create sustainable employment opportunities and should be treated as other businesses when applying for a change of use or new development.</p> <p>Objection was made towards the HEDNA evaluation of Passfield Mill Industrial Estate as there is no recognition of local bus services and part of the site being within Flood Zone 2. Objection was also received towards the proposed designation of Hazelton Interchange as a Strategic Employment Site as non-employment use could be appropriate in the future.</p>

	<p>Many recommendations were made for other areas to be incorporated as Locally Significant Employment Sites, and a definition of these should be included in the glossary. In addition, some amendments to wording and terminology have been suggested, specifically Policy S14.3 and Appendix 3.</p>
S15 Rural Economy	<p>Recommendation that the policy should extend to other types of rural business such as hunting, shooting and fishing. The definition of agriculture should be revised to include viticulture and horticulture.</p> <p>Comment was made that the primary focus of the policy should be on maintaining traditional farming methods that focus on sustaining the land. Diversification should be secondary, with an emphasis on sustainability.</p> <p>Critical comment was received that the policy has no plan to stimulate the rural economy and greater recognition should be given to the existing number of traders and entrepreneurs in the villages.</p> <p>Other comments were made that the policy should take a more restrictive approach to rural businesses outside of the SPBs and that the policy should also incorporate improvements to mobile phone coverage.</p> <p>An inconsistency has been noted between this policy and S13, with S13 unsupportive towards rural B use class businesses. Some amendments to wording and terminology have been suggested.</p>
S16 - Retail Hierarchy	<p>There is support for this policy, specifically use of retail hierarchy and Alton being defined as a town centre. Comment was made that the 'town centre first' approach is in accordance with the NPPF requirements. Suggestion received to use town centre locations in the first instance before considering edge of centre locations.</p> <p>Query raised regarding the definition of 'other established retailing location', as well as why The Square in Liphook has been defined as a district centre and the Liphook station area as a local centre.</p> <p>Recommendation that specific phrasing in the policy be removed.</p>
S17 Development in the Countryside	<p>There is support for this policy.</p> <p>Some amendments to wording and terminology have been suggested, with the aim of making the policy more consistent with NPPF. Specific alterations were suggested for Policy S17.1, S17.2 and S17.3.</p>

	<p>Concern was raised that incorporating cross reference to Policy S12 causes loss of clarity in the individual policies, as well as difficulties with enforcement. Comment was also made as to whether the policy in conjunction with S12 would constrain the demolition and rebuild of a dwelling under DM10.</p> <p>Query raised as to what the gaps between settlements are as boundaries are not shown, with subsequent concern that the area in gaps could reduce.</p> <p>Other comments stated that the policy should permit C2 uses as well as the implementation of the policy being resourced and funded for a long-term scale.</p>
S18 Landscape	<p>There is support for this policy.</p> <p>Comments stated that the policy should prevent development along the River Wey at Northbrook Park from being permitted as it is a historic landscape. It was recommended that the policy include reference to the following aspects, so they are also protected from adverse impacts of development: views; topographical features; skylines, ancient tracks; sense of place; and tranquillity.</p> <p>Response was made that the policy does not provide enough protection to the National Park, as focus is currently on the setting. To overcome this the special qualities of the National Park should be incorporated in the policy.</p> <p>Some amendments to wording and terminology have been suggested, specifically inclusion of the term 'Valued Landscapes'. Comment was made that the policy should refer to Neighbourhood Plans. The test of no adverse impact cannot be met.</p>
S19 Biodiversity, Geodiversity and Nature Conservation	<p>There is support for the policy, welcoming policy protection for hedgerows, trees and woodlands, as it aids protection of the landscape and character of village.</p> <p>Reference should be made to water resources, aquifers and water quality. Recommendation that biodiversity net gain can be incorporated in developments by including Swift bricks in every new dwelling to accommodate endangered species of birds and bats.</p> <p>Query as to whether a Biodiversity Enhancement & Mitigation Scheme should be required for all site allocations. Mitigation measures should be delivered prior to occupation and in perpetuity, as per Policy S20.3, and this is particularly important for the Wealden Heaths Phase II Special Protection Area. The policy should repeat the HRA regarding evidence of Shortheath Common potentially suffering from recreational pressure, although not to the same degree as SPA sites.</p>

	<p>There were multiple suggestions for additional policies, one being to ensure long term mitigation as well as monitoring and evaluation of the successfulness of such mitigation. Suggestion was also made that a policy is created that focuses on avoiding detrimental impacts to protected species. It was recommended that a separate policy for European sites should be included, as incorporation in one policy with national sites is not compliant with HRAs.</p> <p>Query was raised as to whether there should also be a strategic policy for achieving net gain in biodiversity across the district.</p> <p>Amendments to wording and terminology has also been suggested.</p>
<p>S20 Wealden Heaths Phase II Special Protection Area</p>	<p>There is support for the policy.</p> <p>It is recommended that Policy section S20.1 is strengthened to ensure no residential development is permitted within 400m of the SPA.</p> <p>Policy is vague about types of mitigation expected from Local Planning Authority, greater amount of detail should be provided. Regulation 19 should increase clarity to ensure that all developments equally contribute to mitigation combatting cumulative urban impacts in the 5km zone as such impacts will be similar and proportionate. Larger sites should still contribute to bespoke mitigation. Recommendation that the Poole Local Plan is a useful model to follow for what is permitted in the varying Risk Zones as well as describing how a developer can facilitate development through appropriate mitigation.</p> <p>Green Infrastructure schemes may not fully deter people from entering the SPA so robust mitigation should occur, as well as continuous monitoring to assess effectiveness.</p> <p>To reduce pressures on the Local Planning Authority, as well as ensuring consistency, it is recommended that a standard HRA template with accompanying set costed mitigation strategies is produced. This would follow similar approach as the Thames Basin Heath. Query was raised as to whether HRAs would apply to extensions as well as new dwellings.</p> <p>Suggestion that Regulation 19 should include greater detail regarding the scope, location, capacity delivery mechanism and continuous monitoring and management of the SANG/SAMM/HIBS.</p> <p>Recommendation that the Wealden Heaths Phase I is included in the policy.</p>

	Specific amendments to wording and terminology have been suggested.
S21 Thames Basin Heaths Special Protection Area	<p>There is support for this policy. Comment was made that the policy would benefit from relating to the Thames Basin Heaths Delivery Framework, as well as a recommendation being made for the CIL Regulations to alter so that payments can be made via Section 106.</p> <p>Recommendation that the policy is monitored, and any required mitigation is implemented.</p>
S22 Solent Special Protection Areas	General support.
S23 Green Infrastructure	<p>Responses supported this policy and encouraged protection of the landscape and Green Infrastructure network.</p> <p>Comment was made about the need for all Green Infrastructure areas to be resourced and managed to ensure successful long-term use. Greater emphasis should be made towards changing landscapes, aside from new development, as minor alterations are also thought to have an impact.</p> <p>Recommendation that linkages between the rural footpath and byway network are enhanced. This is to be achieved by developers being encouraged to develop public rights of way across their sites.</p> <p>Some amendments to wording and terminology have been suggested. Specific recommendation for Policy section S23.1.d to include the option of Green Infrastructure areas to be publicly owned.</p>
S24 Planning for Climate Change	<p>Support was received for this policy, with emphasis on the mitigation measure of SuDs.</p> <p>Responses stated that the policy should also include reference to reduced use of fossil fuels for building materials, greater recycling of building materials, incorporation of higher energy standards and that all new buildings should be carbon zero.</p> <p>Comment was specifically made that the policy should give greater attention to impact of climate change on water. This related to the availability of water and the impacts on the health of rivers, groundwater and biodiversity. Woodlands improve air quality, water management and green infrastructure.</p> <p>Some amendments to wording and inclusion of additional content has been suggested.</p>

<p>S25 Managing flood risk</p>	<p>There is support for this policy.</p> <p>Support was stated for the use of SuDs. It was recommended that the policy refers to the Local Flood Authority’s website to provide developers with guidance on SuDs. Comment was also made that the Woodland Trust should be referred to as trees play a positive role with SuDs, primarily by aiding issues resulting from climate change and benefitting Green Infrastructure. The policy should also refer to aquifer protection measures and adequate risk assessment being conducted when using direct infiltration systems.</p> <p>Comment was made about the flood risk sequential test, referencing that Northbrook Park would fail. Any development within areas of known or potential flood risk should not be allowed – not just that solely for residential.</p> <p>Comment was made that water and sewage infrastructure may be required if development occurs on flood risk areas. Contrary to this, responses stated that any type of development should be refused if located on flood risk areas.</p> <p>It was recommended that development is prevented on areas that have a history of groundwater or surface water flooding, as thought detrimental to future owners and such areas are required to accommodate the flood water. It is suggested that the Local Plan identifies which sites are at risk of groundwater flooding and the potential mitigation measures.</p> <p>Some amendments to wording and terminology have been suggested.</p>
<p>S26 Protection of natural resources</p>	<p>Responses supported this policy and encouraged it to be monitored/funded/resourced with mitigation measures utilised if necessary. Specific comment was given about taking a holistic approach regarding groundwater and river health.</p> <p>Some amendments to wording and terminology have been suggested.</p>
<p>S27 Design and Local Character</p>	<p>There is support for this policy, but query raised as to what defines ‘good design’.</p> <p>Comment received that the local planning authority provide a development brief to ascertain the important aspects of local character for each allocated site.</p> <p>Recommendations that the policy should relate to the SDNP design policies, village and town design statements, and Neighbourhood Plans. Comment suggested that design issues identified in village design statements and neighbourhood plans should be confirmed as requirements in the policy. Utilisation of a design review process and a locally appointed design panel was also commented on.</p>

	<p>Comment was made about the importance of placemaking and recommended that a supporting document accompanies applications greater than 100 homes. Additionally, placemaking should be key when community facilities are included in a development and that housing design is in accordance with a 'town plan'.</p> <p>Recommended that an additional requirement is made so that developments greater than 50 dwellings should demonstrate engagement with the local community has occurred from the earliest stages.</p> <p>Specific alterations to the policy were recommended, such as minimum garden size; preventing cumulative changes to local character; and inclusion of recycling and waste management infrastructure in the design of developments.</p>
S28 Heritage assets and historic environment	<p>There is support for this policy.</p> <p>Some concern that there is a suggestion that there can be 'harm to a degree' whilst understanding there must be a balance. Each situation must be weighed on its merits.</p> <p>Alterations to the wording/terminology of the policy was received. Specific comment was made to ensure clarity around the term 'Heritage Asset'.</p> <p>Comment was made that the policy should encourage development to secure enhancements to local heritage where possible.</p> <p>Specific comment was made regarding Chawton House and the aspirations for it to become a sustainable, cultural tourist destination. Response featured reassurance that the Local Plan values heritage protection and encourages local economic development.</p>
S29 Infrastructure	<p>There is some support for the policy, specifically Policy section S29.2, but suggestion made to state this also applies partnership working across the boundary of Local Planning Authorities. Also support shown for the Infrastructure Plan being reviewed regularly, particularly in relation to development occurring later in the plan period.</p> <p>A holistic approach should be taken to ensure infrastructure is sufficient in facilitating pressures from the cumulative impacts of development. Also, that infrastructure should be upgraded prior to development, not many years after. There was also the suggestion of using Grampian planning conditions to secure the provision of infrastructure prior to the commencement of development or at the agreed trigger points during development.</p>

	<p>From local experience, it is suggested that development proposals must include design details of how sites will be connected to the main infrastructure services.</p> <p>Many responses featured concerns over transport services. With regards to the highway, it is not thought that the northern and southern roads in Alton can accommodate increasing traffic flow, consequently recommendation was made of a northern relief road from Chawton roundabout to join the A31 east of Holybourne. Additional public transport was recommended in the form of a twin track railway line between Alton and Farnham, as well as the subsidised bus service for the New Town in Whitehill & Bordon, to accommodate increased commuting from the area. There is no specific mention of any infrastructure improvements in Whitehill & Bordon.</p> <p>Local sewage treatments in Four Marks are at capacity, water pressure is low and there are drainage issues, which are associated with increased demand and inappropriate drainage. Concerns raised as to whether the infrastructure needed in Alton will be able to be provided, such as schools and healthcare, for an increasing population. Specific comment that since new homes have been built in the area, water pressure has reduced. This needs to be addressed before more homes are built.</p> <p>Specific amendments to wording and terminology have been suggested. Comment was made that greater clarity should also be stated regarding the purpose of CIL.</p>
S30 Transport	<p>There is support for this policy.</p> <p>Multiple comments were made that greater emphasis should be placed on public transport, specifically greater linkages when discussing sustainable travel and increased levels of car sharing. Concern was raised about the declining use of buses and cuts to services, but how the Local Plan makes the assumption that people will utilise the services. Reference made to keeping rail link in Whitehill & Bordon under review, but greater explanation warranted for its strategy. Safeguarding of disused railway lines from future development, to facilitate future uses of non-motorised uses was recommended.</p> <p>Response highlighted need for discounted taxi costs for ageing members of the community and that Surrey County Council should be referred to as an example of this.</p> <p>Queries raised as to how the policy will be achieved as there is a high level of existing congestion on the road network, as well as overcrowding on train services. Specific comment was made about how the traffic lights and congestion in the neighbouring local planning authorities towns of Guildford and Farnham will be managed.</p>

	<p>Comment was made that a walking and cycling strategy is required as well as electric charging points in all car parks.</p> <p>Response relating to the allocation of sites in Northbrook Park and Whitehill & Bordon contradicts the policies desires to reduce the need to travel.</p> <p>Other comment was made that a holistic approach was required when considering the cumulative impacts of development.</p>
<p>S31 Havant Thicket Reservoir</p>	<p>Comment was made that the local planning authority should consult with the new draft Water Resources Management Plan for Southern Water Services, to ensure that water stress and impacts over the next 40 years are sufficiently incorporated in the Local Plan.</p> <p>Specific comment was made about policy section S31.1.k, recommending that all of the Registered Park be excluded from the development site and questioning whether the ancient woodland meets the NPPF definition.</p> <p>Responses raised concern about risk posed to biodiversity, specifically Bechstein Bats. Cumulative impact from Havant Borough Council and East Hampshire District Council posed on the habitat of the bats will need to be mitigated against.</p> <p>Other comments suggest recreational opportunities are maximised as well as being supportive towards mitigating impacts on the South Downs National Park and safeguarding the Thicket Reservoir Site.</p> <p>Key stakeholders commented that they wish to be engaged with during the planning application process, preparatory work and construction of the Havant Thicket Reservoir, to ensure collaborative mitigation.</p>

Site Allocations

<p>General comments relating to Site Allocations from the questionnaire</p>	<p>Suggest reducing the number of homes to achieve quality buildings.</p> <p>Sites need to respect the land outside of the development boundary.</p> <p>Consideration of geology and hydrology needed.</p>
<p>SA1 Land at Lowsley Farm, south of the A3</p>	<p>Responses highlighted concerns about poor access and egress with possible congestion and increased parking.</p> <p>Some comments noted a need for improvements to existing sewage and drainage systems and the road network. Some suggested that there should be cycle routes, footpaths and fibre optics to each premises.</p> <p>Specifically, it was suggested that draft Local Plan Core Objective C has not been met regarding infrastructure improvements.</p>
<p>SA2 Chillley Farm, Liphook</p>	<p>General comments received objecting to the loss of countryside land and adverse impact on sunken lanes. Adverse impact on the character of the area.</p> <p>Queries made as to what has changed since a planning application for development of the site had been refused. Concerns about potential contamination of the land and need for remediation before development. Proposal is contrary to policies in the draft Local Plan and the Sustainability Appraisal.</p> <p>Comments were made about the density of the proposal, stating it is too high. No reference has been made to DM30 – Residential design in low-density neighbourhoods.</p> <p>Concerns also about setting a precedence for further development in the countryside, and at this density.</p> <p>There is concern about the impact of development on the local road network, particularly with regards to congestion and road safety. Comments include that this is a car led development, and that the railway bridge is too narrow.</p> <p>Concerns were raised about the ability of the infrastructure to support more homes, particularly with regards to foul drainage and water supply. Cases of frequent power cuts were noted, and it was stated that the proposed site is too far</p>

	<p>away from local schools. No benefit to the local community from this development. Improvements to broadband needed in the area.</p> <p>There is also concern with regards to the impact of development on the South Downs National Park.</p> <p>In terms of location, it was said that the site is too far from the centre of the village and on the wrong side of the village for schools.</p> <p>Concern was raised for any species on the site. It was also queried if there is SANG it mitigate potential harm from development on the Special Protection Area.</p> <p>Alternative site suggestions were made, primarily referring to Penally Farm (LAA/LIP-014).</p> <p>However, it is contended that this is a deliverable site, within the first five years of the Local Plan. The proposed phasing of the site at the back end of the plan is at odds for the NPPF. The site is in single ownership and can be delivered earlier. There is a pressing need for new homes and affordable homes.</p>
SA3 Land west of Headley Road, Liphook	<p>Comments that support the proposal primarily refer to accessibility to education facilities, amenities and Lowsley Farm Suitable Alternative Natural Green Space (SANG), and opportunities for potential improvements to infrastructure.</p> <p>Some comments noted a need for improvements to existing sewage and drainage systems and the road network, suggesting that there should be cycle routes and footpaths to each home. Concern has been raised about the speed of vehicles in the local area, with the suggestion that new development provides mitigation, and that development will leave a landlocked area between itself and Lowsley Farm. It was mentioned that the opportunity to combine infrastructure with Lowsley Farm has been missed.</p> <p>Other comments refer to the mitigation measures being proposed, and technical work carried out to support the proposal. Of relevance is ongoing consideration of SANG, in dialogue with Natural England.</p>
SA4 Land adjacent to Billerica, Church Road	<p>Support has been expressed for this proposal, primarily focussing on the benefits it could bring to the community. Supporters state that the facility would be well used and would provide a central focus for the village.</p> <p>Suggested uses for a community facility include a pop-up pub, private functions, clubs, societies and fundraising events in addition to overflow parking for the church or a recreational space.</p>

	<p>Some comments raised concerns that a community facility is not needed and would be an unnecessary expense when there are suitable venues in Liphook.</p> <p>Suggestions were made to improve the footpaths accessing the site, as some concerns were raised about suitable pedestrian access, and traffic management and arrangements for parking. Another suggestion received was that the site should be included in the Settlement Policy Boundary (SPB).</p> <p>A query was received regarding the site's inclusion within the 400m of the Special Protection Area (SPA) and whether that is evidence based.</p> <p>Information submitted included referencing the historic use of the site as a wartime dance hall.</p>
<p>SA5 Land at Headley Nurseries, Glayshers Hill, Headley Down</p>	<p>In relation to infrastructure, comments focussed primarily on drainage and access. Concern has been raised over the capacity of the local sewage and drainage network, given ongoing issues, and connection to the mains water supply. Equally, concerns over land ownership needed to gain vehicular access to the site, and the provision of satisfactory sight lines for this site being, as it is on a steep hill, near a junction.</p> <p>Deliverability of this proposal has been queried, suggesting this site should be removed from the plan on this basis.</p>
<p>SA6 Land adjacent to Hillside Close, Headley Down</p>	<p>Many responses focussed on existing wildlife on site and the potential adverse impact on this from development, and on an adjoining nature reserve. Some respondents would like to see the site be enhanced as a nature reserve.</p> <p>Comments have asserted that the site forms part of an unregulated historic landfill which has halted previous development due to concerns about possible water contamination, and that controls would be needed on surface water drainage and piling to reduce the risk of contamination.</p> <p>With regards to infrastructure, specific concerns were raised about the restricted space for vehicular turning and parking, particularly a lack of parking spaces in Alder Road. Reports have been received of subsidence problems in Alder Road, and concerns about existing capacity issues in the sewage network which cause overflowing.</p> <p>It was questioned whether there is a need for affordable homes because of the quantity that is being provided nearby at Whitehill and Bordon.</p> <p>Other comments referred to the instability of the site having previously been landfill, its steep gradient, the presence of Japanese knotweed and a restrictive covenant.</p>

	<p>The proposal was given some support on the basis that it is in a sustainable location which adjoins the Settlement Policy Boundary, has access to local facilities and open space, is available and deliverable and can accommodate 12-15 homes.</p>
<p>SA7 Land at Middle Common, Grayshott Road, Headley Down</p>	<p>Whilst comment has been made that there is no mains connection for waste water, comment has also been received that connection to all main utilities and services can be provided. It is also asserted that the site is not susceptible to surface water flooding.</p> <p>Other comments reference the risk of coalescence from development, and the prominence of the site in undeveloped countryside when viewed from a footpath along the northern boundary.</p> <p>It is asserted that the site is deliverable for the proposed use, and access rights are established.</p>
<p>SA8 Land off Hollywater and Whitehill Road</p>	<p>There is support in principle for this policy. It is asserted that following further landscape and character assessment, the site could have capacity for between 270 and 360 homes and 10ha of SANG – with the potential for further SANG to assist other regeneration. It suggested that the wording should be amended to clarify the status and phased provision of SANG and the site be brought forward to 2026 onwards. Eveley Wood SINC would be kept free from development and protected by landscape buffer and access should be Hollywater Road rather than Mill Chase Road.</p> <p>Comment was made that the policy should be enforced and state a targeted amount of specialist housing. Additionally, it is not considered appropriate to expect specialist housing on all allocated sites, instead the requirement should be determined for individual cases.</p> <p>Comments referred to increased clarity of the Use Class in the policy, relating to C2 and C3, and suggested that Use Class is not specified at all.</p> <p>Responses highlighted that as facilities would be provided on site, such developments do not need to be in a sustainable location. Comment was made that the design of the development should be in keeping with the surrounding area.</p> <p>Some revisions to wording and terminology have been suggested, specifically recommendations to alter Policy section S8.3. In addition, responses emphasised a need for defining terms, such as ‘clearly defined need’.</p>

<p>SA9 Whitehill & Bordon Strategic Development Area</p>	<p>Some comments have raised concerns about additional homes being proposed here, contrary to the master plan for Whitehill and Bordon, with specific concerns about the impact of development on biodiversity and green corridors. In addition, comments have referred to the provision of SANG, suggesting insufficient may be proposed, and the impact of additional traffic on the setting of the South Downs National Park (SDNP).</p> <p>It has been suggested that it is unclear how Phases 1 and 2 of the Town Centre are included in the Local Plan.</p> <p>With regards to the mix of housing, a suggestion that provision should be made for affordable supported housing, including extra care housing, has been received.</p> <p>Reference has been made to potential presence of minerals (sand and gravel).</p> <p>Suggestion of additional supporting text, saying there will be a greater mix of housing tenures across the town; including supported housing such as Affordable Extra Care Housing both for older people and those with learning disabilities.</p>
<p>SA10 Louisburg Barracks</p>	<p>The related Suitable Alternative Natural Green Space (SANG) will need to be resourced and funded for the long-term with community use at its core to ensure responsible use.</p> <p>The use of the land to the North West of the site is unclear. This area includes ancient woodland that could be disturbed from the effects of this proposed development.</p>
<p>SA11 Bordon Garrison</p>	<p>A lot of the comments have focussed on the proposed SANGs, and their potential suitability. Comments have been made that the SANG needs to be resourced and funded for the long term with 'community engagement' at its core to ensure it is used responsibly. With regards to the proposed SANGs, comments have noted that the Slab is a SINC and part of Oxney Farm is also a SINC.</p> <p>There is general concern about the impact of development on the Special Protection Area (SPA) and greenfield land, suggesting that because infrastructure has been planned for at Whitehill and Bordon, the area has become a focus for further growth using greenfield land and risking local health land. It is suggested that other areas should be considered that do not potentially damage the Special Protection Area (SPA).</p> <p>It has been suggested that some parts of the site are removed to retain the continuous woodland network and provide nesting for house martins and swifts. Also, suggestions that the capacity of the site be retained at that in the Joint Core Strategy (JCS).</p>

	Concern has been raised about impact of development on heritage assets as the site comprises barrow scheduled monuments. Comments have also questioned the overall delivery of new homes in this area.
SA12 Mill Chase Academy	<p>Specific comments query some flood risk information, suggesting that the whole site is susceptible to surface water flooding, and that following modelling work, only a small part of the site is within flood zone 2 (medium risk). In addition, there is potentially minerals presents (sand and gravel), which should be dealt with in accordance with Hampshire County Council Minerals and Waste Safeguarding in Hampshire SPD.</p> <p>The new SANG will need to be suitably resourced and funded for the long term, with community engagement at its 'core', to ensure that it is used responsibly.</p> <p>Comment was made about the lack of reference to infrastructure and it was questioned whether the wastewater drainage system has the capacity to take waste from the development. The site will require a reliable bus service.</p> <p>It is suggested that the site can deliver development between 2020/21 and 2023/24.</p>
SA13 Land at Borovere Farm, Alton	Comment was made that there has been no biodiversity assessment and the development on this site would have an adverse effect on biodiversity and trees.
SA14 Land at Cadnams Farm, Alton	Concern was raised that development would have a detrimental impact on the local landscape as the site is in a prominent position in Alton, on one of the highest points in the area.
SA15 Land at Lord Mayor Treloar, Alton	A comment suggested that the butterfly meadow should be protected.
SA16 Land at Will Hall Farm, Alton	Responses raised concerns about overdevelopment of the site, visibility of the development and implications regarding drainage. Ground water springs along the northern Wey reduce the area of developable land.
SA17 Land at Wilsom Road	Whilst a range of issues were raised, flood risk and vehicle access were highlighted as key concerns, with comments specifically asking what has changed on these issues since the planning application in 2017 was refused. The comments submitted provided specific information with regards to both these issues, with significant concern about the prospect of development increasing the risk of flooding in the local area, including surface water flooding, noting that considerable flood

	<p>risk mitigation will be needed as part of the development scheme, with knock on effects on viability. Comments referenced historical cases of flooding. With regards to access, comments noted the access route is a busy road at peak times, that bends in such a way that access could be challenging. Some comments state the road is not suitable for HGVs.</p> <p>Other concerns raised relate to the proximity of the development to a residential area, and the need for the proposal to be sensitive to this, particularly with regards to noise.</p> <p>Comments raised concerns about the visual impact of development, particularly on the landscape. Related to this, comments were made about the potential design and how that would relate to the local area, with the South Downs National Park nearby. The development would result in the loss of countryside, and harm biodiversity. Examples of wildlife in the local area have been listed.</p> <p>There is potential for minerals (sand and gravel) at the site, and it is also within a buffer zone of water treatment works, which will need to be taken account of. Ground water springs along the northern Wey reduce the area of developable land.</p> <p>Some comments queried the deliverability and viability of development of this site for employment uses, particularly referring to evidence base document 'Interim Local Plan Viability Assessment'. Comments noted that there is an industrial estate close by which is currently underutilised and would benefit from regeneration. If addition employment land is needed to support new homes, then incentives should be offered to businesses to build on the industrial estate.</p>
SA18 Molson Coors Brewery	<p>The comments received express a variety of specific opinions on the proposed uses for this site. Some comments do express support generally for the redevelopment of this brownfield site in Alton.</p> <p>The inclusion of a community facility and hotel on site attracted comments, with some support for the inclusion of a community facility, but another comment saying the inclusion of both these uses has not been justified by evidence, suggesting inclusion of a care home instead (75 bed plus an additional 60 bed extra care apartments). Other comment suggested the proportion of affordable housing should be higher. With regards to the inclusion of small scale retail/ food and drink premises, comment was made that this use would not be effective, and the site is more suited to supporting the existing town centre rather than potentially drawing trade away from it.</p> <p>Some comments did not agree with the proposed phasing of development of this site, suggesting it could and should be delivered earlier in the Local Plan period. With regards to the type of housing, it was noted that small units are needed (mainly 2 bed), and that the site could contribute to meeting specialist housing needs.</p>

	<p>Comments were made in relation to flood risk and other environmental considerations such as wildlife corridors along the river, retention of trees and potential contamination. Heritage is raised as a key consideration, given the site includes a Grade II listed property. Comments support the retention of the building and development should preserve or enhance its setting and conserve or enhance the Conservation Area.</p> <p>Some general raised the need for an adequate road crossing to the connect to the town centre, potential for basement parking to make use of land levels, further parking needed, capacity of 150 homes more realistic given constraints and references should be made to the Alton Design Statement.</p> <p>A comment stated that the viability work is out of date, not in accordance with the NPPF and PPG and does not benefit from a detailed understanding or site constraints and costs. The general viability work for the plan is not suitable for the specific factors affecting viability of the site. There is no evidence provided by the Council to demonstrate that the proposed mix of uses is viable and would ensure the delivery of the site.</p>
<p>SA19 Land at Brick Kiln Lane and Basingstoke Road</p>	<p>There were concerns expressed about the location of the site, in terms of its sustainability – saying it is out of town, not close to facilities and in a location that is low in the settlement hierarchy (in relation to Beech), and also due it its location within a green gap between Alton and Beech. However, comment noted that further residential development at Alton is consistent with the Spatial Strategy.</p> <p>With regards to housing, development of this site will help towards meeting needs, and could accommodate at least 225 new homes, and be delivered earlier than the phasing policy suggests.</p> <p>Comments highlight the sensitivity of the site due to is hillside location and thus dominating the skyline, and the potential impact of development on the entrance to Alton, noting it as an intrusion into the countryside. It is visually prominent with views from Ackender Wood and the A339. It is however also suggested that development can be achieved with a layout that is sensitive to existing landform.</p> <p>Development would have an adverse impact on the SINC and Ancient Woodland which cannot be mitigated. Development would result in the loss of agricultural land, and the area should retain its rural character.</p> <p>Concerns have been raised about the impact of development on flood risk including surface water flooding, particularly the impact of flooding further downstream. It is acknowledged that a Level 2 SFRA would be required, and that the majority of the site lies in flood zone 1 (low risk). An effective SUDS scheme will be required to ensure the North Wey is protected and enhanced. SUDs solutions for surface water and storm management can be achieved.</p>

	<p>The site is adjacent to a group of Grade II listed buildings at Will Hall Farm. The site allocation policy should include in requirement that this site should preserve or enhance the setting of these buildings and a full assessment of the potential impact on the listed buildings is required.</p> <p>Comment was made that this development is not the most appropriate to extend Alton and would put further pressure on the A339 resulting in more traffic in Alton. As mitigation, more parking in Alton town centre would be needed as well as a roundabout on the Basingstoke Road/Whitedown Lane. Comment also noted that safe and efficient access to the site can be achieved from Basingstoke Road.</p>
SA20 Treloar College, Holybourne	<p>Many responses support the college and its proposals, citing benefits and positive aspects of the college's work and suggesting that development would help secure the future of Treloar College. Responses have recognised the role of the college as a significant local employer, whilst acknowledging the challenge faced to recruit highly qualified staff.</p> <p>There is a general feeling from many responses that this proposal will help recruit and retain staff (given high local housing costs), providing an overall benefit for students. In addition, staff accommodation on site would help to reduce local traffic congestion and pollution.</p> <p>The site is in an accessible location, safe and suitable access can be delivered, and the impact of development generated traffic will be minimal and not impact upon the local highway network. The site can be brought forward in accordance with national planning policy, and transport requirements.</p> <p>However, objections have been made to this proposal, primarily because it is outside of the settlement boundary, considered to have an adverse impact on the countryside, with no proven need for the proposal. There is concern that allocating this proposal would set a precedent for further development outside of the settlement boundary, and that other alternatives should be considered.</p> <p>The proposal attracted many specific comments with regards to the potential rerouting of the footpath, with many acknowledging that the footpath is well used, but presents a security concern for the college. The historic importance of St Swithin's Way has been referred to in responses, along with rerouting increasing the distance for walkers between Alton and Holybourne. A variety of views on this have been received, with no overriding consensus.</p> <p>Specific concerns have been raised about potential noise disturbance from events on site, landscape impacts and the need for any development to preserve or enhance the setting of a nearby Grade II* Listed Building, and conserve or enhance the setting, character and appearance of the Conservation Area. In addition, whilst the proposal is referenced as 'infrastructure' in the draft Local Plan, some responses wish to clarify that the site is a private facility.</p>

SA21 Land at Northbrook Park	<p>There is some support for this proposal, commenting that it would release housing pressure on Bentley and help to protect the village, it a better way to provide new homes with school and shops included in the development, help sustain local businesses, and has suitable access and will relieve pressure for development elsewhere. The proposal is fully consistent with NPPF paragraphs 72 and 171, and is intended to be an exemplar development. It was stated that this should be a 'broad location for growth' rather than an allocation and kept under review.</p> <p>However, many comments objecting to this proposal. Most comments focus on infrastructure, scale and local impact (including impact on residents of Waverley borough).</p> <p>The scale of development would create too much harm to the local area, transforming the countryside into suburban sprawl. It would be damaging to the setting of the SDNP and landscape setting of Bentley. It is a highly prominent site, and visible from the SDNP – of important visual landscape value. The proposal would have an adverse impact on Bentley, ruining its character as a historic rural village. There would be a loss of tranquillity in the area.</p> <p>The proposal is not sympathetic to the heritage of the listed buildings. The development should retain these buildings and preserve or enhance their setting, which would be expected to be in an open landscape. This should be a requirement in the allocation policy. The proposal is contrary to NPPF policy regarding heritage.</p> <p>The development is not needed and large new developments outside of built up areas should be resisted. It will lead to ribbon development to Farnham. The development is not of a sufficient size to be self-sustaining. It is not big enough to provide services and facilities, and will be a dormitory town.</p> <p>Comments stated that the proposal is contrary to policies and objectives within the draft Local Plan.</p> <p>Concern about development in an environmentally sensitive area, with particular concern about the River Wey Valley, the Ancient Woodland, SINC, trees and woodland, wildlife and flora and fauna. Concern the cumulative impact on biodiversity and habitats has not been assessed. The River Wey valley and flood plain is the subject of a Biodiversity enhancement project. It is unclear if net gains in biodiversity can be achieved. However, it is stated that there will be significant biodiversity gains through an enhanced landscape with improved habitats and opportunities for new habitat creation.</p> <p>Many comments that focussed on infrastructure particularly commented on transport, congestion, safety and access, including concern about pollution from traffic. Concern that development will result in increased traffic on rural lanes nearby, and that the local train stations cannot cope with additional passengers. Many specific details of roads, junctions, accidents and estimates of vehicle movements were submitted. Also, comments were received about mitigation, bypasses and transport modelling. Transport modelling for Regulation 19 stage must include an assessment of impacts within</p>
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Waverley borough that takes into account the Waverley Local Plan alongside other Local Plans such as Guildford and Rushmoor.

Comments also focussed on education and health care provision, and the challenges currently faced with facilities running at capacity. However, it is also stated that there will be new community benefits and village services. Equally with regards to flood risk, also stating that it is not clear from the evidence if the choice of Northbrook Park satisfies the flood risk sequential test.

The location of development is too remote, and the site does not adjoin a settlement. It is too far from Bentley to provide any meaningful links to the village, and not conveniently located for the train station. Cannot walk to Bentley or Farnham station and people will not want to cycle along the A31. The bus service is poor. It is too close to the SPA and the SANG location is inappropriate and not large enough.

There is concern about the impact of development on the local community, particularly its cohesion and identity.

The site has not been tested for deliverability, and is undeliverable. The supporting text of the policy does little to convey any confidence about its delivery. Concern that development is unable to address the constraints and costs. However, it is stated that reports confirm the site is deliverable, achievable and developable, and that the scale of development proposed can be viably delivered. Support use of an Area Action Plan to deliver the site.

This site needs to be considered cumulatively with other developments in the area. There is no evidence of cooperation with Waverley Borough Council.

Alternative strategies and sites suggested that would have less adverse impacts. However, it is also stated that this site removes pressure for development of less desirable sites.

<p>SA22 Land at Lynch Hill, Alton</p>	<p>The proposal attracted a variety of opinions, particularly about access and deliverability.</p> <p>General objections were raised to the expansion of this site which could encourage further spill onto the Holybourne side of Montecchio Way. Concern was also raised that the development would be too big (scale) and breach the skyline.</p> <p>Given the planning history of the site, the issue of access attracted comment, ranging from promoting access via Waterbrook Road, to asserting that access via Montecchio Way is deliverable and suitable. Concerns raised about highway safety and the planning history of seeking access via Montecchio Way. The Public Right of Way is well used.</p> <p>With regards to the general location, comments noted there is good access to the highway network, this is a sustainable location for this use, and it is accessible by public transport, walking and cycling.</p> <p>Landscape considerations featured in many comments, ranging from stating development would be harmful to the landscape and have an urbanising effect, to stating there are no specific landscape designations on site and appropriate landscaping can be accommodated on site. The landscape and topography of the site has raised concerns, particularly about the impact on Alton's valley setting and urbanisation of the rural entry into the town.</p> <p>Concern was raised about the impact of development on ecology, for example, the northern part of the site offers the most suitable habitat for dormice. However, it was also commented that there are no SINCs, SSSIs or local wildlife sites within the boundary.</p> <p>This proposal would be the largest employment site in the district. It is suggested that flexibility of use is required, including some non B uses, to allow the site to be delivered on a phased basis and earlier in the plan period. By supporting retail, food and beverage uses onsite it was suggested it would help to attract occupants, particularly technology-based occupiers in R&D and office type facilities. The site is otherwise too isolated to attract new businesses, and this could mean a delay to delivering the necessary infrastructure to commence employment-related development. Development would help to build a strong, responsive and competitive economy, with the creation of much-needed employment land and jobs.</p> <p>It has been noted that a small part of the site is in Flood Zone 2 and there is groundwater flooding which will require an exception test. Climate change considerations should also be included.</p> <p>Concern has been raised about land around the site remaining designated as countryside. Access should be removed from the countryside.</p>
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<p>SA23 Land north of Wolf's Lane, Chawton</p>	<p>Some comments received recognised the importance of providing accommodation for all members of the community, however most comments did not support this site as a location to help meet the need for Travelling Showpeople accommodation. Indeed, many comments noted that this proposed site allocation would be contrary to many other policies and objectives in the draft Local Plan and the national planning policy, stating that too much weight have been placed on need, rather than the preservation of the environment and culturally and historically important areas.</p> <p>The proposal would cause an adverse impact to the amenity of existing residents (noise, loss of privacy, overshadowing and loss of views). The proposal would be overdevelopment of the site, too large scale for the area, and be of a disproportionate size to Chawton.</p> <p>It would be highly visible and destroy an important gap/green barrier separating Chawton from Alton – risking merger with Alton. The proposal is inappropriate development in the countryside outside of the settlement, would urbanise the road, and increase the likelihood of further development along the road. The development would be highly visible, particularly in winter. However, it is also stated that the site is well contained and screened.</p> <p>It would be unsafe for people to live on this site, so close to the A31. Due to carbon monoxide / NOx and micro particles from traffic. Concern about air and noise pollution for residents.</p> <p>Development would have an adverse impact on the character of the area, and would be out of character with the local area. The proposal would damage an area of natural beauty.</p> <p>Specific concerns have been raised about the impact of development on the landscape and particularly the setting of the South Downs National Park. Comments suggest this land should have been included in the SDNP. This is the gateway to Chawton, which is identified as one of the four key villages which are area based priorities within the SDNP. The site forms a coherent historic landscape. The combined adverse effects of the allocation upon the positive contributions to the setting of the National Park currently made by this site, are not possible to mitigate sufficiently or successfully.</p> <p>Equally, significant concern regarding the adverse impact of development on heritage and cultural assets and the conservation area. Many responses have supplied detailed information about the historical importance of Chawton and its association with Jane Austen.</p> <p>Also, detailed information about wildlife and species has been submitted, with concern about the impact of loss of hedgerows, wildlife and rare species. Of note is the wildflower and butterfly meadow created at Naturetrek nearby.</p> <p>Many comments have drawn attention to infrastructure pressures in the local area, seeking assessment of cumulative impacts of development on infrastructure. Specifically, comments have focussed on transport, including concern about</p>
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HGVs accessing the site and travelling along Wolf's Lane and through the village. Many concerns about the safety of the junction near to the site, the tight corner, and the highway works that would be needed to facilitate safe access, changing the character of the rural lane. Traffic travels at speed on this road, and any overflow parked cars would cause safety concerns. This junction is a known accident black spot. There is no footpath, no pedestrian access, and walking along this road is dangerous. The road is narrow, rural, busy, and a rat run. There is already significant congestion in the village, particularly in holiday season. However, it has also been stated that there is good visibility in both directions at the access point to the site.

There are concerns about access to water – as there is no water point currently on site, and may not be feasible to connect to water. However, it has also been stated that connections to main utilities can be readily made.

There are concerns about development increasing the risk of flooding on sites and elsewhere, particular if non-permeable surfaces are used. There is a history of flooding in the area. The Lavant Stream can overflow, is prone to flooding and passes under Wolfs Lane next to the western boundary. During winter it becomes high. There are concerns regarding ground water, drainage and contamination. The site is surrounded on three sites by designated flood plain. This would lead to significant issues regarding appropriate drainage and also a risk of flooding on the land. The development proposed is highly vulnerable to flooding, and consideration of climate change allowances is needed. However, it is stated that initial feasibility work indicates a drainage solution is technically achievable and can viably be provided.

Chawton attracts many tourists, and there is concern about the impact of the proposal on tourism and the local economy. Visitors use Wolf's Lane to access the village.

The proposal does not provide the opportunity for healthy lifestyles for those living on site. New residents would feel isolated from the community. Children would not be able to walk to school from the site. However, it is also stated that the site is not remote with regards to national planning policy, and is close to Alton and Chawton in combination providing a full range of services and facilities including education, medical and transport.

There is no specific need for the proposal in this area – there are sites available in other places. The needs assessment is not robust.

It is asserted that this is a deliverable site, which can be delivered in the first 5 years of the Local Plan.

<p>SA24 Land adjoining Northfield Lane</p>	<p>Queries were raised about the type of employment uses proposed for this site, stating that more information is needed. There is no information about what operational restrictions there would be, such as hours, noise etc. Some comments said the development is not needed (there is no evidence of need) and is not viable. This is an inappropriate site for employment uses and there are brownfield sites in Alton which would be a better location for the proposed use. The proposal undermines Alton Neighbourhood Plan's intention to protect the setting, heritage and character of Alton.</p> <p>There are concerns that development will lead to coalescence, and erode the gap between Alton and Chawton. It will set a precedent for development in the gap. Development will have an adverse impact on openness and views, and is out of keeping with the rural character of the area. The site is clearly visible from the A31. There would be an adverse impact on the setting, appearance and views into and out of the SDNP and the village Conservation Area. This is a raised site which acts as a gateway to Alton. However, it is asserted that mitigation is possible through design.</p> <p>There are concerns about loss of wildlife, habitats, greenspace, woodland and green corridors. Also concerns about the impact of development on historical environment, heritage assets and the setting of listed buildings. Chawton is of significant historical importance. Chawton village will be dominated by this highly visible site.</p> <p>The Mid Hants Railways is an important heritage attraction and also of significance to the tourist economy. Greater assessment of the impact of development on tourism is needed.</p> <p>There are concerns that it would be difficult to provide the infrastructure needed to support this development such as upgrades to the power-supply, treatment of wastewater and flood risk alleviation. It is not a well serviced site and is at risk of flooding. However, it was noted that the installation of high speed data services to the site could be linked to providing high speed internet into the village. Facilities for employees for lunch etc would create more traffic movement and parking issues for Chawton. Access is poor, and the local roads are narrow requiring improvements to accommodate HGVs. Significant highway improvements would be needed. Various comments received about possible access routes and safety concerns.</p> <p>Some support noted, stating that the timescales for development should be kept under review. Due to other considerations regarding other proposed employment sites, this is the only likely site that could make a meaningful contribution to new employment opportunities for the growing town of Alton.</p>
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<p>SA25 Land South of Winchester Road, Four Marks</p>	<p>There is some support for this site as a logical extension to an existing residential area with good public transport connections. However, it is also noted that the site occupied an edge of settlement location with a degree of isolation.</p> <p>However, there is general concern about more development in Four Marks, given the amount of development recently built and the current pressure on infrastructure. There are concerns this proposal would lead to ribbon development, and is too far from the centre of the village, shops and facilities. It is an unsustainable location, detached from core services – extending the village too far to the west. The proposal does not reinforce a sense of place.</p> <p>The site can accommodate 150 homes. However, other comments state the capacity should be lower.</p> <p>There are concerns about the environmental impact of development, however, it is asserted that the development does not require the removal of significant amounts of trees and hedging, so wildlife habitats can be retained. There are concerns regarding additional flood risk and surface water flooding due to increase hard surfaces.</p> <p>Development would impact on views to and from the village, and have an adverse impact on local character. There is also a concern about the loss of good agricultural land in the village.</p> <p>Concerns raised about vehicular access to the site due to road speeds and quantum of traffic. Junction improvements would be needed. The proposal fails to facilitate any meaningful cycle and pedestrian connectivity between residential areas. Generally, sewerage, water supply and highway capacity need to be addressed and the lack of infrastructure in Four Marks, such as community facilities and schools were commented on. Broadband and mobile phone signals are poor in the area.</p> <p>Various opinions about the phasing of development stating it should not be phased, and that phasing is supported to allow currently constrained infrastructure to catch up. The site should not be allocated unless Woodlea Farm is also allocated for residential development.</p>
<p>SA26 Janeland, Willis Lane</p>	<p>There is general concern about the concentration of sites in one village, saying it is disproportionate and will dominate the settled community (in combination with other sites). It is queried whether the proposal is compliant with other policies in the draft Local Plan. There is concern about the proposed density.</p> <p>The proposal does not respect the existing street pattern, which is single dwellings with relatively large gardens.</p> <p>The proposal would have an adverse impact on the rural character, and is out of keeping.</p>

	<p>The need for pitches is queried, particularly as it is stated that pitches in other areas have remained vacant.</p> <p>With regards to infrastructure, it is suggested that a new criteria is added to the policy which states, “Development will be dependent on the provision of infrastructure for adequate wastewater conveyance and treatment to meet strict standards.” In addition, it is noted that local infrastructure is not sufficient to support development, and local services have not kept pace with development.</p> <p>The Council should identify alternative sites in other areas of the district, and consider a percentage allocation on larger sites to meet needs (similar to affordable housing). There is little evidence the Council has collaborated with other councils to discuss provision or establish current/future demand for the site.</p>
<p>SA27 Land at Briars Lodges, Willis Lane</p>	<p>Some support was given due to the lack of supply for Gypsy and Traveller sites.</p> <p>However, several objections were received. Primary concerns relate to the concentration of Gypsy and Traveller sites in a small area, and its impact on the rural character of the village, and the existing services and facilities. Concerns about potential noise were also raised, and the density of the proposal. It is queried whether the proposal is compliant with other policies in the draft Local Plan.</p> <p>Specifically, comments were received regarding the changing street pattern from existing ribbon development, to developing further back from the lane. Respondents would generally prefer the development to be in a less sensitive location.</p> <p>The proposal would need to be well landscaped with natural hedging, to maintain the existing character and respect the dark night skies. The proposal would have an adverse impact on the rural character, and is out of keeping.</p> <p>With regards to deliverability, comments stated that only two of the existing four pitches have been delivered, therefore querying the need for additional pitches.</p> <p>With regards to infrastructure, it is suggested that a new criteria is added to the policy which states, “Development will be dependent on the provision of infrastructure for adequate wastewater conveyance and treatment to meet strict standards.”</p> <p>As an alternative approach, it has been suggested that larger site allocations would provide a proportion of Gypsy and Traveller accommodation, akin to the mechanism for providing affordable housing. This would help achieve better spatial distribution across the district. Alternatively, the Council should purchase land to deliver accommodation or use previously developed land.</p>

<p>SA28 Land at Alton Lane, Four Marks</p>	<p>There is particular concern that this site is not large enough to accommodate two pitches. Development is intensive, high density and not in keeping with a rural lane of single dwellings in large plots. The site is not large enough for a garden to be included, and would create a significant adverse impact on the amenities of neighbouring properties. The mobile homes would be too close to neighbouring residential boundaries and dominate them. Concerns raised about potential invasion of privacy, noise, access to daylight and loss of views.</p> <p>The proposal is contrary to planning policy, including national policy. It is outside the settlement boundary, and inappropriate development. A bricks and mortar home would not be permitted here, so Gypsy and Traveller pitches should not either.</p> <p>Concern about the impact of development on the character of the area. Development is out of keeping, and changes the pattern of development in the lane. Concern about loss of trees and hedgerows. It would be difficult to appropriate screen the site, without causing deliberate isolation.</p> <p>With regards to infrastructure, there is concern about flood risk and drainage. No mains drainage or water, and concern about water pressure. The water main in Alton Lane is struggling to cope. Infrastructure has not kept pace with the recent growth in population. There are no footpaths in Alton Lane, presenting significant danger for children walking to school. Speeding traffic is a concern, and overflow parked cars on the lane could present danger. There are no public transport connections.</p> <p>The site is not big enough to provide a play area for children and development will not contribute to healthy lifestyles for residents. The site should not be entirely hardstanding. Concerns about increasing flood risk from hardstanding.</p> <p>Current sites in Four Marks are not occupied. There is capacity in other districts. New sites should be more evenly distributed across the district. The accommodation needs assessment is not robust.</p> <p>Consider cumulative impact from other sites proposed too. A disproportionate amount of Gypsy and Traveller sites are proposed in Four Marks.</p>
<p>SA29 Land North of Boyneswood Lane, Medstead</p>	<p>This development is considered not in keeping with the village and will place a strain on the infrastructure, roads and school. There are currently difficulties with the water supply.</p> <p>There is already overcrowding in the community. The development will invade the privacy of the existing settled community.</p>

<p>SA30 Land at Five Acres and Aurea Norma and Woolhead's Builder's Yard</p>	<p>Many responses raise concerns about the potential impacts of development, including harmful visual and landscape impacts, a lack of respect for the existing settlement pattern, lack of accessibility to local services in the centre of Ropley, economic and operational impacts on the Mid Hants Railway Ltd 'Watercress Line', and the lack of sufficient infrastructure to accommodate the proposed scale of new housing.</p> <p>Comments noted the lack of a mains sewer in Ropley, and it was suggested that this may considerably restrict the development potential (number of homes) of the site. Other infrastructure concerns related to the feasibility of providing safe access for vehicles to/from the A31 and the speed of local internet connections.</p> <p>An error in the proposed capacity of the site (an inconsistency between the draft Local Plan and the Land Availability Assessment) was noted; but notwithstanding the confusion, concern was expressed that additional new housing (beyond that proposed elsewhere in the parish by the Ropley Neighbourhood Plan) would constitute over-provision of housing. It was asserted that the site could deliver 35 new homes (including 40% affordable housing) as well as on-site public open space. However, it was suggested that the proposed phasing of development could delay the provision of much-needed affordable housing. The proposal is achievable and the site is available now, and as such should be considered deliverable.</p> <p>One comment suggested splitting the site into its constituent LAA sites and pursuing their development independently.</p> <p>Some comments suggested that the proposed allocation should be enlarged to include land to the east, which would enable better transport connections (vehicular and pedestrian) between Station Road and Bighton Hill. Other comments suggested that it would be more appropriate to disperse new housing development to other sites across the parish, in-keeping with the existing settlement pattern. Some comments suggested that the proposed development would be contrary to the objectives of the draft Local Plan, or that allocations in more sustainable and accessible locations should be preferred (e.g. Beech).</p>
<p>SA31 Land at Crows Lane, Upper Farringdon</p>	<p>This site is situated within a gap between two parts of the Upper Farringdon Conservation Area.</p>
<p>SA32 Clanfield County Farm, South Lane</p>	<p>There are objections to this site because of loss of privacy to existing properties, adverse impact on visual amenity and over development of the site, which would be out of scale and cause coalescence between Clanfield and Old Clanfield. Other concerns raised are the adverse impact development would have on the character of the countryside, biodiversity and flood risk. The loss of countryside land is of concern, and the adverse impact on the character of the area, the landscape and the SDNP.</p>

	<p>There are specific concerns about potential pollution from traffic, particular with regards to proximity to education facilities.</p> <p>There has already been considerable development in the local area in recent years. More development will impact on the quality of life for existing residents.</p> <p>It is felt that existing infrastructure is not adequate to support further development. The local schools and doctors are already at capacity and, additional pressure would be placed on an already overloaded sewerage system. Increased traffic, highway safety and parking were also a concern. Despite assurances that new development would be supported by infrastructure, there have been adverse impacts.</p> <p>Suggestions that the policy criteria could be strengthened to ensure views to and from the SDNP from public rights of way and other viewpoints are fully considered and that lighting is appropriately designed given the proximity to the Dark Night Skies core, and to Clanfield Observatory.</p> <p>It is suggested that the site can approximately accommodate 100 homes and clarified that the site is in single ownership.</p>
<p>SA33 Land East of Horndean, Rowlands Castle</p>	<p>Some responses support this site stating it is deliverable, helps meet needs and could support a higher number of dwellings. It could also provide both market and affordable housing, and is near to a good highway network. 40% affordable housing needs to be provided for local people.</p> <p>There is concern about infrastructure provision, particularly with regards to doctor's surgery and secondary school.</p> <p>The current drafting of the plan is not clear in terms of the policy requirements for the site and supporting text. The policy should be updated to reflect outline planning application.</p> <p>There is important ancient woodland with natural corridors which need to be kept open; additional planting would be welcomed. This site is within the setting of some listed buildings and any development should enhance their setting.</p> <p>Further comments were received regarding the possible use classes of new buildings on the site and their suitability including introducing some flexibility to enable delivery. Also, some comment regarding possible ways to strengthen the policy.</p>

<p>SA34 Land to the rear of 191-211 Lovedean Lane</p>	<p>There are comments which express concern about the proposed development. There is concern that development would harm the character and appearance of the area. The number of homes proposed is too high, with no need for additional housing in Lovedean. There is over development in the area.</p> <p>The site is rural and forms part of the natural transition/gateway to the South Downs National Park, the maintenance of this landscape is of crucial importance. Development would increase the risk of further creeping development along Lovedean Lane, and have an adverse visual impact when viewed from the road.</p> <p>Many responses were concerned that there is inadequate infrastructure to support this development which would be car reliant and impact on access issues in Lovedean Lane/New Road. Lovedean itself has limited amenities. Comment was also made that the wastewater/sewerage system is currently unable to cope, and development would lead to increased surface water flooding in Lovedean Lane. Development would increase traffic beyond a reasonable level, and there is no bus route. Query whether there is safe access to the site. With groundwater sensitivity, development will require safeguards to protect the public water supply.</p> <p>Comments considered that the number of dwellings is too high and that other nearby sites are sufficient to meet the need.</p> <p>The site is within the setting of the Grade II listed The Old Thatched Cottage. Development should preserve or enhance the setting of this building and include a requirement in the allocation policy.</p> <p>Other general comments are that this site has been turned down on previous occasions and therefore query why is it now included and question its deliverability. However, it is noted in comments that two planning inspectors concluded the site comprises a suitable and sustainable location for housing – the inspector found no technical reason why a scheme of that quantum could not be delivered in a sustainable manner. The site is available now and can be delivered in the first five years of the plan, contributing towards early years delivery.</p>
<p>SA35 Parsonage Farm, Rowlands Castle</p>	<p>There is a possibility that the development of this site would adversely affect the character and appearance of the Conservation Area and Grade II listed buildings.</p> <p>Any non-mains drainage may require a borehole soakaway, which has increased risk to the underlying aquifer. Suggest adding a new criteria to the policy that says, development will be dependent on the provision of infrastructure for adequate wastewater conveyance and treatment to meet strict standards. A Flood Risk Assessment (FRA) is required to assess potential for groundwater flooding.</p>

	<p>Need to ensure that groundwater quality and source is protected. A desk study is required to identify and quantify the presence and risk of solution features. Any risks should be considered at an early stage.</p> <p>The site is available for development. It adjoins the SPB and is in a sustainable location. Development would have no adverse effects on constraints and the access and layout can be designed as to not impact but to enhance surrounding features.</p>
<p>SA36 Land at Cottage Farm, James Copse Close</p>	<p>Responses highlighted concerns about the risk of flooding on the site, specifically surface water flooding on elevated areas and Lovedean Lane, with a flood risk assessment being recommended. Additional comments focused on the protection and sensitivity of groundwater and requirements of investigative study work to identify any potential issues and solutions.</p> <p>Comment was made that the site is located within the Mineral Consultation Area recommending wording in the site policy relating to 'incidental extraction', with reference to the HCC Minerals and Waste SPD.</p> <p>It is asserted that the site is deliverable with access split between East Hants District Council and Havant Borough Council. Not correct to say the site is within joint ownership.</p> <p>Other comments reference concerns about traffic flows increasing in the surrounding area.</p>
<p>SA37 Land North of Woodcroft Farm</p>	<p>Comment was received that the deliverability of the site requires completion of an earlier phase of housing development in Havant.</p> <p>Development would utilise a layout to be consistent with existing dwellings in Havant. It would include an area of open space which would become part of wider green spaces in the Catherington Park development as well as containing landscape buffers, such as with the adjacent ancient woodland of James Copse. Comment indicated the site could encourage connectivity to the key employment centre also adjacent to the site, Havant/Wecock Farm.</p> <p>Two vehicular access points are proposed to the site with pedestrian facilities on the southern boundary. Comment was made that access should be via Eagle Avenue, to utilise the new access road that forms part of the Catherington Park development. Concern was shared that development would result in increases in traffic beyond a reasonable level.</p> <p>Attention was also given to the sensitivity and risk to groundwater with recommendations of investigative study work to identify any potential issues and solutions.</p>

<p>SA38 Land South of Oaklands</p>	<p>It was noted that access to the site via Redhill Road is for pedestrians and emergency vehicles only.</p> <p>Comment was made about the Source Protection Zone, with the need to ensure that the groundwater quality and source is protected. A desk study is required to identify the presence and risk of solution features for the site.</p>
<p>SA39 Land at Oaklands House, Rowlands Castle</p>	<p>The allocation should be phased earlier in the plan period to deliver housing.</p> <p>A Flood Risk Assessment is required due to the risk of surface water flooding and groundwater flooding and this site should only be considered if new flooding and drainage issues have been identified from the new adjoining developments.</p> <p>Comment was made about the Source Protection Zone, with the need to ensure that the groundwater quality and source is protected. A desk study is required to identify the presence and risk of solution features for the site.</p> <p>Sand and gravel extractions should be investigated.</p>
<p>SA40 Land North of Bartons Road, Rowlands Castle</p>	<p>Although some support for this site, there are concerns that development will erode the established settlement gap and extend the urban area of Havant.</p> <p>The extent of the developable area is reduced by adjacent SINC and protected trees. There are opportunities to enhance the river as part of Green Infrastructure, and provide environmental net gain.</p> <p>There is a small area of surface water flood risk along Bartons Road and groundwater flooding. A Flood Risk Assessment (FRA) is required.</p> <p>Need to ensure that groundwater quality and source is protected. A desk study is required to identify and quantify the presence and risk of solution features. Any risks should be considered at an early stage.</p> <p>Delivery should be in line with Havant Borough Council's adjacent allocation. Delivery is reliant on access through a site which is only a draft allocation in the Havant Local Plan, which East Hampshire District Council has no control over.</p>

<p>SA41 Land South of Little Leigh Farm, Rowlands Castle</p>	<p>Although some support for this site, there are concerns that development will erode the established settlement gap and extend the urban area of Havant. However, it is stated that the design of the development can have due regard to the gap.</p> <p>It is important that suitable transport mitigation is provided. The junction should be considered and re-structured to provide suitable visibility. It is stated that vehicle access to the site is from Prospect Lane, which should be noted in the policy.</p> <p>There are opportunities to protect and improve the River Lavant. The adjacent SSSI must be protected.</p> <p>Need to ensure that groundwater quality and source is protected. A desk study is required to identify and quantify the presence and risk of solution features. Any risks should be considered at an early stage. The site is susceptible to groundwater flooding and a Flood Risk Assessment (FRA) is required.</p> <p>Sand and gravel extractions should be investigated.</p> <p>The site will marry up the settlement boundary and existing residential development. The site is in single ownership.</p>
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Development Management (DM) Policies

<p>DM 1 Provision and enhancement of open space, sport and recreation</p>	<p>There is support for this policy, but standards in Appendix 4 should be minimum standards.</p> <p>There were objections to the standards-based approach for identifying the level of sport provision which it was felt does not take account of local context. Comments regarding accessibility requirements were received and the suggestion that the Evidence Base should provide greater clarity / is flawed.</p> <p>This policy attracted many specific comments about long-term funding and resourcing and whether financial contributions should be retained by parish/town councils. The need to support the local green network and specific references to identified needs within the communities and sports clubs were also made. Open space provision should be on site – financial contributions in lieu of on-site provision do not work.</p> <p>Specific suggested amendments to text.</p>
<p>DM2 - Protection of open space, sport and recreation</p>	<p>There is support for this policy, with some suggested amendments to text, including to add flexibility.</p> <p>Other responses suggested the need for cycle paths between Alton and Four Marks and Alton and Farringdon, and paths around Alton and Four Marks are inappropriate. Further comments included that villages are losing their recreational space, financial contribution should not be allowed to compensate loss of open space and Neighbourhood Plans should form part of the Evidence Base.</p>
<p>DM3 - Provision and enhancement of social infrastructure</p>	<p>Specific suggestions with regards to social infrastructure in Alton and the surrounding villages, including the need for a two-way segregated cycle/running/walking path in the centre of Alton plus an all-weather footpath from Alton to Four Marks.</p> <p>The evidence base is lacking and incomplete, with only an interim Community Facilities Study being prepared to support the plan. The evidence does not provide any justification for the policy approach. The Infrastructure Plan should be a key consultation document.</p> <p>Other points raised are that new community provision needs to be guided by comprehensive community facility audits and cultural strengths and under-provision (such as performing arts), should be recognised. Due to over development in several villages, the social infrastructure has been eroded.</p>

	<p>It was felt that the policy was ambiguous in places and does not define certain terms, also there is no reference made to the changing needs of society and places of worship should be specifically referenced.</p>
DM4 - Protection of Social Infrastructure	<p>There is general support for this policy, particularly that cultural facilities have been included in the definition of social infrastructure. Importance was placed on communities retaining their facilities.</p> <p>Suggest considering whether banks/cashpoints can be protected, especially in rural communities, to support older and vulnerable people who may rely on traditional banking and cash for purchases.</p> <p>Some suggested additional supporting text.</p>
DM5 – Amenity	<p>There were a few points suggesting changes/clarification to some wording including the wording ‘unacceptable adverse impact’ needs to be strengthened, and questioning what ‘regard’ means and how it will be weighed and evaluated.</p> <p>Also, responses wanted to ensure that developers and utility companies coordinate plans and that construction plans are implemented.</p>
DM6 - Accessible and adaptable homes	<p>There is not consensus on whether this policy should be applied to all new dwellings or just developments over 10 dwellings, citing that there should be some flexibility as this requirement could not always be met. Justification for the policy is needed.</p> <p>There is not evidence to support the proposal, the policy should meet the criteria in PPG. There is not always demand for properties meeting M4(2) and affordable housing providers may struggle to meet the requirement. Only a proportion should meet part M4(2) otherwise is inconsistent with PPG.</p> <p>Reference was made to some wording which was considered ambiguous but with support for future proofing for ‘lifelong living’ for both market and affordable homes.</p> <p>There is some support for this policy.</p>
DM7 - Residential internal space standards	<p>There is some support for this policy. Adequate internal space supports health and wellbeing and helps to make homes more age- and disability-friendly. However, it is suggested that evidence these standards are required, are viable and can be delivered in a timely manner is provided.</p>

	The policy is too prescriptive and should be more flexible.
DM8 - Self-build and Custom Housing building	<p>The responses questioned whether there is an identified need for self-build and the ability for its delivery on larger sites. The policy should be tightened to ensure the applicants are genuine self-builders although self-build would bring diversity to the street scene. More flexibility is needed in the policy to not affect viability – mechanism needed if self-build plots are not taken up.</p> <p>Various comments about the 5% including that there is no evidence to support 5%, and the 5% requirement should be described as a maximum where the proportion is determined by the 5% requirement or the number required to meet the identified need on the self-build register, whichever is smaller.</p> <p>Further consideration should also be given to the threshold for this requirement (20 dwellings) and its impact on deliverability / effectiveness.</p>
DM9 - Residential Annexes	General support. The Policy will assist in preventing annexes being separated from the dwelling and sold off as additional dwellings.
DM10 - Extensions and replacement of dwellings	<p>In general, there is support for this policy and considered a more pragmatic approach, but objections mentioned that this policy does not prevent multiple extensions and that a percentage which limits the cumulative size of extensions should be adopted.</p> <p>Query how modest extensions are to be defined. The Policy should also state that in the case of replacement dwellings, the original should be demolished.</p>
DM11 - Vacant Building Credit	<p>Support has been received for this policy but also comments mentioned that this policy goes beyond the requirements set out in the PPG and also undermines the intention of it. Also state that there is no need for the policy as it is set out in PPG.</p> <p>The Policy is unsound as it undermines the intention of national policy to encourage the redevelopment of previously developed land and would prejudice the commercial viability of such sites.</p>
DM12 - Conversion of an existing agricultural or other	Support has been received for this policy, but suggestions were made that it needed additional criteria and that proposals are supported by a structural engineer's report. Also, an objection that the policy is too widely drawn - 'other rural building' can be taken to mean any building outside of a SPB and give opportunity to create new dwellings in the countryside.

rural building to residential use	
DM13 - Rural Worker Dwellings	There is support in principle for this policy with the suggestion that a register of residents in rural workers accommodation should be maintained for new dwellings. There is some however that the policy could be open to exploitation.
DM14 - Provision and enhancement of tourism uses	There is support in principle for this policy and some responses made specific reference to wording which it was felt either needed to be added or amended to strengthen the policy.
DM15 - Protection of tourism uses	There is support in principle for this policy. Tourist attractions should engage with EHDC if they are considering closure and buildings used for tourism or leisure uses should not be converted to residential use.
DM16 - Diversification of agricultural or land based businesses	There is support in principle for this policy, but comments mention that there needs to be more reference to other examples of diversification. There is not a consensus as to whether this policy should state that the business remains as a subsidiary or not and there were suggestions for amendments to the wording.
DM17 - New Agriculture Development	There is support in principle of this policy and some changes/amendments to the wording have been suggested. Also suggested that the policy title should be reworded as 'new agricultural development' rather than 'new agriculture development'.
DM18 - Horse-related Development	There is general support for this policy in principle, but it was noted that the criteria must be relevant to scale of the operation and several comments related to possible light pollution and potential impact that horse related development can have on groundwater quality. There were several comments suggesting amendments to the wording.
DM19 - Home-based Businesses	There is general support in principle. There are comments which suggest that the size of an outbuilding should be defined and 'limiting any advertisement' made more specific. Further comments referred to proposals proving there is adequate parking within the curtilage of the property as well as some amendments to the wording.
DM20 - Town, district and local centres	There is support for this policy in principle, but it has been suggested that there should be additional considerations to this policy in relation to hot food takeaways in certain locations. Whitehill & Bordon should be referred to as a town in line with hierarchy. Change of use should exclude B1 use class.

DM21 - Main Town Centre Uses	<p>There is support in principle for this policy.</p> <p>However, also comments that this policy should be amended to reflect the requirements of the NPPF.</p>
DM22 - Alton Primary Shopping Area	<p>Although there is support in principle for this policy, it was noted that this policy is too rigid, needs to allow for more flexible uses and does not address out of town development. Also state that residential uses should not be resisted.</p>
DM23 - Whitehill & Bordon new town centre	<p>There is support for this policy in principle, but it additional wording has been suggested to this policy in relation with regards to hot food takeaways in certain locations, especially given the Healthy Town Status.</p>
DM24 - Gaps between settlements	<p>There is support for this policy but with the suggestion that where a gap applies to a settlement it should be identified and, there is concern at the lack of boundaries. A better definition of gaps is needed.</p> <p>There are responses which relate to specific gaps in the district and suggestions for amendments to the wording.</p> <p>It was felt that this policy does not provide the same level of protection as in the previous Local Plan which is clearer. If this policy was implemented there would be no justification for a major development at Northbrook Park as it would create continuous development from Bentley to Farnham.</p>
DM25 - The Local Ecological Network	<p>It is suggested that this policy needs to be more strongly worded and monitored against any detrimental effects, including preventing the removal of current environmental networks and pathways. Query whether there is a basis for the development of a policy for a strategic solution to deliver net gain. Further policy development could be beneficial.</p>
DM26 - Trees, hedgerows and woodland	<p>There is support for this policy. More protection should be given to trees and hedgerows like that of TPOs, to prevent inappropriate development although, it was noted there is not as much flexibility with this policy as in the NPPF with regards to veteran trees and ancient woodland.</p> <p>Netting trees and hedgerows prior to planning permission begin granted for development should be made illegal.</p> <p>There should be a standard of 1 new tree per dwelling proposed.</p> <p>Suggestions to the amendment and addition of some wording has been made, including suggestion to delete policy sections DM26.2a and 2b as these provide a get out clause to allow development. There is no mention of buffers around ancient woodland.</p>

DM27 - Renewable and low carbon energy	<p>There is general support for this policy.</p> <p>Comments make suggestions that every new development should have renewable energy provision, sustainable carbon neutral developments should be mandatory, and any wind or solar development must be in keeping with the locality and its surrounding area.</p> <p>It was felt that some wording needed to either be clarified or that in some places it was too weak. Some specific proposed amendments to text were received.</p>
DM28 - Resource Efficient Design	<p>There is some support for this policy.</p> <p>It was commented that the objectives of this policy are insufficient to meet the Council's own strategy In relation to climate change and need clarification. There is some objection to the policy, stating that the intent is unclear, and it appears to support all development provided that the technical requirements are met.</p> <p>The Council should go further to reduce water consumption although there is not consensus on the amount per person per day.</p> <p>Specific comments about certain parts of the policy and proposed amendments to text.</p>
DM29 - Water quality and water supply	<p>There is support for this policy to ensure the water environment does not deteriorate from new development and there is adequate water and wastewater infrastructure. Water reuse should be encouraged.</p> <p>Further work should be undertaken to establish if site allocations with no mains connections can be delivered.</p>
DM30 - Residential Design in Low-Density Neighbourhoods	<p>This policy is not needed, as the requirements are referred to elsewhere, notably S27, where reference is made to enhancing local character.</p> <p>Some comments objected to this policy, with comments including that protection should be expanded to proposals of 10 or more dwellings to preserve local character, there is a lack of clarity regarding the meaning of 'surrounding dwellings' – more precise meaning is needed, and the policy could be widened to include clusters of residential development outside of SPBs.</p> <p>Also comments refer to a need to include the prevention of cul-de-sac developments behind ribbon development. The inclusion of minimum plot sizes and some further clarification within the text has also been suggested.</p>

DM31 - Public Art	There is general support for this policy.
DM32 - Residential garden development	<p>In general, there is support for this policy, noting its clarity and that in some areas back land development is out of keeping. However, there is also some objection, stating part of the policy is at odds with the NPPF.</p> <p>Further clarification is requested with regards to point 'e'.</p> <p>It was questioned whether development should be allowed to the front of a dwelling and special consideration should be given to permissions where there is an amalgamation of land.</p>
DM33 - Conservation Areas	<p>There is general support. It was suggested that reference is made in the policy to Conservation Area Character Appraisals.</p> <p>It was noted there is inconsistency in some terminology.</p>
DM34 - Heritage Assets in Conservation Areas	There is general support for this policy.
DM35 - Listed Buildings	<p>There is general support for this policy.</p> <p>The suggestion was made that listed building extensions should be subordinate in scale to the listed building itself.</p>
DM36 - Development affecting and changes to Listed Buildings	There is general support for this policy with suggestions of some minor changes.
DM37 - Advertisements affecting heritage assets	<p>There is general support for this policy.</p> <p>Reference should be made to the National Heritage List for England, maintained by Historic England.</p> <p>There needs to be some flexibility to encourage new retailers and improve vacancy rates.</p>
DM38 - Archaeology and ancient monuments	There is general support for this policy with the suggestion of a minor amendment to the wording to be consistent with the supporting text.

DM39 - Shopfronts affecting heritage assets	<p>There is general support for this policy. The policy needs to make clear that it applies to all buildings in the Conservation Area and not just Listed Buildings.</p> <p>There needs to be some flexibility to encourage new retailers.</p> <p>With regards to Alton, there are some wonderful shop fronts and signs on historic buildings, but it can be let down by poor design and frontages. The high street needs a boost and the look and feel is important to attract people to the town.</p>
DM40 - Historic Landscapes, Parks and Gardens	<p>There is support for this policy with a recommendation for an amendment to the text to ensure consistency with other policies.</p>
DM41 - Telecommunications and digital infrastructure	<p>There is poor coverage in some areas of the district and although it is vital that new developments should have modern connection capabilities, it should not be to the detriment of existing properties who still need an improved level of service.</p> <p>Existing infrastructure should be examined, not just new development. The Ropley Exchange has extremely poor broadband speeds.</p> <p>Reference should be made to landscape. Repeater masts should be installed on major sites to ensure mobile telephone coverage.</p>
DM42 - short term power generation and storage	<p>The principle of short-term power generation and storage is supported, however there will only be a limited number of sites that satisfy the policy criteria.</p>

Chapters and Topics

Foreword	<p>Almost entirely focused on the delivery of residential accommodation. Limited reference to the delivery of employment land for job creation and retail facilities to support the day to day needs of the districts residents.</p> <p>Foreword should be amended to recognise this.</p>
Background	<p>Data gathered for the whole of East Hampshire should not be used to inform the Local Plan, because the plan does not relate to the South Downs National Park which is extremely different in character and background.</p> <p>‘Sustainability’ is scattered throughout this document without any clear definition of its meaning. The definition in the glossary is meaningless. There needs to be a definition that is clear and transparent and can be measured against. Replacing countryside with housing is not sustainable.</p> <p>There are general statements in the draft Local Plan about challenges, new homes, protecting natural environment etc, but the draft Local Plan places too many homes in Whitehill & Bordon which is a sensitive location. The draft Local Plan has failed to spread the housing to all local villages.</p>
Why are we reviewing the Local Plan	<p>New homes are having to be provided because the Government has failed to control excessive population growth.</p> <p>Whitehill & Bordon should not be developed just because the Army is being forced to move out.</p>
Neighbourhood Plans	<p>Some of the proposals and implications of the draft Local Plan are in direct conflict with Farnham's Neighbourhood Plan and Waverley Borough Council's Local Plan Part 1.</p> <p>The ‘made’ Medstead and Four Marks Neighbourhood Plan (2015 – 2028) should not compromise the need for greater housing growth in Four Marks and, if anything, is out of step given its age (i.e. January 2016) and needs to be reviewed in line with the emerging Local Plan.</p> <p>The draft Local Plan should also be more informed by the ‘made’ Neighbourhood Plans, and give greater acknowledgement of these.</p>
Duty to Co-operate	<p>Duty to Co-operate has not been fulfilled. The draft Local Plan has not been shaped by agreements with other local authorities and is therefore not positively prepared, is ineffective and unsound. There is no evidence to support it and appears to be a box ticking exercise.</p>

<p>(including questionnaire Do you have any comments on the Duty to Co-operate at this stage?)</p>	<p>Specific comments have been received by neighbouring councils generally covering the provision of new homes, Gypsy and Traveller accommodation, transport and infrastructure.</p> <p>Comments also focussed on the proposed site allocation at Northbrook Park and evidence that Waverley Borough Council supports this allocation. It is asserted by some that Waverley Borough Council is not supported, and there are no meaningful outcomes from dialogue with Waverley Borough Council on this. There are suggestions that the Duty to Co-operate should be widened to include co-operation with neighbouring Parishes and residents associations close to but outside of EHDC.</p> <p>Concern that EHDC is proposing to absorb all of the SDNP's housing requirement after 2028, commenting that the Duty to Co-operate is a two-way process.</p> <p>Need to understand if there is any unmet housing need from neighbouring local planning authorities. Any unmet need must be considered as part of the Examination of the Local Plan.</p>
<p>Vision and Objectives (including Questionnaire CQ5 Do you have any comments on the vision for the Area up to 2028? and CQ6 Do you have any comments on the strategic objectives?)</p>	<p>Welcome the reference to the sense of place.</p> <p>The vision should include bringing rivers up to Water Framework Directive standards.</p> <p>It is recommended that Objective A ensures a mix of housing is planned, with emphasis placed on including 1 and 2 bedroom houses for first time buyers/people wishing to downsize and low rise homes for the elderly community. It is also recommended that employment and retail is in proximity to proposed developments and supported by local transport to reduce the need to commute long distances. It is not thought that the plan contains enough houses to support Objective A. The objective should also state that the housing target is a minimum, as it is implied that the aim of the draft Local Plan is to only meet this minimum target.</p> <p>In relation to Objective B, comments noted support, but also that housing is not all 4/5 bedroom houses but includes 1/ 2 bed starter homes and low rise for older residents enabling downsizing.</p> <p>In relation to Objective C, comments focused on provision of bus and cycle routes connecting residences with rail stations, to promote sustainable travel for commuting and leisure purposes. The objective should make reference to highway infrastructure. Recommendation was made that infrastructure is built prior to dwellings being occupied and that sufficient time is provided for new residents to integrate into the community prior to the next phase of development. Criticism that Objective C will be achieved as no infrastructure has been identified to support the allocated sites.</p>

	<p>Concerns shared that the site allocations, as well as the plan in general, will not deliver the vision and that it is based on an insufficient housing requirement to support growth. Criticism received about the lack of additional economic development identified in Four Marks and South Medstead. Reference should be made to the provision of retail services and facilities to ensure the need is met for the existing and growing population.</p> <p>Proposed new objective for the conservation and enhancement of the environment, including the historic environment and the heritage assets therein.</p> <p>Propose objective includes reference to home workers, self-employed, and avoiding building in river valleys.</p> <p>Suggested amendments to text.</p>
Spatial Strategy	<p>The draft Local Plan is not consistent with national policy and will not deliver sustainable development in accordance with NPPF. The plan should include further sites to future proof delivery of a possible uplifted housing need in the plan period. Subsequently, if the plan is adopted post March 2021 further years will need to be added to the length of the plan to ensure the minimum 15 year timeframe is met.</p> <p>A mix of comments were received about meeting other Local Planning authorities unmet need, with some support but also some criticism, particularly about accommodating the SDNP unmet need.</p> <p>Failure to deliver an appropriate economic strategy that facilitates the correct amount of jobs in most suited locations. Draft Local Plan focuses on delivering few large employment sites as part of mixed use development, whereas greater consideration should be given to existing areas of employment like Four Marks and South Medstead.</p> <p>Many comments were received criticising the allocation of Northbrook Park due it not being a viable and sustainable development. It is likely that the site will serve Farnham more than East Hants District.</p> <p>Many comments criticised the location of sites and that they are not in suitable locations, due to proximity to SPAs. Development should instead be located within existing settlements.</p> <p>The strategy should not encourage greater amounts of development in areas of the district that are poorly supported by facilities or where the car is relied on as the main form of access, such as in Four Marks, as it will only exacerbate car usage. Preference was instead placed on Liphook and that it should have been allocated additional development due to it being in a sustainable location with existing transport and infrastructure.</p>

	<p>Southern parishes sub area should allocation additional small to medium sites to cate for its associated housing needs.</p> <p>NPPF seeks development to be allocated to lesser environmentally constrained areas. However, large quantities of development have been allocated to the north of the district where the landscape produces constraints of multiple SINCS, the Wealdon Heaths Phase II SPA and the Thames Basin SPA. Provision of SANGs must be considered as well as appropriate mitigation.</p> <p>Some comments that specific villages in the district have received no or very few housing allocations.</p> <p>It was noted that many of the permanent gypsy and traveller sites occur in one ward of the district. Consideration should also be given to specialised housing for the elderly community.</p>
<p>Planning for Places</p>	<p>Concern that there is only one allocation for older persons housing, which is insufficient (SA33).</p> <p>With regards to the reference to the Paddocks, Station Road, Bentley, this proposal requires an Odour survey to be undertaken if development is proposed within 800m of a sewage treatment works.</p> <p>Need much more joined up thinking between planning and transport. Moving away from car use will only happen with a far more integrated public transport policy. E.g, recent developments have been approved in Rowlands Castle on the basis of access to the local station, yet consultations on a planned but aborted new timetable showed fewer trains with a less regular services. Bus services are poor and diminishing. Improvements to current transport infrastructure is key.</p> <p>Allocations do not have regards to extensive development already taken place in places like Alton and Four Marks. Alton has had sufficient development already, without the supporting infrastructure needed to support it.</p> <p>Little consideration in the Local Plan of the outcome of Neighbourhood Plans or Parish Plans – EHDC’s plans may have changed, but the town and parishes’ have not.</p> <p>Developers side step obligations such as affordable housing – the plan should do more to prevent this.</p> <p>Concern that proposed development does not include new bridleways, to enable separation of vehicle traffic from horse riders. This is a particular concern in the southern area (rural roads in Lovedean area, such as Lovedean Lane and Day Lane).</p>

Next Steps for Site Allocations	Alton Neighbourhood Plan is important and properly adopted, and should be fully adhered to regarding maintaining the essential character of the town centre. The sustainable transport elements of the Alton Neighbourhood Plan should also be represented correctly in the new Local Plan.
Strategic and Detailed Policies	There are no targets for healthcare provision, yet there are targets for open space. Policies that contain 'should' need to be changed to 'will' or 'must'.
Economy	There is a lack of employment land. No new employment land has been designated in Bramshott and Liphook Parish.
Natural Environment and Built Environment	Welcome the stronger policies concerning countryside protection including measures for mitigation and long-term management. However, these policies do not support development at Northbrook Park. Policies are missing with regards to dormice protection which is inadequate, swift protection, protection of nesting birds such as swallows and house martins, and there should be hedgehog street scheme on all new developments to maintain garden connectivity. "Natural and built environment" should be "Natural, built and historic environment". Protecting and enhancing the historic environment is integral, part of sustainable development, made clear in paragraph 8 NPPF. Responses stated that greater emphasis should be placed on conserving the natural environment. Should be acknowledged that varying measures can address climate change and currently too much emphasis solely placed on reducing car usage.
Policies Maps	Specific comments have been received with regards to areas in the district and aspects of the maps. Queries about SPB boundaries have been raised, particularly how proposed amendments are shown and can appear inconsistent with other maps. Some comments note objections to proposed SPB changes and amendments in relation to proposed site allocations. Other comments pick up on base mapping issues, such as the absence of the A325 relief road.
Structure and form of the new Local Plan	A range of comments were received including stating that allocations should be after Strategic Policies as the Local Plan is far more than housing and employment, the DM policies should show which S policy they relate to (see SNDP Local Plan)

	<p>with explanation of difference between strategic and DM policies, and the numbering system is confusing (DM policies should be subsidiaries of Strategic Policies).</p> <p>With regards to the overall layout, it is confusing, not user friendly and does not set everything in context. The Landscape Capacity Study 2018 should be given greater prominence and the Strategic Policies should then follow, before housing and employment allocations.</p> <p>With regards to content, the draft Local Plan does not identify any development sites for the older generation to downside to.</p> <p>This Local Plan is much more understandable than its predecessor. Support the distinction between types of policies.</p>
<p>Questionnaire CQ20 Do you have any other comments to make on the draft Local Plan?</p>	<p>The Local Plan does not adequately address the issue of Heritage at Risk.</p> <p>Commitments to positive planning should be expressed in the Local Plan.</p>
<p>Questionnaire CQ19 Do you consider there to be a need for any additional policy?</p>	<p>There should be a policy for developers to include wildlife transit routes in design – gaps for hedgehogs, escape route for deer.</p> <p>There should be greater focus on accessibility and social inclusion, either through a specific policy or as a stronger strand within most of the existing policies.</p>

Areas

Alton	<p>Many sites are located to the south of the settlement, which causes them to be a greater distance from existing infrastructure such as the train station. Subsequently, existing infrastructure is struggling to cope with increases in housing numbers in the area. The Local Highway Authority expressed a desire to work with the Local Planning Authority to ensure that any traffic impacts generated from the proposed developments are demonstrated to be mitigated against.</p> <p>The new community building at the Brewery site should be a replacement for the Community Centre and Assembly Rooms. Concern was also raised about potential isolation and loneliness that can occur to residents as towns expand, this is an issue that should not be overlooked.</p> <p>Objection towards the overall allocation for housing in Alton. There has been substantial growth in the last 5 years and time is needed for the community and landscape to become integrated.</p> <p>Development should not occur on the butterfly field on the Lord Mayor Treloars site. Development on hillsides was objected to and could have an adverse impact on the skyline.</p> <p>Many suggestions were made for alternative sites, featuring areas that are thought to need revitalising in Alton. Emphasis was placed on the importance of prioritising brownfield land and good design. Recommendation was made that an ownership plan is included as a document in the draft Local Plan, as land ownership is considered a key issue.</p>
Beech	<p>A range of comments including the suggestion that the Local Plan should include some allocations in Beech, and support for the proposed amendments to the SPB.</p> <p>Objection to Site Allocation SA19 Brick Kiln Lane and comments that the comments for LAA site BEE-008 on surface water flooding due to topography are misleading.</p>
Bentley	<p>Many comments received about Northbrook Park, generally stating that it would have an adverse impact on many aspects of the surrounding settlement and that it is too big a development to be located near the village. Comment was also made that Northbrook Park is not needed as the Local Planning Authority are planning for more homes than what is required by Government.</p> <p>Development will increase flood risk and could also impact on the natural environment by loss of wildlife. Heritage will also be impacted as listed buildings are in proximity to some development sites.</p>

	<p>There is a lack of infrastructure, particularly health care and education. It is hard to comment on the draft Local Plan without an Infrastructure Plan.</p> <p>Concern made about the adverse impact from traffic congestion, specifically on the A31 and Coxbridge roundabout. Comment was also made about the lack of public transport provision and the impact this has on sustainability, as can contribute to greater dependency on the car.</p> <p>Bentley needs a greater amount of local facilities e.g. shops, employment and office opportunities and a mix of housing such as bungalows.</p>
Bramshott and Liphook	<p>Comments focus generally on traffic, parking and the station. Specifically, Liphook train station car park is full and more parking is needed at the station, commuters to London use Liphook station because there is a convenient rail service, and there is very little evidence presented about increase traffic flows in Bramshott and Liphook. New developments nearby and at Whitehill and Bordon will add increased pressure to the station and parking.</p> <p>With regards to general parking, it is reported that there is growing use of on street parking on Portsmouth Road and on the entrance to the Berg Estate. Decisions cannot be made without evidence of impact on traffic flows.</p> <p>There are problems with traffic passing through the Square and this is not addressed in any of the allocations.</p> <p>All allocations should have regard for Wealden Heaths SPA.</p>
Chawton	<p>It is a disadvantage that the area is split almost equally between planning authorities; EHDC and the South Downs National Park. Site Allocations SA23 highlights the artificial problems caused by both Parish and National Park boundaries.</p> <p>With regards to SA23, it is unfortunate that the proposal is shown as an Alton proposal and on the Alton Plan with no map of Chawton included. The impact of the proposal is almost entirely on Chawton within the National Park with limited impact on Alton.</p>
Four Marks	<p>Four Marks and Medstead suffered from uncontrolled development between 2010 and 2015. It changed the character of the village and put infrastructure under extreme pressure. The Local Plan should not allocate any more homes or only allocate a small number. Agreement regarding the acknowledgement in the LAA of infrastructure pressures. However, also stated that the area is relatively unconstrained and provides a good opportunity for sustainable growth.</p>

	<p>There is general concern about the amount of Gypsy and Traveller pitches proposed resulting in a high concentration in one village, which is disproportionate to the rest of the district. Comments query the needs assessment, stating the need is not proven and there are vacant pitches.</p> <p>Many comments focus on infrastructure provision. Too much development has been permitted and the infrastructure cannot cope. The plan does not address the big infrastructure problems in the village. There are concerns about essential services provided by utility companies, water, lack of mains sewer system, drainage, traffic and access, community facilities (need a new village hall). Comments do note that highway improvements are planned by Hampshire County Council. It is not clear what evidence has been used to conclude that there are highway constraints in Four Marks and Medstead. New services and facilities in Four Marks and South Medstead and a new secondary school in this area.</p> <p>Disappointing that there is no provision for new employment development. There has been a long term erosion of employment space in the settlement in recent decades and only limited provision. Current businesses have no space to expand or accommodate new tenants. There should be an allocation for economic development alongside current and future planned housing.</p> <p>With regards to the proposed Site Allocation in Four Marks (SA25), it extends Four Marks further into the surrounding countryside, exacerbating its current problems by stretching development further. There are better infill opportunities in the village.</p> <p>The Neighbourhood Plan Needs to be updated and kept up to date so Four Marks is not vulnerable to speculative development again. Insufficient regard is given to the Neighbourhood Plan.</p> <p>The area needs to be reclassified as a large service centre.</p>
Horndean	<p>The cumulative impact on transport infrastructure and traffic should be considered.</p> <p>With regards to Lovedean, the draft Local Plan should propose that the northern boundary of the Bargate site (off Lovedean Lane), when projected across Lovedean Lane to the east presents a natural end to the northern extent of any suburban backland in-filling.</p>
Medstead and South Medstead	<p>The Local Plan Review document and its evidence base documents must make a clear distinction between Medstead and South Medstead both geographically and also the role that sites play in the operation of the Service Centre.</p>

	This important spatial distinction is currently absent from the draft Local Plan and the evidence base documents, notably the Settlement Hierarchy Paper and Community Facilities Paper.
Ropley	LAA sites ROP-008 and ROP-009 should be allocated in the Local Plan.
Rowlands Castle	Monitoring information submitted with regards to permissions, occupation, commencement and completions for specific developments with planning permission.
Whitehill & Bordon	<p>Many comments focus on transport and concerns of increasing traffic. Suggestion made that transport schemes such as the Wrecclesham relief road could be required to act as mitigation. Consequently, neighbouring local authorities may seek further financial contributions via S106 agreements once development is implemented. Additional development in Whitehill & Bordon should be supported by public transport, which serves beyond the settlement and is not dependent on subsidies. Increasing traffic flow and additional delays from the new town is thought to be a burden to the roads in Binsted parish, a strategy was promised to combat this but has not yet been delivered.</p> <p>The Whitehill & Bordon Transport Strategy is based and tested on a quantum of development stated in the Masterplan and additional development in the area could impact the delivery of the highway elements of this strategy. A recommendation was made that a new transport assessment and masterplan would be required.</p> <p>Specific comments were made towards sites, namely that site WHI004 (Former Bordon Garrison) has protected birds and WHI015 (Building 84) should be removed as it has the potential to interrupt the green network that links the Hogmoor Inclosure and Croft SINC. Clarity was also sought as to whether the potential sites identified along Oakhanger Road are still under consideration as they are not in the draft Local Plan.</p> <p>Proposals to develop the Croft and Building 84 site does not comply with NPPF due to the impact on the informal path and 'green loop' between the Hogmoor Inclosure and the SANG. Comment was also made that as the Croft has been utilised for bat mitigation it is now not suitable for development.</p>
Other Parishes in A31 Corridor	<p>Support no site allocations in Beech. However, also comment made that should allocate at Beech. Comments that should also allocate land in Lasham as this is a sustainable settlement.</p> <p>There is no provision nor incentive for locals in Northern villages to build houses for downsizing and for your families who want to remain in their villages.</p> <p>Some specific proposed amendments to wording received.</p>

Evidence Base

<p>Questionnaire CQ2 Do you have any questions on current evidence documents?</p>	<p>Comments rather than questions received. In general, it was commented that evidence base documents have not been completed with a bottom up local needs driven approach. Policies are not justified as there are many critical flaws in the evidence base which has informed the proposed spatial strategy and the choice of allocations.</p> <p>With regards to transport evidence base, there are some clarification/details identified which would be needed to understand the robustness of the modelling that is being undertaken. There are also some details that would be required to allow comment on the impacts the local plan and their mitigation will have on the Strategic Road Network (SRN).</p> <p>With regards to the LAA, there is a lack of consistency in the approach to assessing sites. This risk undermining the soundness of the Local Plan.</p>
<p>Questionnaire CQ3 Do you consider any evidence to be missing to further support the Plan?</p>	<p>The following topics have been listed in responses:</p> <ul style="list-style-type: none"> • Historic environment (including a survey of Grade II buildings at risk) • Heritage (including heritage topic paper) • Geology • Hydrology • Transport evidence / analysis • Landscape / landscape impact • Biodiversity • Flood Risk • Contamination • Ecology • Housing needs • Duty to co-operate • Viability of delivery rates • Quantum of development proposed at Whitehill & Bordon • Viability with regards to Northbrook Park <p>It was commented that many evidence base documents are interim. IN addition, the supporting evidence is not relevant to or is out-of-date for purposes of enhancing/protecting the local character, environment and heritage of Whitehill & Bordon.</p>

	More evidence is required to show how the new Local Plan would affect and help to support adopted/emerging Neighbourhood Plans.
Site Assessment, HCC highways	No comment.
Housing and Economic Development Needs Assessment (HEDNA)	<p>Although there were a small number of comments related to economic development needs, most of the comments received were in relation to housing needs.</p> <p>A large number of responses from or on behalf of the development industry considered the proposed housing need was too low. It was considered the standard method for calculating housing need is only a starting point and no account has been taken of other factors that may influence housing need, such as the extremely high need for affordable housing in the district and a relatively lack of affordability.</p> <p>There were a number of comments in relation to addressing needs in the South Downs National Park. Some comments stated that the SDNP requirement was based on an out to date SHMA and that EHDC as the local planning authority should take all of the housing requirements from the National Park for the duration of the plan period. In terms of cross boundary issues, comments were raised that no consideration has been made to meet neighbouring authority's housing needs, particularly PUSH authorities.</p> <p>There is support for identifying a need for accessible and adaptable dwellings, but more information is needed on housing needs of the elderly and those with disabilities.</p> <p>With regard to economic development needs, there is a concern over the qualitative review of the existing stock. Whilst the HEDNA considers the strategic floorspace requirements at a district-wide level, it does not consider unit sizes or local requirements.</p>
Habitat Regulation Assessment (HRA)	<p>Some responses considered the conclusions of the Interim HRA were incomplete, requiring further investigation and that mitigation proposed was insufficient.</p> <p>Some responses made with regards to specific sites namely Northbrook Park, SA8 Hollywater and Whitehill Road, and Whitehill & Bordon, stating that further impacts from these sites on the SPAs should be considered.</p> <p>Other comments stated that it does not appear to have considered the impact of more urbanisation through significant housing and development of the Northern River Wey between Alton and Farnham (the A31 corridor), and it does not</p>

	<p>correctly assess the level of harm that arises from concentrating new development in the north east of the District rather than suitable alternatives. Great care needs to be taken over impact of residential development on heathland; nationally and internationally important. Need to check what 'enhancement' includes, to avoid urbanisation of natural green space and habitats with non-native plantings.</p> <p>Some responses felt further evidence should be considered, such as the Biodiversity Action for Whitehill and the original HRA for Whitehill & Bordon.</p> <p>However, there is support for the method of HRA including the identification of pathways of impact.</p>
<p>Infrastructure Plan</p>	<p>The draft Local Plan needs to include specifics about intended expenditure on infrastructure. Concern was also raised about the phasing of development and how this could impact on funding via CIL receipts.</p> <p>New infrastructure must be identified and planned for as part of the Local Plan process.</p> <p>Many comments were received about specific highway schemes in the district and how these schemes may benefit or dis-benefit other policies in the draft Local Plan. The proposed Alton Western Bypass is not mapped in the plan and it is therefore not possible to see whether it may compromise sites SA19 and SA24. Subsequently, a comment was made that all proposed highway improvements should be mapped in the draft Local Plan and Interim Infrastructure Plan as this will provide increased clarity and cross referencing between the documents.</p> <p>Strategies, policies and site allocations that support alternative modes to the car should be promoted. Increase in traffic flow on the Strategic Road Network (SRN), as a result of proposed development, should be avoided and all reasonable mitigation options should be considered for implementation. Cumulative impacts from committed and proposed development on the SRN should be considered, with infrastructure improvements on the SRN being a last resort. Focus should be placed on reducing the need to travel and ensuring required infrastructure is in place prior to development occurring.</p> <p>Comments were made regarding electric vehicles and the infrastructure that will be required to facilitate these in residences and community facilities. Concern shared about where electric vehicles will park to charge overnight if driveways are not included in proposed residences. Emphasis was placed on local electricity distributors needing to cope with added demand and new locations.</p>

	<p>Regarding healthcare, comments highlighted that many areas of the district are split between multiple regional health trusts.</p> <p>Many responses focused on elements of infrastructure, for different settlements in the district, that are thought to be currently lacking or require greater consideration with regards to proposed developments.</p>
Integrated Impact Assessment	<p>It is illogical in that it claims that anyone can comment on the Local Plan during the consultation period but does not show that issues of exclusion, inaccessibility of lack of engagement have been duly considered.</p>
Land Availability Assessment (LAA)	<p>Many comments made are site specific, particularly focussing on how a site in the LAA has been considered and classified and how it is mapped and described. Information has been submitted relating to planning history, and technical assessment of sites. This is particularly the case for sites where they are considered in the LAA but not proposed for allocation in the draft Local Plan. There is some overlap with comments on the LAA and 'omission sites' (as summarised further on).</p> <p>Generally, comments have raised concern about the lack of evidence to justify discounting sites (primarily those in Four Marks and South Medstead) on infrastructure grounds. It is also said that the conclusions in respect of the provision of services and facilities should also be read alongside the conclusions for LAA site FM-013. The conclusions reached when comparing the two sites are inconsistent and flawed in their accuracy. In addition, comments focussed on the material impact of development in this area on the highway network, asserting that at an individual level, the material impact is negligible. Also, highway improvements works are planned and need to be taken account of. The identification of the two railway bridges to the North of the A31 and the highway junctions between Lymington Bottom Road and Boyneswood Road should not be considered as matters that cannot be overcome, given the recent developments and planning permissions. There are also comments that raise concern about how Four Marks and South Medstead are grouped by settlement. In doing so, it disaggregates those sites located within South Medstead which is functionally, part of the settlement of Four Marks.</p> <p>In some cases, the conclusions reached are inconsistent with the conclusions reached for other sites.</p> <p>PPG cites landscape, but not impact on character as a factor that should be used to assess the potential impact of a site. Purpose of assessment to rule out sites in environmental grounds, it is not a tool for the site selection process itself which should happen under a separate clear and robust methodology. It is a basic principle of the LP system that SHLAAs act as an initial sieve and then the remaining sites are selected for allocation in a transparent way. Given this practise has not been adhered to, the LP is liable to be considered unsound unless this process is revisited. Wording in proforma says "piecemeal" – sites are being promoted through the Local Plan, rather than being piecemeal, it is plan led.</p> <p>The LAA is too residential focussed and does not give enough consideration to economic development.</p>

<p>Omission Sites (sites considered in the LAA but not proposed for allocation in the draft Local Plan)</p>	<p>The majority of comments are continuing to promote these sites for development and inclusion as a site allocation in the Local Plan.</p> <p>As per comments on the LAA, many comments made are site specific, particularly focussing on how a site in the LAA has been considered and classified and how it is mapped and described. Information has been submitted relating to planning history, and technical assessment of sites.</p> <p>As well as suggesting inclusion in the Local Plan, comments have also suggested the omission site would be a better site than another site and should replace it in the draft Local Plan. Comments have generally used accessibility, the assessment of sites in the Sustainability Appraisal, Local Plan evidence base studies and technical studies submitted to support this assertion.</p> <p>Some support for the inclusion of small sites in the Local Plan.</p> <p>Query the assessment of sites in the LAA, suggesting sites have not thoroughly been assessed and scrutinised.</p>
<p>Open space, sport and recreation</p>	<p>A reference to a factual error with regards to Alton Sports Centre / Anstey Park.</p>
<p>Settlement Hierarchy</p>	<p>Comment made that rural settlements are only separated from other settlements in the countryside by a single point, inferring that there is no difference between tiers 5 and 6 in the settlement hierarchy and these two tiers should be combined into a 'rural settlements'. Subsequently, Chawton should not be considered as part of Alton and instead be defined as a rural settlement.</p> <p>Suggestion that if amenities in neighbouring local authorities are considered, then the quantum of new housing in these areas should also be considered. Furthermore, committed development and planned investment should be taken into consideration, as this can impact hierarchy.</p> <p>A number of responses queried why specific amenities had/had not been included in the assessment, as well as the overall ranking result of the settlements.</p> <p>Many responses received stated that Four Marks, South Medstead and Medstead have been incorrectly identified in the settlement hierarchy. The settlement hierarchy is inconsistent when referencing Four Marks, South Medstead and Medstead as it is thought some amenities have been mis-allocated between Medstead and South Medstead, thus impacting scoring and ranking.</p>

Settlement Policy Boundary	<p>There were a small number of comments relating to the methodology of the SPB review, the principles used, as well as the individual changes made to the SPBs.</p> <p>There were concerns that changes should not be made in Medstead or Four Marks as the area has an adopted Neighbourhood Plan. There were also concerns that Lower Froyle had a new SPB proposed to cover the settlement.</p> <p>Most responses related to the site specific proposed changes that had been made to the settlement policy boundaries. Each settlement there were both support and disagreement for the various changes proposed. Many respondents requested further land should form part of settlement policy boundaries, especially omission sites that did not form part of the Draft Local Plan. Other comments were against the inclusion of draft allocations forming part of the SPB.</p>
Strategic Flood Risk Assessment	<p>Development should be directed away from areas at highest risk through the Sequential Test. The PPG requires the Sequential Test and Sustainability Appraisal process should look at other sustainability criteria which may outweigh flood risk issues. Any decisions to allocate land in areas at high flood risk should be given in the Sustainability Appraisal report. This should be set out clearly in the SFRA.</p> <p>A Level 2 SFRA is required to demonstrate the site allocations within Flood Zone 2 and 3 are deliverable and sustainable. Within a Level 2 SFRA, consider those sites that are currently within Flood Zone 1, but adjacent to Flood Zone 2 and Flood Zone 3 and add in current updated climate change allowances.</p> <p>A Level 2 SFRA should assess the impacts of climate change, all sources of flooding, no loss of floodplain storage up to the 1 in 100+cc, appropriate resistance and resilience measures up to the 1 in 100+ appropriate cc level, and no inappropriate development. Site policies need to consider appropriate site layout and design techniques to allow for maintaining or improving the existing storage and flow of flood waters on site without increasing flood risk elsewhere.</p>
Sustainability Appraisal	<p>Comments related to the SA Scoping Report, the Interim SA Report, and the Non-Technical Summary to the Interim SA Report. The greatest number of comments were made in relation to the Interim SA Report document.</p> <p>Comments on the scoping report sought the inclusion of additional information on the topics of biodiversity, communities & well-being, and air quality. Concerns relating to water management were also noted. Changes to the SA topics/objectives were proposed for biodiversity and air quality, with reference to biodiversity net gain and the potential impacts of air pollution on internationally designated biodiversity assets.</p> <p>Comments on the SA's Non-Technical Summary objected in general to its conclusions, to how the four SA options had been scored/rated, and to how SA recommendations had been reached.</p>

Comments on the Interim SA Report were more detailed. They varied from support for how some of the potential development sites had been assessed, to a range of objections relating to the process and outcomes of the SA.

General comments on the Interim SA Report included a request for a clear definition of 'sustainable' by which the options for development could be assessed. It was suggested that the SA lacks a credible and logical methodology and does not meet all the requirements of legislation. Some comments suggested that insufficient consideration had been given to the topic of the economy and employment. Other comments suggested that there had been omissions in the consideration of environmental constraints, or a failure to interpret these constraints correctly. Greater consistency between the sequential test (for flood risk) and the SA process was requested, with reasons for allocating sites at risk of flooding being more clearly articulated in the SA Report.

Some comments criticised the assumptions and reasoning used in describing the housing requirements for the local plan. Brexit was mentioned in connection with a suggestion that a lower housing forecasts should be used. One comment suggested that the SA's approach of splitting the district into three sub-areas (the A31 corridor/north, the north east, and the south) was less appropriate than simply dividing the district into northern and southern areas.

A range of comments were received on the discussions of sites feeding into the selection of options. Some comments were concerned at the brevity of discussions for some sites (e.g. where these sites had ultimately been omitted from the spatial strategy options). A relatively large number of these comments were received in connection with sites in Four Marks & Medstead, describing their perceived benefits. These sites were sometimes favourably compared with the site in Four Marks that's included in the draft Local Plan. A "strategic" development option for Four Marks was also put forward for consideration through the SA and local plan-making processes. By contrast, other comments proposed that Four Marks is an unsuitable location for additional development due to its lack of services, facilities, employment opportunities and transport connections.

Many comments also focused on the appraisals of the options. The Council's decision to select Option 4 as the basis for the spatial strategy of the draft Local Plan was questioned by some in terms of the SA results. Some comments attempted their own analysis in favour of other options; other comments queried the evidence base that informs the results. One set of comments considered the omission of a medium-sized site in South Medstead to undermine the entire process of selecting and appraising reasonable alternatives. In the context of the results, some variations to the options were put forward, including an overall strategy of dispersing growth across the district.

Comments on the SA of the draft Local Plan focused on the details of the appraisals for the policies and proposed allocations. Amendments to the policies for biodiversity have been proposed, with the suggestion that the SA should recognise the potential for significant negative impacts in advance of these amendments being made.

	<p>A number of comments focused on the detailed “red/amber/green” analysis of individual sites in Appendix VI and interpreted the results of this analysis to imply that other sites should have been included in the options for the spatial strategy.</p>
<p>Viability Study</p>	<p>A range of comments have been received, some of which are specific and detailed. Some sought clarification that the methodology conforms to the government guidance, and others stating the document is incomplete and requires further consultation. However, it was also commented that it is not possible for industry stakeholders to ascertain the robustness of the methodology without full disclosure of further information.</p> <p>Viability testing indicates that a differential rate of CIL is required for those sites generating higher levels of existing use value (e.g. employment and residential). Further evidence and reasoning is required to support the threshold land values adopted in the viability study. Proposed levels of CIL are regarded as unsound as they’re based on viability assessment evidence which is not transparent and is incomplete.</p> <p>With regards to costs, the costs adopted in respect of accessibility and wheelchair use should be increased to reflect current day costings. Costs adopted for energy efficiency requirements should be indexed upwards to represent present day costs. The study should recognise the costs associated with the provision of garages. An area allowance should also be made in calculating CIL liability. Abnormal costs are not recognised through a sufficient buffer back from the margins of viability, as should be done to mitigate risks. S.106 costs are under-estimated - £250 per unit is extremely low and without substantiation. Viability study does not appear to make allowance for disposal costs.</p> <p>The assumption that self-build homes would be sold at 40% of market value should be supported by evidence.</p> <p>In terms of engagement, comment was made that there is no transparency of information received as a result of the developer forum – what was collected and how it has been used. Also, engagement with landowners, promoters and developers has been insufficient and should be increased to establish and agree appropriately evidenced benchmark land values.</p>

Appendices

1 Glossary	<p>Multiple suggested additions and amendments were made for inclusion in the glossary.</p> <p>Specific comment was made that the definition of ‘sustainability’ should be strengthened in terms of clarity and transparency. It should also be a definition that can be measured against.</p> <p>Recommendation was made for more precise definition of ‘strategic gaps’, with greater detail being provided of the existing spatial locations. This would aid the interpretation of policies as well as providing greater information of the proposed protection.</p>
2 Housing Trajectory	<p>Some comments are specific to individual sites and windfall allowance, including comment that the outline planning permission for Land east of Horndean has now expired, and that Lord Mayor Treloar Hospital site does not meet the ‘deliverability test’ and Site SA38 Land South of Oaklands is not included in Appendix 2.</p> <p>Some responses questioned the overall deliverability of the homes allocated in the Local Plan, and stating that the draft Local Plan is not effective in resolving a track record of under delivery.</p> <p>Comment made that the Local Planning Authority are planning for the delivery of the required amount of housing rather than exceeding it. Windfalls should be utilised to provide a greater amount of housing, rather than contributing to delivering the required amount. If the historic trend of completions continues then it would result in a lower annual average than required, raising query as to how commitments will assist with delivering the draft Local Plan.</p> <p>The relationship of the existing Local Plan (Housing and Employment Allocations) to allocations in this draft Local Plan was queried, as to why some sites are ‘shown again’ and others are not, querying why Land East of College Close and North of Bartons Road are not included in the draft Local Plan.</p>
3 Guidance on the marketing requirements for change of use	<p>Recommendations made to alter the minimum marketing period of heritage assets to 6 months to prevent unnecessary deterioration and B Use Classes to 24 months.</p> <p>Comment made that to remove potential bias from the developer, the assessment should be carried out by the Local Planning Authority or an independent third party.</p> <p>‘Accessibility’ should not just be measured by ‘distance away’. The nature of linkages is also important for (e.g.) wheelchair users.</p>
4 Open Space Standards	<p>Suggestions included standards for the elderly, to think about inter relationships and to avoid too much human artefact - keeping it to the edge of the site.</p>

<p>5 Vehicle Parking Standards</p>	<p>Some concern that the standards are not realistic, and will lead to on street parking. Many young people are in employment and live with family and need to have a car each. Concern the amount of visitor parking is not sufficient.</p> <p>However, some support stating that these standards are an improvement on previous, and there is benefit in having a more relaxed approach moving away from quite draconian measures. Need to reduce reliance on the car.</p> <p>Spaces should be bigger as cars are getting bigger. More space is needed around cars that are on charge (EV).</p> <p>Does not distinguish between allocated and unallocated spaces. There is more flexibility when parking can reasonably be shared.</p> <p>Many specific suggested amendments to the standards, including that there should be more provision for office parking in Alton, recognition that in the case of conversion (particularly from employment) there may not be sufficient space for parking in line with standards which should not necessarily result in a refusal of planning permission and that the minimum should be 1 space plus 1 space per bedroom to account for likely occupancy and car ownership. It is queried whether there is evidence to indicate that short stay cycle parking should be at 10% of the number of long stay cycle spaces.</p> <p>Specific comments about EV charging included that the reference to electric vehicle charging points for visitors needs clarification as to how the 10% threshold will be calculated, query whether EV charging should be provided in places you would not expect to be able to get petrol/diesel, e.g. Health centres, and how EV will be accommodated if relying on on-street parking.</p> <p>With regards to Transport Assessments, feedback was given on the threshold. Also recommended that there should be recognition of Transport Statements, and more detail about Travel Plans.</p>
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