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## Response from Alton Climate Action Network

Mon 16/01/2023 18:44

To: EHDC - Local Plan <LocalPlan@easthants.gov.uk>

**CAUTION:** This email came from outside of the council - only open links and attachments that you're expecting.

Dear EHDC,

Several committee members of Alton Climate Action Network have responded individually to the online consultation.

We greatly appreciate the effort that EHDC has made to consult with the public and to provide much very helpful and interesting detailed information on the consultation website. We also welcome that climate and environmental issues are now beginning to be given the priority that is essential.

As Chair of Trustees of ACAN, I am emailing to emphasise the following points on behalf of ACAN as an organisation ([www.altonclimatenetwork.org.uk](http://www.altonclimatenetwork.org.uk) – we are a CIO):

**“By 2040 our residents will live in healthy, accessible and inclusive communities, where quality homes, local facilities and employment opportunities provide our communities with green and welcoming places to live, work and play and respond positively to the climate emergency.”**

Whilst we are of course pleased to see responding to the climate emergency included in this vision statement, it does not convey the necessary urgency and priority. The United Nations in its various climate reports has been telling us emphatically that we have only a couple of years to start to instigate systemic change and that carbon emissions need to be slashed by two thirds by 2030. The planet is currently on course for global heating of 2.4 to 2.7 degrees (see last October's UN Emissions Gap Report) which is desperately unsafe. Extreme weather will increasingly destabilise communities unless we take resolute action in the very near future. Please remember the UN Secretary General's phrase from 2021 – “Code Red for Humanity”.

As the earth's climate system breaks down, the dangers are visibly increasing – long droughts, more frequent severe storms and floods, record-breaking temperatures during heatwaves. Greenhouse gas emissions (GHGs) must be reduced by two-thirds by 2030 to give us a chance of keeping global warming below the “safe” level of 1.5 degrees. If we fail, unstable weather will increasingly damage agriculture and therefore food supply; and growing numbers of people will be displaced from areas of the world rendered uninhabitable by sea level rise or desertification.

Reducing greenhouse gas emissions needs to be the top priority for housing and transport policy.

### **CLIM 3 re Net Zero Carbon Development**

We endorse and support PeCAN's detailed comments on this question.

**CLIM4 In the future, should the Council's policies on the design of new buildings focus more strongly on tackling climate change in accordance with the energy hierarchy? (Y/N)**

ACAN very strongly supports the use of the energy hierarchy in the Council's policies on the design of new buildings.

### **CLIM5 and CLIM6**

We strongly support (i.e. responses of “yes”, “happy”) these two questions and in particular the 20-minute neighbourhood concept.

But we are frustrated with slow progress on the LCWIP and on creating safer cycling infrastructure in Alton and between local villages and the town, including routes for cycling to school. ACAN’s group Cycle Alton has made a separate detailed submission on this which we strongly support. Cycle Alton are currently engaging in discussions with HCC and EHDC colleagues to try to facilitate faster progress with improving infrastructure – we are trying to get CIL or S106 funding for a detailed feasibility study into the cycling routes that Cycle Alton has proposed.

ACAN looks forward to learning the outcome of the consultation process and working in partnership with the Council on some of the many vital issues raised by it.

Kind regards



# ALTON Town Council



To: Local Plan Team,  
East Hampshire District Council  
Penns Place,  
Petersfield,  
GU31 4EX

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Alton  
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GU34 1HD

Town Clerk: [REDACTED]

via e-mail

12<sup>th</sup> January 2023

Dear Local Plan Team,

Please find below the response from Alton Town Council in respect of the first part of the Regulation 18 consultation.

The Council has determined that the ATC response should be relatively high level, rather than responding to every individual question posed and as such this submission has been made on this premise.

## **The Vision**

The vision set out in the introduction could be stronger in respect of formulating a development plan which puts the climate change emergency at the forefront of the Council's agenda; "responding positively" does not seem ambitious enough. Mitigating climate change as well as managing the consequences of climate change are both incredibly important.

In creating a plan which is ambitious yet achievable, the vision also needs to be more specific in terms of providing access for all to services and improving infrastructure, especially relating to healthcare provision. The quality of the built and natural environment must also be as strong as it can be within the plan, removing vague terminology such as "welcoming" which is not necessarily measurable.

## **Housing Numbers and Spatial Strategy**

Page three states: "*It is not just about the housing numbers; it is about providing the right homes*" The plan should absolutely be about providing the right type of homes, however, the volume of housing to be delivered is a key component. The standard methodology does not serve East Hampshire well, given the percentage of the area which falls within the South Downs National Park which has minimal provision for new housing as well as the higher affordability ratio within the SDNP area, lack of brownfield sites across the plan area and constraints across a number of settlements in terms of infrastructure to support development.

Give the ministerial statement made on the 6<sup>th</sup> December and the subsequent publication of the open consultation on the reforms to national planning policy, it is the view of Alton Town Council that the emerging local plan must revisit the housing numbers as a matter of urgency. EHDC must develop a locally set methodology to demonstrate the "exceptional circumstances" which apply and in turn devise a revised, lowered, housing requirement. This new locally set methodology should be consulted upon before moving to Part 2 of the Reg18 and the allocations stage as it is integral to the entire local development plan.

Alton Town Council should like to also request the Council consider that when revising the housing numbers, it should be taken into account that Alton has consistently over provided relative to the JCS number, which should be borne in mind in the overall strategy for the emerging Local Plan and site allocations.

When looking at the spatial strategy, it would be our preference to see a bottom-up approach to housing distribution rather than the top-down approach put forward in the plan. As the largest settlement in the plan area, it is our view that the town may be willing to take its fair share of development, but those best placed to determine site allocations within our locality are our own community. In addition, our infrastructure currently lags significantly behind development and this must be addressed as part of any future development applications. Whilst green spaces, sports facilities and community facilities can to a degree be delivered at a local level utilising CIL and grant funding; improvements to utilities, transport and healthcare in particular need addressing and this requires improved dialogue with these providers to ensure their delivery as CIL alone will in no way meet these project costs.

### **Responding to the Climate Emergency**

It is also unclear how this “green” plan differs from the Future Homes and Buildings Standard which will come into force in 2025, which will mean all future homes are net zero ready. In addition, in defining net zero carbon to a higher standard than that imposed by building regulations how does the Council see it being able to enforce this when it has not been possible to date to compel developers to exceed national standards and it is likely that viability assessments will be used to undermine any such policies within the plan. There should also be caution in a policy which advocates planting of more trees and landscaping without caveats. Planting trees is easy, keeping them alive and future maintenance costs must be recognised and worked into planning permissions. A recent report in the national press stated “The deaths of trees planted for carbon offsetting purposes also raises concerns that councils and businesses may be able to greenwash their pollution, by claiming to have offset their emissions with trees that do not survive”

### **20-minute neighbourhoods.**

The concept of 20-minute neighbourhoods may potentially set unrealistic expectations which cannot be achieved currently even in the largest settlements. We have seen that it is not commercially viable for some businesses, particularly entertainment to survive in such a small catchment area as Alton and unless there is a huge change in behaviours and people stop using on-line services as a default for shopping and entertainment there will be limits as to what can be provided within walking/cycling distance. Even the shift since the pandemic to hybrid working has not demonstrably increased footfall in town centres when people are working locally rather than in London or other cities/large towns. The 20-minute neighbourhood would also be predicated on a huge investment in cycling and walking infrastructure to make it safe and convenient to use this form of travel over private car use for short journeys.

### **Housing Types.**

The mix of tenures and property sizes needs to be reconsidered in relation to “affordable” housing. It would be interesting to know how many shared ownership affordable houses are still classified as affordable after the first ten years and how many have been purchased outright, decreasing the stock of affordable properties over time.

Clearly the higher the provision of properties the more affordable they become in terms of market supply and demand; on that basis the Local Plan should be seeking to achieve the highest percentage of affordable housing that is sustainable and achievable. The 40% target seems to have been able to be delivered in a number of developments so this should remain.

The mix of sizes of affordable housing should also be more focused on the delivery of smaller properties. With people living longer, a larger stock of one and two bed properties enables both younger people and those downsizing from family homes in later life to be accommodated, which in turn frees up the larger affordable units for families. Adaptable housing would of course be preferred but there is suspicion over the use of viability assessments may render this objective untenable. Affordable housing provision has historically been an issue in the development of age specific housing; a good example of this is the retirement complex built on the former magistrates’ court site in Alton, where on-site affordable housing was unable to be delivered as the development imposes service charges which do not align with “affordable” schemes and then viability assessment was used to consider whether a commuted sum for offsite provision was attainable. If age specific housing is to continued to be delivered or indeed specific policies relating to

their provision created, there needs to be a requirement to provide affordable housing to be delivered as part of the overall development, otherwise these later life schemes will continue to be “exclusive” and add further burden to the number of affordable housing needed as part of the overall delivery within East Hampshire.

### **Other Comments**

The section on how CIL is providing the infrastructure to support population growth unfortunately unrealistic. While CIL funded projects are very welcome, they are far too small in number and scope to meet all the needs of a growing community. Infrastructure has fallen way behind population growth over the last 20-30 years and is continuing to fall further short.

The plan also needs to be alive to the growing default position by developers of using viability assessments as a trump card to overcome policies which they do not agree with. As such, there is a real risk that we will continue to build thousands of new homes that are, unsuitable for supporting their residents through changing life circumstances and of poor quality and longevity. The policies contained within the plan should be robust enough to stand up to such scrutiny by developers; it is not enough to have a “green” plan or a plan for “beautiful homes” in design terms if it cannot be enforced.

Yours sincerely,



 – Town Clerk

For and on behalf of Alton Town Council

East Hampshire Local Plan 2021-2040  
Issues and Priorities (Regulation 18 Consultation – Part 1)

**Comments by Beech Parish Council – 19<sup>th</sup> December 2022**

Beech Parish Council may be contacted at:

██████████ – Parish Clerk  
Old Stables, Wield Road, Medstead, Hampshire, GU34 5NJ

Email: [clerk@beechpc.com](mailto:clerk@beechpc.com)

**Local Plan 2040 Vision**

**VIS1** How do you feel about this vision? **Unsure**

**VIS2** Does the vision cover the key matters of importance that the Local Plan can influence and inform? **No**

**VIS2a** If no, please tell us what is missing from the vision and why this is important.  
**Communities should be “healthy, accessible, well-connected and inclusive”. The ability to travel easily, with adequate transport infrastructure is important.**

**VIS3** Should the vision be more specific about areas of the District being planned for through the Local Plan? **No**

**VIS3a** Please explain your answer. **The geographical scope of the Plan is made clear elsewhere.**

**Issues and priorities**

**OV1** Please rank these key issues and priorities in order of importance to you.

<u>Issue</u>	<u>Rank</u>
Climate Emergency	<b>1</b>
Population and Housing	<b>1</b>
Types of Housing Needs	<b>1</b>
Environment	<b>1</b>
Infrastructure	<b>1</b>

**As a parish council, all of these are important to us and we would not wish to compromise on any one issue in favour of another.**

**The Climate Emergency**

**CLIM1** Do you agree that new development should avoid any net increase in greenhouse gas emissions, wherever practicable? **Yes**

**CLIM2** What's most important to you? Please sort in order of importance to you.

	Rank
That the construction of new buildings should use less fossil fuels and more recycling of materials	3
That all new buildings should be zero carbon	1
That every new development should have renewable energy provision and that any wind or solar development must be inkeeping with the locality and its surroundings	2
That climate change policy should clearly identify the impacts on water availability, with water consumption being reduced in new developments, including by reusing it on site	5
That trees and other green infrastructure could play an important role in reducing flood risks	4

### Defining 'Net Zero Carbon Development for the East Hampshire Local Plan

**CLIM3** Do you agree that the Council should define 'net-zero carbon development' in this way? **Yes**

**CLIM3a** If you answered 'no', how should the definition be improved?

### The Energy Hierarchy as an approach to mitigation

**CLIM4** In the future, should the Council's policies on the design of new buildings focus more strongly on tackling climate change in accordance with the energy hierarchy? **Yes**

**CLIM4a** If you answered 'no', how should we balance the design of new buildings with the need to tackle climate change?

### Adapting to a changing climate

**CLIM5** Should the detailed criteria for tackling climate change be specified in any of the following?

	<u>Yes?</u>	<u>No?</u>
In the emerging East Hampshire Local Plan	<b>Yes</b>	
In future neighbourhood plans	<b>Yes</b>	
In local design codes		<b>No</b>

**CLIM5a** Please can you explain your answer.

**Let's not create any more planning documents. Let's keep the Local Plan as the definitive document for EHDC planners, and Neighbourhood Plans the definitive document for town and parish councils.**

### Emphasising accessibility on foot and by bike

**CLIM6** How do you feel about using the idea of living locally to influence the location of new homes? **Unhappy**

**CLIM6a** Please explain your response.

**The "20 mins" concept is of limited value in a rural area like East Hampshire (as opposed to in larger towns and cities). Having facilities 20 mins away by bike isn't much use to someone who is physically unable to cycle; only "within 20 mins on foot" is of universal use. But all villages will be more than 20 mins away on foot from facilities in larger centres, so the concept isn't really of much use at all to villages. The concept is, however, very relevant within Alton and within**



Whitehill/Bordon (which have a wide range of facilities), and can usefully act to prevent far-flung urban sprawl.

### **Environment**

**ENV1** Which of the below environmental considerations is most important to you? Sort in order of importance.

	<u>Rank</u>
• Achieving improvements to local wildlife habitats.	1
• Protecting the most vulnerable existing protected habitats and species.	1
• Conserving the character of rural landscapes.	1
• Creating better natural links between existing habitats.	1

**As a parish council, all of these are important to us and we would not wish to compromise on any one aspect in favour of another.**

### **Population & Housing**

**How is Housing Need calculated?**

**POP1** Please select how you think we should proceed:

- Use the standard method for calculating housing need as the basis for determining the requirements against which the five-year housing land supply and Housing Delivery Test are measured.
- Further explore whether exceptional circumstances exist to be able to devise a revised local housing requirement. **Take this option**

**POP1a** Please explain your answer.

**It appears that the Levelling-Up & Regeneration Bill will now permit LPAs to reduce housing numbers (below the result derived from the standard method) if there are exceptional circumstances (such as constraints imposed by national parks). And the 'duty to co-operate' is to be removed.**

**The standard method may still be an appropriate basis of calculation across the entire district. But 27.5% of the calculated need should be assigned to the part of the district within the SDNP, to match the proportion of the district's population that lives in the SDNP area (this would mean 174 new homes p.a. in the SDNP, rather than c.115). This would spread development on an equitable basis for the entire district's population. Continuing underprovision of new housing for the population in the SDNP will only serve to increase house prices in the SDNP, exacerbating the affordability problem there and increasing the district's overall housing need in a self-reinforcing cycle.**

### **Local Housing Needs**

**POP2** Are there any strong reasons not to use the housing need figure of 517 new homes per year for the local plan? **Yes**

**POP2a** Please explain your answer.

**It appears that the Levelling-Up & Regeneration Bill will now permit LPAs to reduce housing numbers (below the result derived from the standard method) if there are exceptional circumstances. And the 'duty to co-operate' is to be removed.**

Even if the standard method were to be used in respect of the entire district (632 new homes p.a.), we believe that the assignment of 517 new homes p.a. to the LPA is the result of a flawed calculation, as follows.

In the 2022 HEDNA, the consultants attempt to split of the district-wide 632 new homes p.a. between the LPA and the SDNP. When calculating the household growth figure in each sub-area, the consultants assumed that the future population growth rate in the LPA will be double the growth rate in the SDNP (paragraphs 5.44 and 5.45). This is based on the relative population growth rates observed in the period 2011-2020. But for most of that period (certainly since the MOU signed between EHDC and SDNPA in 2015) the LPA area was explicitly building extra houses to meet a significant proportion of the SDNP's housing need, which in turn must have been a significant contributing factor to the higher population growth in the LPA in 2011-2020. In other words, the historical population base data used by the consultant is skewed, in that it reflects the deliberate displacement of housebuilding from the SDNP to the LPA. The historical base data reflects the SDNP not meeting its own housing need, and so (logically and inevitably) the numbers resulting from calculations extrapolating that historical base data (i.e. only 115 p.a. for the SDNP) cannot reflect the SDNP meeting its own housing need in the future. Skewed data input means skewed data output.

In our view, this completely invalidates the 517/115 split of the 632 new homes p.a. housing need figure. In our view the most sensible and reasonable way to split the 632 number (or any other substituted district-wide number) is on a proportionate population basis, i.e. SDNP 174 p.a. (27.5%), LPA 458 p.a. (72.5%). If the LPA and the SDNP were each to accommodate their own housing need in full, we don't see any credible reason why East Hants population growth rates in the SDNP and the LPA would differ. In the HEDNA, the consultants themselves confirm that the entire district is a single Housing Market Area, which implies that assigning differing population characteristics to the SDNP and LPA is an artificial concept.

In addition the Local Plan should be made flexible enough to take into account changes (during its term) to housing need figures brought about by:

- Affordability improvement following house price movements (better affordability = reduced new housing need);
- A change to the need calculation methodology mandated by Government;
- Changes to any co-operation agreements with neighbouring planning authorities;
- Abolition by Government of top-down housing targets (which appears to be happening already).

In practical terms this means deferring the nomination of named housing sites that would be developed more than, say, 10 years in the future, to permit future reductions to housing need to be accommodated.

### **South Downs National Park (SDNP)**

**POP3** Should we meet:

- All the housing needs of East Hampshire's part of the SDNP.
- Some of the housing needs of East Hampshire's part of the SDNP.
- None of the housing needs of East Hampshire's part of the SDNP. **Take this option**

**POP3a** Please explain your answer.

It would seem that the Levelling-Up & Regeneration Bill will remove the 'duty to co-operate' with the SDNP. The SDNP should be obliged to take their full allocation of 174 new houses p.a. calculated as from 2021, 27.5% of the total district housing need (i.e. proportionate to the

population living in the SDNP). Otherwise the SDNP constrains some of the more sustainable site options around our larger settlements (Alton, Liphook, Horndean, Four Marks) and so forces development onto non-SDNP greenfield sites that are, in reality, of equal landscape value to the SDNP.

### **Unmet needs of other planning neighbours**

**POP4** At present we do not know the precise amount of unmet need but we are aware of our neighbours seeking help, therefore do we:

- Offer to assist with all unmet needs, regardless of scale and location.
- Offer to assist with some unmet needs, where there may be a direct relationship with the communities of East Hampshire.
- Do not offer to assist with any requests from our neighbours. **Take this option**

**POP4a** Please explain your reasons.

**It would seem that the Levelling-Up & Regeneration Bill will remove the 'duty to co-operate' with neighbouring LPAs. In any case, LPAs with brownfield sites should be the ones offering help to neighbours. East Hampshire doesn't have much in the way of brownfield sites, so any unmet needs of others would only be met by even more greenfield development in East Hants, which is not acceptable. In fact, if the SDNP continues to fail to take its fair share, it is some of our more urban neighbours, with more brownfield sites, who should be meeting some of East Hampshire's housing need.**

### **Types of Housing Needs**

#### **Ageing Population and Older Persons Accommodation**

**HOU1** What should a specific policy on older persons accommodation include?

- A specific target in terms of numbers of homes for older persons accommodation to be delivered within the plan period.
- Specific types of homes to be provided.
- The location of these homes across the District.

**All of these**

**HOU1a** Please explain your reasons.

**There needs to be a good spread of all types of older persons' accommodation right across the district, to cater for a range of needs:**

- **Accessible houses/bungalows for independent living**
- **Sheltered housing (with warden oversight) for semi-independent living**
- **Residential care homes**
- **Nursing care homes**

**HOU2** Is there anything else that should be included in this policy?

- **Associated green space (grounds & gardens) and security measures.**
- **Taking proper account of the contribution to housing made by residential and nursing homes (i.e. a 50 bed new care home counts the same as 50 new houses/flats in the context of new housing provision numbers).**
- **Suitable and convenient transport links associated with accommodation for older people.**

## Housing Needs of Disabled People

**HOU3** Should the Local Plan include a specific policy on adaptable housing? **Yes**

**HOU4** Should there be a requirement on large sites for a percentage of new homes to be adaptable? **Yes**

**HOU4a** Please explain your answer.

**Primarily there needs to be a requirement on most (or all) sites that have good and/or close access to facilities and services (which is especially important for disabled people), not necessarily just on large sites. This may mean that a particularly accessible site could have a large % of adaptable housing. It is site accessibility, not site size, that is the most important factor here. Ideally all large sites would be made highly accessible to facilities and services.**

## Home Sizes and Mix

**HOU5** Should the Local Plan include a policy to specify the percentage of smaller homes on development sites? **Yes**

**HOU5a** If yes, should this percentage focus on:

- 1-2 bed homes **This one**
- 2-3 bed homes

**HOU6** Should a percentage of smaller homes to be provided on:

- All development sites or
- Only large development sites (over 10 units) **This one**

**HOU6a** Please explain your answers.

**Smaller houses should be grouped together. Try to avoid having one or two small houses within a group of up to 10 larger houses – it would be incongruous.**

## Affordable Housing

**HOU7** The current requirement is that 40% of new homes on qualifying sites are affordable homes. Should the % requirement for affordable homes be:

- Increased
- Decreased
- Stay the same **This one**

**HOU7a** Please explain your answer.

**40% is a relatively high proportion, but unfortunately is likely to be negotiated downwards by developers on many sites. 40% may be as high as developers can be pushed if they are not going to be put off continuing with the development. (Although there may be some smaller sites, like rural exception sites, where 100% affordable housing is justifiable and achievable).**

## Other forms of housing

**HOU8** There are other forms of housing that we are required to consider and plan for if needed, including self and custom build plots and Traveller accommodation. Are there any other forms of housing that the Local Plan should refer to? **Yes**

**HOU8a** If yes, please state.

- Seasonal agricultural workers (housing on farms)
- Holiday cottages/hotels/other tourist accommodation
- Conversion of office and retail buildings to houses/flats

### **Development Options**

**DEV1** Please rank these options in order of preference

	<u>Rank</u>
• Option 1: Disperse new development to a wider range of settlements	1
• Option 2: Concentrate new development in the largest settlements	3
• Option 3: Distribute new development by population	2
• Option 4: Concentrate development in a new settlement	4

**DEV2** Why have you ranked the options in this way?

**We like Option 1 because it probably means that Alton can expand without the excessive sprawl that would be implied by Option 2 (and to a lesser extent by Option 3). Option 4 would mean a completely new settlement location, totally greenfield, probably in the Northwest of the district on high value farming land (because of heathland and other environmental constraints elsewhere), and possibly creating the unwanted “A31 conurbation” of a string of settlements separated by negligible gaps.**

**DEV3** Are there any alternative options we should consider? **No**

**DEV3a** If yes, please explain.

### **Infrastructure**

**INF1** What type of infrastructure is most important to you? Sort in order of importance.

	<u>Rank</u>
Transport	1
Health	1
Schools, colleges	1
Community facilities	1
Sport	1
Green spaces	1
Energy supplies and water	1
Internet and mobile phone reception	1

**We consider that adequate provision of all of these types of infrastructure is absolutely essential in a modern civilised community, and so they cannot be differentially ranked.**

**INF2** How do you feel about the allocation of CIL funds to date? **Happy**

**INF3** Which of these do you think provides the best outcome for infrastructure provision?

- Many small sites dispersed across the district
- Medium sized sites
- Large sites
- A mix of these **This one**

**INF3a** Please explain your answer

So long as EHDC maintains a well-controlled and predictable process for assigning CIL funds then the appropriate infrastructure provision can be planned for sites of all sizes. This means EHDC working with the developers of small and medium sites on the appropriate use of the developer's CIL contributions at the development planning stage.

## Local Plan Issues and Priorities Consultation

Thu 12/01/2023 17:01

To: EHDC - Local Plan <LocalPlan@easthants.gov.uk>

**CAUTION:** This email came from outside of the council - only open links and attachments that you're expecting.

Please see below the comments from Bentworth Parish Council, please acknowledge receipt.

### **Bentworth Parish Council comments on the EHDC Local Plan consultation.**

#### **Context**

Bentworth is a small village of approximately 200 homes, situated in a rural setting approximately 4 miles to the north of Four Marks and 4 miles to the northwest of Alton, and is surrounded by farmland. The Parish Council would like to make the following comments on the Local Plan, which we have grouped into three principal headings: infrastructure, the need to consider the impacts of planning decisions on neighbouring communities, and the sustainability of development in our area.

#### **Infrastructure**

Our current infrastructure is already woefully inadequate. The local roads are in a shocking state, full of potholes; there is no public transport apart from the school bus that only operates in term time, and a local service that serves the village once or twice a week; local healthcare services (doctors and dentists) are at or over capacity; and schools are similarly oversubscribed. Increasing the number of homes without first addressing the infrastructure will only cause an already failing system to collapse further.

#### **Impact of development in other locations**

EHDC must take a holistic view of the challenges when proposing further developments in towns such as Four Marks. The road through Bentworth already serves as a rat-run between the A31 and the A339 for cars, vans and even HGVs. In 2022, we recorded 474,191 traffic movements through the village, which equates to an average of approx. 1,300 vehicles per day (and because this is an average, some days will be higher than that figure). We already have a problem with speeding: over the year we recorded ~58,000 vehicles exceeding 36mph, with ~520 of these exceeding 50mph, all of these in a 30mph area. Additional development in the region, and in Four Marks in particular, will only make this worse.

#### **Sustainability of development**

Bentworth has no shops, no schools other than a small primary school, no healthcare and inadequate public transport. We have several listed buildings, a conservation area, and no space for development within the settlement boundary. As mentioned above, the local infrastructure is already inadequate. Building additional homes in our area is unsustainable. We would resist suggestions that land be made available for housing and would like to see Bentworth at the bottom of any proposed hierarchy.

Kind Regards

East Hampshire Local Plan 2021 – 2040 Consultation  
**CVRA Response January 2023**

The consultation document comprises some 70 pages with 48 questions (which can all be seen on line). This extract gives us a chance to comment on the main points, which will then be submitted online on Thursday 12<sup>th</sup> January, 2023. Suggested answers following our discussions are in **blue**

**1. Proposed Vision**

***“By 2040 Our residents will live in healthy, accessible and inclusive communities, where quality homes, local facilities and employment provide our communities with green and welcoming places to live, work and play and respond positively to the climate emergency.”***

**VIS1** How do you feel about this vision? Very Happy / **Happy** / Neutral / Unhappy / Very Unhappy

**VIS2** Does the vision cover the key matters of importance that the Local Plan can influence and inform?  
**YES/N** **Though it could also include transport and infrastructure (e.g. internet) but would then become too wordy**

**VIS3** Should the vision be more specific about areas of the district being planned for through the Local Plan? **Y/NO**

**VIS 3a** Explain your answer. **These matters are dealt with later in the consultation, though we are concerned that the presence of the SDNP in our area severely restricts opportunities for planning.**

**2. Overview**

There are five key issues for consultation each dealt with in turn: Climate Emergency; Population and Housing; Types of housing needed; Infrastructure; Environment.

**OV1** Please sort these issues in order of importance to you  
**All equally important**

**3. Issues and Priorities**

**Climate Emergency**

**CLIM1** Do you agree that new development should avoid any net increase in greenhouse gas emissions wherever practicable?

**YES / N**

**CLIM2** What is most important to you:

That the construction of new buildings should use less fossil fuels and more recycling of materials

**4. Ideal but difficult to achieve**

That all new buildings should be zero carbon.

**5. Most difficult to achieve**

That every new development should have renewable energy provision

**2. Sensible and achievable**

That climate change policy should clearly identify the impacts on water availability with water consumption being reduced in new developments, including by reusing it on site.

**1. Sensible and achievable**

That trees and other green infrastructure could play an important role in reducing flood risks

**3. Certainly true**

**CLIM3** Do you agree with the Council’s definition of Net Zero Carbon Development?



As it is used nationally, YES

**CLIM4** In the future should the Council's policies on the design of new buildings focus more strongly on tackling climate change in accordance with the "Energy Hierarchy"?

Y / NO

**CLIM4a** The "Energy Hierarchy" does not mention the need to expand electricity power grid to cope with the increased use of electric cars and the phasing out of natural gas for central heating.

At the same time we need to watch out for the impact of building a massive interconnector in Lovedean

**CLIM5** Should the detailed criteria for tackling climate change be specified in any of the following? East Hampshire Local Plan; Future Neighbourhood Plans; Local Design Codes?

YES to all three

**CLIM6** How do you feel about using the idea of living locally to influence the location of new houses?

Neutral

**CLIM6a** Explain your response This is a good idea but difficult to achieve with very few buses in our area, few cycle tracks and many roads without pavements

**Population and Housing** (Several pages describing how likely populations are calculated)

**POP1** How do you think we should proceed?

Use the standard method for calculating housing needs as the basis for determining the requirements against which the five-year housing land supply and Housing Delivery test are measured.

Probably

Further explore whether exceptional circumstances exist to be able to devise a revised local housing requirement

No

**POP1a** Explain your answer

This sort of exercise would be very technical and then discounted by others

**POP2** Are there strong reasons not to use the housing need figure of 517?

NO

**POP3** Should we meet:

all the housing needs of EHDC's part of SDNP?

some of their needs?

None of their needs?

**POP3a** Explain your answer

In order to survive all communities need some new housing; the villages of SDNP can easily manage their allocated figure of 115 (as opposed to their current 100).

The SDNP has over 50% of the land area in East Hants but is taking less than 20% of the housing. Liss and Petersfield in particular are very sustainable areas to develop as they have mainline railway stations and ready access to the A3. Both of these need to grow with suitable housing – probably for first time buyers or elderly residents to down size – so that young people can remain in the communities and maintain a broad range of age groups so that the existing facilities continue to thrive.

Fundamentally, the split of future housing between EHDC and SDNP is disproportionate to the current distribution of the population and extending the settlement policy boundary for Liss

and Petersfield can readily be done without any detriment to the large open areas of the SDNPA that span East Hants

SDNP needs money to maintain its infrastructure (roads etc) and build suitable housing for younger people to buy.

### **Unmet needs of other planning neighbours**

**POP4** Do we:

Offer to assist with all unmet needs of neighbouring housing areas

Some .....

**None**

**POP4a** Explain your answer

**Once we start, those areas may take for granted our willingness to take even more houses. They will not be funding the extra infrastructure needed.**

### **Types of Housing needed**

#### **Ageing population and older persons accommodation**

**HOU1** What should a specific policy on older persons' accommodation include?

A specific target in terms of numbers of homes for older persons' accommodation to be delivered within the plan period?

Specific types of homes to be provided?

The location of these homes across the district?

**HOU1a** Explain your answer

**Developers need to have requirements spelt out**

**HOU2** Is there anything else that should be included in this policy?

**Accommodation for older people should be near shops, bus routes, doctors' surgeries and pharmacies.**

#### **Housing needs of disabled people**

**HOU3** Should the Local Plan include a specific plan on adaptable housing? **YES**

**HOU4** Should there be a requirement on large sites for a percentage of new housing to be adaptable?

**YES**

**HOU4a** Explain your answer

**Developers need encouragement**

**HOU5** Should the Local Plan include a policy to specify the percentage of smaller homes on development sites?

**YES**

**HOU5a** Explain your answer

**In order to exist as a community, villages have always needed a mix of accommodation/**

**HOU6** Should the percentage of smaller homes to be provided be

**On all development sites**

Only larger developments?

**HOU6a** Explain your answer

**See above**

#### **Affordable Housing**

**HOU7** The current requirement is that 40% of new homes on qualifying sites are affordable. Should this percentage be: increased / decreased / **stay the same?**

**HOU7a** Explain **Surveys seem to indicate this is about right**

**HOU8** Are there any other issues the housing plan should cover?

**YES**

**HOU8a** Please clarify

**There seems to be no reference to use of brown field sites**

#### **Infrastructure**

**INF1** What sorts of infrastructure are most important to you?

<b>Transport</b>	<b>5</b>
<b>Health</b>	<b>2</b>
<b>Schools</b>	<b>6</b>
<b>Community facilities</b>	<b>7</b>
<b>Sport</b>	<b>2</b>
<b>Green Spaces</b>	<b>7</b>
<b>Energy supplies and water</b>	<b>1</b>
<b>Internet and mobile 'phone reception</b>	<b>4</b>

#### **4. Development Strategy and Spatial Distribution**

**DEV1** Please rank these options in order of preference

<b>Option 1</b> Disperse new developments to a wider range of settlements	<b>3</b>
<b>Option 2</b> Concentrate new developments in the largest settlements	<b>1</b>
<b>Option 3</b> Distribute new developments by population percentage	<b>4</b>
<b>Option 4</b> Concentrate new developments in a new settlement	<b>2</b>

**DEV2** Why have you ranked the options in this way?

**For communities to keep their identity, it is important that they are not overwhelmed by new housing. They should be constructed within easy reach of rail and road systems.**

**DEV3** Are there any alternative options we should consider?

**YES**

**DEV3a** If yes, please explain.

**If global warming has the effect on sea levels anticipated, then large areas to the south of our district will be subject to flooding; in effect EHDC could become the "South Coast" We should at least consider the possible impact.**

**GEN 1** How do you feel about this consultation? Very Happy / Happy / **Neutral** / Unhappy / Very Unhappy

**GEN2** Is there anything else you would like to tell us in response to this consultation?

Planning Policy  
East Hampshire District Council  
16 January 2023

**Response of CPRE Hampshire, the Countryside Charity, to Regulation 18 Part 1 Consultation on East Hampshire Local Plan 2021-2040 (excluding the South Downs National Park (SDNP))**

CPRE Hampshire, the Countryside Charity, welcomes the opportunity to contribute to this consultation, which we do by way of this letter as the Consultation Survey is not suitable for the detail of our Response.

It is said that we do not need to resubmit comments made before. Accordingly, we draw attention to our detailed letters of Response of 18 March 2019 and 14 October 2019 to the consultations on Review of the Local Plan and Large Development Sites. This Response updates those Responses as regards the topics covered by this new consultation and is the outcome of discussion amongst the members of our East Hampshire District Planning Group.

In the main, the objectives expressed in the consultation document have our support, but there are significant areas of contention which are highlighted as follows:

- the consultation is premature in respect of housing numbers and distribution in view of the letter of 5 December 2022 from DLUHC to all MPs ("the DHULC Letter") indicating a move to "advisory" housing targets and allowing departures for exceptional circumstances
- in any event the housing numbers in the consultation document are unnecessarily high as they are based on out of date household projections and an affordability ratio which is distorting housing need
- there should be a reduction in housing numbers to take account of the area occupied by designated sites of international and national importance for biodiversity
- there needs to be more emphasis on providing smaller and more affordable homes and social rented accommodation
- it is unclear how Valued Landscapes will be identified and protected
- there is no protection for areas of tranquillity, or ecosystem services
- protection of the natural environment from large scale solar farms is needed
- the current settlement hierarchy does not accurately record the facilities and services as they exist
- we propose a new Option 5 as regards spatial distribution



Supporting arguments are to be found in the text below

## **OVERVIEW**

OV1 Please rank these key issues and priorities in order of importance to you  
Climate Emergency / Population and Housing / Types of Housing Needs / Environment /  
Infrastructure. See below

We are unsure why the question asks consultees to rank in order of importance as all the Topics are vital to a Sound local Plan. If pressed for a choice, and having regard to the particular interests of CPRE in protecting the countryside, we would have to prioritise Environment.

## **VISION**

VIS1 How do you feel about this vision? Happy / Satisfied / Unsure / Dissatisfied / Unhappy?  
Unhappy

VIS2 Does the vision cover the key matters of importance that the Local Plan can influence and inform? No

VIS2a If no, please tell us what is missing from the vision and why this is important

The current Local Plan recognises and protects the high quality landscape and natural environment of the local plan area and this is reflected in the later Environment Topic. This needs to be made clear in the 2040 Vision and in our view the reference to "green and welcoming places to live, work and play" does not achieve this.

Nor is there any reference to the need for development to be sustainably located.

We suggest the addition of the words in italics

"..... with green and welcoming places to live, work and play and respond positively to the climate emergency *within an environment in which natural beauty and wildlife is protected and new development is sustainably located*"

VIS3 Should the vision be more specific about areas of the District being planned for through the Local Plan? No

VIS3a Please explain your answer.

The overarching 2040 Vision should apply to the local plan area as a whole. Routes to achievement within a particular part of the local plan area could be set out in a specific Objective or Policy where clearly justified by different circumstances, but in our view the whole local plan area is sufficiently similar to make this unnecessary.

### **THE CLIMATE EMERGENCY**

CPRE Hampshire commends the Council for its vision in placing climate change in the forefront of the emerging Local Plan, and we strongly support policies to move towards carbon neutrality.

Our previous Responses to consultations have predated the Climate Emergency, and the expansion of applications for large solar farms on greenfield sites is an area of concern for the new Local Plan which, therefore, it is appropriate to cover in this Response. We do so within the Environment Topic.

**CLIM1 Do you agree that the new development should avoid any net increase in greenhouse gas emissions, wherever practicable** Yes

**CLIM2 Please rank the statements in order of importance to you.**

- That the construction of new buildings should use less fossil fuels and more recycling of materials
- That every new development should have renewable energy provision and that any wind or solar development must be in-keeping with the locality and its surroundings
- That climate change policy should clearly identify the impacts on water availability, with water consumption being reduced in new developments, including by reusing it on site
- That trees and other green infrastructure could play an important role in reducing flood risks

We are unsure why the question asks consultees to rank in order of importance, as all the considerations are important to responding to the climate emergency.

Trees are undervalued because they not only help with flood risk but provide shade, sequester carbon, enrich biodiversity and enhance the well being of residents.

**CLIM 3 Do you agree that the Council should define 'net-zero carbon development' in this way?** Yes

**CLIM 3a If you answered 'no', how should the definition be improved?** N/A

CLIM4 In the future, should the Council's policies on the design of new buildings focus more strongly on tackling climate change in accordance with the energy hierarchy? Yes

CLIM4a If you answered 'no', how should we balance the design of new buildings with the need to tackle climate change? N/A

CPRE is supportive of following in new development the Energy Hierarchy set out, and urges the Council to adopt LETI energy standard for residential homes.

We note the UK Warehouse Association has identified the warehousing sector has the roof space for up to 15GW of new solar power and has the potential to "deliver the entire UK requirement for 2030 forecast by the National Grid future energy scenarios (FES)." We also note the French government has now mandated that all *existing and new* car parks with space for at least 80 vehicles must now be covered by solar panels.

So, we consider that all new non-residential building should include the 'maximum amount' of roof-mounted PV, and we would urge the Authority to consider the opportunity to retro-fit solar onto existing commercial rooftops, and to consider the use of existing open spaces, such as car parks, before any greenfield sites are developed. This would allow the Council to lead on climate change without detracting from its countryside, which plays a vital role in natural carbon reduction. Many buildings can be sensitively repurposed or reused, rather than replaced.

CLIM5 Should the detailed criteria for tackling climate change be specified:

- In the emerging East Hampshire Local Plan Yes
- In future Neighbourhood Plans Yes
- In local design codes Yes

CLIM 5a Please can you explain your answer

We believe that, to meet the goals set out in the 2040 Vision, it will be essential for the Council to define a clear set of deliverables

CLIM6 How do you feel about the idea of living locally to influence the locations of new homes?

Happy

CLIM6a Please explain your response.



The principle of living locally to facilities is fundamental to the principle of sustainable new development, which is strongly supported by CPRE. It underpins the need to develop on brownfield sites in urban areas where facilities already exist.

## **POPULATION AND HOUSING**

### **Housing Numbers**

**POP1 How do you think we should proceed:**

- Use the standard method for calculating housing need as the basis for determining the requirements against which the five-year housing land supply and Housing Delivery Test are measured No
- Further explore whether exceptional circumstances exist to be able to devise a revised local housing requirement Yes

**POP1a Please explain your answer** See below

**POP2 Are there any strong reasons not to use the housing need figure of 517 new homes per year for the local plan?** Yes

**Please explain your answers** See below

The change from mandatory to advisory housing targets, as set out in the DLUHC letter means that this Consultation is effectively out of date as regards housing numbers as the official numbers will become only the starting point. It seems that departures from this starting point will be permitted at Examination if to take account of factors such as local constraints, the character of the local plan area and concerns of the local community.

It remains to be seen how these reforms will be implemented through the Levelling Up Bill and changes to the NPPF. We consider it would be appropriate for East Hampshire not to progress this Plan further until the new principles on housing numbers are clarified, and can be incorporated into a draft Local Plan for further Regulation 18 public consultation.

The current housing requirement for each local authority is based on out-dated information, i.e. the 2014 household projections - a view shared by many in the planning world. The 2021 census data is highlighting the shortcomings of the projections, particularly in respect of the authorities in urban south Hampshire.



The change to advisory housing targets may well bring a move to using up to date household projections (as otherwise many authorities would no doubt seek to justify departures to reflect up to date projections). In that event we would expect the Council to re-base the number of homes in the Plan on up to date projections and soundly based local needs assessment. This may lead to a justified departure from the figures based on the standard methodology.

If numbers of homes beyond real local needs are planned for, as in the past, towns and villages would face unnecessary development on greenfield sites which would further damage character and distinctiveness by encroaching on countryside settings; and which would rely on the private car for most journeys due to the lack of public transport. This would work against the Council's meeting its climate change objectives.

Further, the continued provision of more housing puts yet more strain on our already diminishing water resources and quality.

While the announced changes envisage a removal of the need to maintain a rolling 5 year housing land supply, the detail is unclear and it appears to remain in place at present. Recently, the council has faced difficulties in maintaining a 5 year land supply and defending decisions to refuse speculative applications for development. It is important that the situation is not exacerbated for the future by planning for more homes than necessary.

### Affordability Ratio

One reason for higher numbers has been the Affordability Ratio. This is a required element of the standard methodology. It is intended to improve affordability of market housing over time by reducing the cost of market housing relative to earnings. However, in East Hampshire there is compelling evidence of the opposite. Over the last 10 years, some settlements have seen increases in housing numbers of 25%, yet the price of housing has increased by a similar amount.

This is a function of an algorithm which requires that where the multiple of the median house price relative to the median salary increases, the number of houses that need to be built must also increase. This gives a perverse incentive for the development industry to build more houses above the median house price. So where new expensive houses will sell easily, as in East Hampshire (often to those moving into the local plan area), this has the opposite effect than planned and in practice does not make housing more affordable.

In the consultation document the Affordability Ratio is stated to be 166%. That is an additional 251 dwellings pa on top of the 381 calculated as the 'local' need. Across the period of the whole Plan, that equates to 3765 dwellings, but the HEDNA shows that the provision of these additional dwellings is not required to meet the needs of local people. As Table 6.6 demonstrates, the local needs as defined by 'natural change' have actually declined in recent years; so more than 100% of the increase in population has come from 'net internal migration'.

It follows that the high Affordability Ratio being used is materially distorting the understanding of housing need in East Hampshire. In the HEDNA a range of Affordability Ratios can be found – ranging from 9.8 to 14.51. This range represents a difference of up to 112 dwellings pa, or 1680 across the 15 years of the Plan. Yet the higher value of 14.51 has been selected despite the adverse consequences of using a higher Affordability Ratio, as outlined above. We consider that a lower Affordability Ratio can be justified in the circumstances of East Hampshire, which would lead to a lower housing number.

### Constraints

POP3 Based on the above should we meet:

- All the housing needs of East Hampshire's part of the SDNP No
- Some of the housing needs of East Hampshire's part of the SDNP No
- None of the housing needs of East Hampshire's part of the SDNP Yes

POP3a Please explain your answer. See below

We have for some years urged the Council to reduce housing numbers to take account of the fact that 57% of East Hampshire District is within the SDNP, and we have in meetings commended the terms of the letter of November 2021 from Cllr Millard to Michael Gove raising the inequity of applying to the rest of the District the numbers calculated by the standard methodology for the whole District. Now the SDNP would appear to be a "genuine constraint" for the purpose of the DLUHC Letter, so justifying a reduction in housing numbers for the rest of the District. We strongly support that approach, as indicated in the consultation document.

The approach is further justified by the fact that housing need targets do not apply to national parks and so the designated landscape is not threatened by housing development to meet more than locally established needs.

A further issue is that a significant part of the local plan area falls within sites designated as of international or national importance for biodiversity, and/or is Valued Landscape. We consider that these are also a "genuine constraint" which would justify a reduction in housing numbers.

### Conclusion on housing numbers

The Council will need to take advantage of the change to advisory housing targets and a likely move to using up to date household projections to adjust proposed housing numbers so as to meet established local needs. The Affordability Ratio needs to be challenged in the context of East Hampshire. The numbers also need to take more account of the high-quality character of the local plan area, and the reduced availability of land for development when constraints resulting from designated biodiversity sites and Valued Landscapes are taken into account.

### Unmet need of neighbouring authorities

POP4 At present we do not know the precise amount of unmet need but we are aware of our neighbours seeking help, therefore do we:

- Offer to assist with all unmet needs, regardless of scale and location; No
- Offer to assist with some unmet needs, where there may be a direct relationship with the communities of East Hampshire; Possibly, where would benefit residents of the southern parishes
- Do not offer to assist with any requests from our neighbours. Agree in principle POP4a

Please explain your reasons. See below

In the past the main neighbour with unmet need has been the PFSH authorities. As acknowledged, the amount of any unmet need from PFSH is not yet known. The move to advisory housing targets only increases the uncertainty, and the proposed removal of the Duty to Co-operate may colour the Councils approach to taking homes from the south Hampshire planning authorities.

In fact, the 2021 census data shows numbers of households in south Hampshire to be significantly less than projected in 2014, including Eastleigh, Fareham, Gosport, New Forest and both cities of Portsmouth and Southampton. The consequence is that demand for housing in the PFSH area should be much reduced which, along with a focus on brownfield sites within the urban area for reasons of carbon neutrality, means that any requirement to accommodate housing from PFSH should be unnecessary, and unjustified. Accordingly, no allowance for PFSH not meeting its own requirements should be made, but there may be a case for taking some houses if residents of the southern parishes would benefit thereby and brownfield sites can be found.

## **TYPES OF HOUSING NEEDS**

CPRE Hampshire supports the building of the appropriate type of housing to meet the needs of the district up to 2040. There is clearly an urgent need to provide new homes for key sections of the community in East Hampshire. There are 4 critical groups of people:

- The 65+ age group
- Young people who are struggling to get onto the housing ladder.
- All those who currently don't have accommodation or who live in wholly unsuitable accommodation.
- Key workers.

In terms of the implications for the Plan, the data indicates that the vast majority of all the new development planned should focus on these groups. We consider that there should be specific policies for each of these groups. But it is clear that there is one common theme – the need for smaller, lower cost accommodation.

### Older persons

#### **HOU1 What should a specific policy on older persons accommodation include?**

- A specific target in terms of numbers of homes for older persons accommodation to be delivered within the plan period Yes
- Specific types of homes to be provided Yes
- The location of these homes across the District Yes

**HOU1a Please explain your reasons** See below

**HOU2 Is there anything else that should be included in this policy** See below

All the demographic trends reported in the HEDNA show that the population of East Hampshire will become significantly older. As Table 6.12 shows, 66% of the forecast growth in population in East Hampshire will come from the population of '65 and over'. This group is not homogeneous. As it represents such a large percentage of the forecast growth, it is important that policies are designed for each of the component parts

- The fit and healthy (who want to down-size)
- Those that wish to move to a community for senior citizens
- Care homes
- Nursing homes.



HOU3 Should the Local Plan include a specific policy on adaptable housing? Yes

HOU4 Should there be a requirement on large sites for a percentage of new homes to be adaptable? Yes 100%

HOU4a Please explain your reasons See below

It is difficult to see why all new homes are not constructed as adaptable as this will be cheaper and easier than retrofitting. The homes would then be available for all age groups, including older persons, who may then be able to stay in their own homes for longer.

#### House Sizes and Mix

HOU5 Should the Local Plan include a policy to specify the percentage of smaller homes on development sites? Yes

HOU5a If yes, should this percentage focus on:

- 1-2 bed homes
  - 2-3 bed homes
- (select one option)

1-2 bed homes

HOU6 Should a percentage of smaller homes to be provided on:

- All development sites or
- Only large development sites (over 10 units) (select one option)

All development sites

HOU6a Please explain your answer See below

Whilst there will be a lower rate of growth in population amongst the 16-65 cohort, it is clear that many young couples struggle to get onto the housing ladder. For this group the key issue is what can they afford based on their income. If we assume that a couple earn £60,000 pa and can get a mortgage of 4.5 times their salary, they can afford a property priced at £270,000. Policies should be put in place to deliver new houses at or below this price point.

Whilst the needs of older persons, those needing to get on to the housing ladder, and those needing affordable housing (see below) are different, there is a common theme. Each of these groups requires smaller, more affordable homes. The current situation is that the District has a significantly higher number of larger homes (3 or 4 bedrooms) than the regional profile (see HEDNA Table 2.6) and it is clear that there is little need for new larger homes. So, we consider that policies in the Local Plan need to that focus on

- 1-2 bedroom dwellings
- Terraced houses and flats (see HEDNA table 2.2 )
- Where there is a policy on offering a discount from the market rate, the discount brings the price/rent down to a genuinely affordable level ie £270,000 for ownership; 35% of earnings for rental.

**HOU7 The current requirement is that 40% of new homes on qualifying sites are affordable homes. Should the % requirement for affordable homes be:**

- Increased
  - Decreased
  - Stay the same
- (select one option)

Stay at least the same

**HOU8 Are there any other forms of housing that the Local Plan should refer to? Yes**

**HOU8a If yes, please state what other forms of housing** Social rented housing.

We consider that the debate about affordable housing should be re-framed. It should be based on the principle of what people can afford. In other words, it should start with an analysis of what people earn – rather than being based on a discount from the market price. This is essential to meet the needs of the key groups - young couples; keyworkers; those in poor quality housing. This is consistent with the CPRE briefing document (Redefining Affordability) which would define homes as "affordable" only if they consume 'no more than 35% of net household income for lowest quartile income groups in each local authority local plan area'.

Policies should be designed to differentiate between ownership and renting:

- i) Ownership: the policy should be based on what can be afforded in terms of a mortgage. The calculation above indicates a figure of £270,000.
- ii) Private Rented: there is a need in East Hampshire for more rented housing. The policy should be based on earnings

- iii) Social rented housing: there is an urgent need in East Hampshire for more social rented housing. It is important to address the housing needs of the people who already live in the district but suffer from inadequate housing. This is a major issue and should be the focus of a number of policy initiatives.

Accordingly, we strongly support the Council's new Affordable Housing Strategy designed to build more affordable homes for local people using financial contributions paid by developers in lieu of providing affordable housing on developments.

## **ENVIRONMENT**

Much of the text of the consultation document relates to matters of biodiversity in which CPRE Hampshire has only limited expertise. Having said that, we do consider the text does not emphasise sufficiently the need for the Council to meet its obligations to protect biodiversity as prescribed in legislation. Nor does it make clear that green infrastructure is not just areas set aside but for the connectivity of green spaces.

Beyond that, our comments are confined to landscape and related aspects of the natural environment

ENV1 Which of the below environmental consideration is most important to you? Please rank the below list in order of importance, from the most important to the least. Achieving improvements to local wildlife habitats;

Protecting the most vulnerable existing protected habitats and species;

Conserving the character of rural landscapes;

Creating better natural links between existing habitats.

We are unsure why the question asks consultees to rank in order of importance, as all the considerations are important to protecting the natural environment. If pressed for a choice, and having regard to the particular interests of CPRE in protecting the countryside, we would have to prioritise "conserving the character of rural landscapes", but landscapes have only limited value without wildlife.

In any event protection is required to be provided for all designated or protected habitats, not just the most vulnerable.

### Valued landscapes

We strongly support the reference to valued landscapes in the consultation text. This refers to an addendum to the Landscape Capacity Study 2018. This sets out an explanation of landscape value as it is currently understood and interpreted generally within the landscape profession and wider community, and goes on to describe how landscape value is expressed within the 2018 Landscape Capacity Study"

This is encouraging, but we are unclear how it relates to the need to "*protect and enhance valued landscapes (in a manner commensurate with their identified quality in the development plan)*" - 2021 NPPF paragraph 174(b). While the landscape value of areas of the District is established as part of the process of establishing Landscape Capacity, there is no discussion of which landscape values are considered to be as "valued landscapes" per NPPF; or how, exactly, the landscape values translate to the classifications of Landscape Capacity.

Clearly the higher the landscape value the lower the Landscape Capacity, but is it to be taken that all areas of landscape identified as low capacity (red) or medium/low capacity (orange) are thereby identified as "valued landscapes" per NPPF? If so, this needs to be said within a policy to protect Valued Landscapes in the new Plan.

It is also unclear how this encompasses the Landscape Value Statements for the Large Development Sites of July 2020, where several sites are considered to be "out of the ordinary" in landscape terms and are accordingly "valued landscapes" per NPPF.

Without clear identification of Valued Landscapes and a policy to protect them we consider the new Plan will be unsound as inconsistent with the NPPF.

### Tranquillity and Dark Skies

It is disappointing that there is no reference in the text to identifying and protecting tranquil areas per 2021 NPPF para 185 (b), or to protecting intrinsically dark night skies per 2021 NPPF para 185(c), as these are acknowledged to be important to well-being.

Without clear identification of tranquil areas and a policy to protect we consider the new Plan will be unsound as inconsistent with the NPPF. Similarly in the absence of policies to limit the impact of light pollution.



### Safeguarding views

Views are very much part of enjoyment of the landscape. Development needs to avoid significant impacts on important views or landmarks within the district. Landscape Character Assessment, Valued Landscape Assessments, Village Design Statements, Conservation Local plan area Character Appraisals, Conservation Local plan area Management Plans, Local Landscape Character Assessments, Parish Plans and Neighbourhood Development Plans may provide evidence on views and should inform development proposals.

The emerging Local Plan should have a policy for the protection of important views from public vantage points and rights of way.

### Setting of the South Downs National Park

Development within the setting of a national park can harm the enjoyment of the national park by the public making use of rights of way and viewpoints. This is now recognised in the NPPF by way of words added in 2021 to paragraph 176 on development within designated local plan areas. These require that development within the setting of the SDNP "*should be sensitively located and designed to avoid or minimise adverse impacts*" on the national park. The emerging Local Plan should have a policy to implement this requirement.

### Renewable and low carbon energy schemes

It is clear from recent experience with proposals for large solar farms that renewable energy schemes can cause significant harm to landscape and the natural environment. So, we have a concern that the new Local Plan may be too quick to adopt the easy approach of a significant expansion of greenfield solar generation. It is important for the Council to hold in balance its important role in protecting and enhancing the countryside, as a resource for all Residents, an asset for visitors and tourism, a vital part of the history and heritage of the District and as a key part of maximising carbon sequestration.

We recognise the rapid development of technology in this sphere, particularly in terms of lightweight PV films and glass, but are concerned that promoting the development of technology that may rapidly become redundant risks causing damage to the District's countryside for a short term gain. Redundant because an increasing proportion of UK energy is now sourced from offshore wind, and this will increase rapidly.

So, it is not necessary to sacrifice large tracts of valued and valuable landscape. We face a significant food crisis at the same time as climate crisis and it is vital for us to protect our productive land rather than unthinkingly cover it with solar development.

Greenfield solar may be beneficial for landowners and developers but there are significant costs to the community in terms of potential loss of heritage, landscape, amenity and tranquillity. There is also a loss in terms of the potential for land to mitigate climate change through natural sequestration. So, we would urge the Council to make clear that greenfield sites for utility scale solar will be the exception and not the rule, given the value of countryside for tourism, community, wildlife habitat, and carbon sequestration; and acknowledge the particular situation of the district in having limited available open space due to the SDNP and its setting. And that greenfield solar will never be acceptable on Best and Most Versatile Land (BMV) in acknowledgement of the food security crisis.

So, specific policies for solar farms in the new Local Plan will be needed if the Vision and Objectives for conservation and enhancement of the natural environment are not to be prejudiced by large scale solar farm expansion. We consider that proposals should only be permitted if they will cause "no significant harm to the landscape or visual amenity", individually or cumulatively. An LVIA should always be a requirement. The policy needs to recognise the impact of noise from such schemes on tranquillity, and to protect public rights of way. It needs to state that in any event they will not be permitted on the best and most versatile agricultural land.

We would encourage the Council to require all developers to provide a credible Full Life Cycle Carbon Budget so that the true, global, impact on climate change can be assessed against loss of landscape and land use. We are very concerned that utility scale solar will become an industrial blight on the landscape when panels become redundant and there will be little prospect of restoration to previous productive land use without a financial incentive on the landowner. 'Restoration plans' not backed up with financial penalties are inadequate. We strongly urge the Council to adopt the policy of other Authorities to require a legally enforceable Decommissioning Bond to ensure the land is returned to its original condition with ultimate responsibility on the landowner at time of decommissioning.

We understand the developing need for energy storage to 'smooth out' the demand for electricity, but, owing to their industrial nature, we do not consider battery storage facilities to be suitable for greenfield in all but exceptional circumstances. They should be treated as industrial infrastructure inappropriate for a rural location. In any event there need to be policies to protect tranquillity as battery storage facilities can be a significant source of noise.

## **INFRASTRUCTURE**

**INF1 What type of infrastructure is most important to you?**

**Transport / Health / Education / Water / Energy etc?** This must be a matter for local residents

Infrastructure only gets 4 pages (out of 71) despite the acknowledgment that "*we rely on infrastructure to support our daily lives*" and that "*it is vital when planning.....that full account is taken of the infrastructure needed to deliver sustainable growth.....*" This is in part because EHDC through CIL and S106 only provides a small part of the infrastructure development. For example, EHDC has only dispensed £4.3m in CIL funds over the past 6 years – mainly for community/sports needs.

However, through the planning process EHDC can influence the important third party provision of necessary infrastructure, which needs to benefit existing as well as new residents/employers. It is acknowledged that residents feel that existing infrastructure is under pressure and new homes would just add to this tension.

**INF2 How happy are you about the allocation of EHDC CIL funds to date.** These are relatively small sums of money (approx £700k pa across the district) in the context of infrastructure needs. This should be a matter for local residents

**INF3 Which of these do you think provides the best outcome for infrastructures provision?**

**Many small sites dispersed across the district / Medium sized sites / Large Sites / A Mix of these A Mix**

While Large Sites would deliver the "greatest provision of infrastructure locally", this will be largely absorbed by the development itself and offer little to existing communities, whereas a Mix of sites would provide more infrastructure benefit to the local plan area as a whole. Long term sustainability of any new development should remain amongst the most important of key site criteria

Appropriate investment in infrastructure will need to be required as part of the planning process dependent on the scale and needs of any development. The proposed Infrastructure Plan will need to reflect this.

## **DEVELOPMENT STRATEGY AND SPATIAL DISTRIBUTION**

### **Consultation question**

DEV1 Please rank these options in order of preference?

- Option 1: Disperse new development to a wider range of settlements
- Option 2: Concentrate new development in the largest settlements
- Option 3: Distribute new development by population
- Option 4: Concentrate development in a new settlement

None of the above. We prefer a new Option 5 as discussed below

DEV2 Why have you ranked the options in this way? See below

The consultation document sets out the four Options and asks for these to be ranked in order of preference, but we consider there are flaws in each of the options as discussed below. Since we have not felt any option to be suitable or appropriate, we are not able to rank them. We propose a hybrid version (an Option 5, see below) based on sustainable development principles and which minimises adverse impact on the climate.

Option 1 – We support settlements of all sizes having development to meet their own needs, but would not favour expanding development to some of the smaller villages as they do not have the facilities, and development beyond their own needs would simply increase use of the car and so be unsustainable.

We support in principle the concept of 20-minute neighbourhoods so far as this improves sustainability within communities and reduces use of the car. The concept might be usefully applied in the some larger towns with significant existing facilities but even then, with current patterns of travel to work across the District and the location of large supermarkets and secondary schools, we do not see how 20 minute neighbourhoods could realistically encompass all employment, retail and educational needs in any location.

Further, the current settlement hierarchy is based on the evidence provided in Appendix D. We believe that this data is unreliable as:

- i) the scoring system distorts the data (eg it suggests that Four Marks has the same number of "convenience" stores as Alton)
- ii) some of the data is factually incorrect. We have identified more than a dozen errors (eg it shows there is no place of worship in Bramshott, Kingsley or Bentworth)

This tends to illustrate the problem that a settlement hierarchy based on facilities is always a snapshot in time and so not a good way of allocating development over a Plan Period lasting to 2040. A revised settlement hierarchy based on potential accessibility to local services and facilities by walking and cycling suffers from the same defect.

Accordingly we do not favour Option 1

Option 2 – This option appears to be the most sustainable, and elements of it appear in our Option 5 below. However, we suspect that the intention would be for development of greenfield sites on the outskirts of the settlement and so promote car use and will rarely be consistent with a 20-minute neighbourhood.

Accordingly we do not favour Option 2

Option 3 -It is hard to evaluate this option without having the data on the demography and population of the component parts of the district. As with a settlement hierarchy, population numbers are also a snapshot in time. The settlements with more facilities are likely also to have the greater population and it is difficult to see how far this Option would in practice differ from Option 1.

Accordingly we do not favour Option 3

Option 4 - We see this is the most unsustainable, carbon intensive, suggested Option for the less than 4000, 1-2 bedroom homes needed over the Plan Period. Having regard to the high quality natural environment of the local plan area, we do not see how a large-scale greenfield site could be found of sufficient size to create a new self sustaining community, whether as a large urban extension or otherwise. This would probably require at least 5000 homes. New development local plan areas at Waterlooville and Whitely demonstrate that these are an intensely car dependent way of accommodating new housing, and so inappropriate in the context of a climate emergency.

Accordingly we do not favour Option 4

**DEV3 Are there any alternative options we should consider? Yes**

**DEV3a If yes, please explain See below**

New Option 5 - CPREH believes there is an alternative approach, which starts with Brownfield First and then moves on using a sequential approach designed to meet the requirement for new homes. We have termed this Option 5, which would accord well with the greater emphasis on brownfield development and small sites set out in the DLUHC Letter.

Firstly, build out existing permissions

Then in sequence:

- Increased densities in existing allocations
- identify opportunities for smaller homes to meet demographics trends
- Windfall allowance, small sites & large sites (more than 5 dwellings)
- Brownfield sites. The Brownfield Register identifies sites for 366 dwellings, which is start. Yet the sites included in the register are constrained by the requirements set out in the legislation. We are confident that an Urban Opportunities Study and a renewed call for additional Brownfield sites would reveal more suitable sites.
- Under-utilised land and buildings, eg Class E permitted development rights and changing role of High Streets
- Urban regeneration - is there an opportunity to revisit the balance of retail and housing in the larger settlements?
- Car parks - build over to leave car park as undercroft
- Re-allocation of land from other use to housing,
- Suburban densification, see Policy Exchange paper ideas. [Policy Exchange - Strong Suburbs](#)
- If there is still a requirement for allocations, then
  - Urban sites, small
  - Rural sites, small, to meet local need and avoiding both Valued Landscapes and the potential for gap erosion and settlement coalescence.

CPREH believes that such a sequential, hierarchical process will lead to the most sustainable pattern of development, with best outcomes for reducing CO2 emissions, and that the spatial and geographic analysis will then naturally follow.

In order to identify sites in many of these categories it is not sufficient to rely on sites put forward by developers through the LAA process. A proactive process is needed, similar in objective to urban capacity studies of the 1990s but a simpler, more broad-brush approach designed purely to identify opportunities in the above categories for further investigation. We have called this an Urban Opportunities Study. The public could be involved in coming forward with suggestions.

The above sequence of development is strongly supported by the quite extensive guidance in NPPF Chapter 11 on making effective use of land, in the context of sustainable development and minimising the use of greenfield sites. It says that strategic policies should set out a clear strategy for accommodating objectively assessed needs in a way that makes as much use as possible of previously developed or "brownfield" land. Specific routes to that aim which planning policies should pursue are set out. Planning policies should also pursue efficient use of land and optimising use of land through higher densities, where appropriate. An Urban Opportunities Study will assist in complying with these requirements.

Just as an example as to how car parks could be developed, we have used a website called Parkulator (<http://imactivate.com/parkulator/>) which attributes certain densities to surface car parks and analyses how many dwellings could replace them. This gives an indication of the art of the possible, and ground level parking can be maintained as an undercroft.

*CPRE Hampshire South Downs & Central Planning Group*

13<sup>th</sup> January 2023

## Comment on first issue of East Hampshire Local Plan 2020 - 2040

1. **Introduction.** I'm a Cycling UK local campaigner and also coordinate a group running cycle rides to encourage PO7/PO8 residents to return to cycling. Comments made, focus on the south of the district, that's part of the Portsmouth Conurbation.
2. **General comments**
  - Proposals for infrastructure improvements are focused on the small towns in the semi-rural north of the district. The 3 southern parishes are also taking a lot of development and have different needs but their needs for cycling & walking are ignored. Being on the edge of the conurbation offers opportunities as well as problems but the needs should be viewed appropriately. That requires cooperation between EHDC & authorities to the south.
  - **Objectives of the local plan** are not clear. They must be to ensure the document gives maximum benefit to all residents, not just one area or group. The East Hampshire Welfare and Wellbeing Strategy document 2020 – 2024” might be one starting point. It identifies some of the present strengths & weaknesses.
  - **Cycling facilities in Horndean, Clanfield & Rowlands Castle** are well below the level that they should be for settlement on the edge of a large built up area. Both north/ south and east/ west cycle routes are needed through the centre of Horndean. Currently most of both routes are not in a user friendly condition. NCN222 is the primary north / south cycle route through Clanfield & Horndean but is very poor with substantial sections without appropriate infrastructure. Significant improvements are needed to attract more users. The east / west route is not mentioned but to the east was improved of the A3 several years ago. Cycling to Horndean TC was part of a national Sustrans led initiative in the early 1990's. The school obtained good on site facilities but 30 years later at least half of the recommended routes are still not in place. I understand it's been agreed to fund some outstanding routes out of new developments.
  - **Children cycling:** If the numbers cycling is to increase considerably over the next few years improved planning is needed to encouraging children to cycle and enjoy cycle rides in safety. Safe spaces & routes need to be identified that are suitable for & can be used by children (& older people returning to cycling) to gain confidence & be able to safely cycle on the roads. Housing estate roads need to have 20mph limits & most parking limitations to make them more cycle friendly. At junctions where side roads cross shared pavements, shared pavement users need to have priority. These topics are significant & don't seem to have been addressed but without them cycling won't increase much. Most schools encourage children to cycle to school but cycling infrastructure to schools is often poor.
  - **Sub dividing Horndean Parish into small historic areas:** (i.e., separating out Catherington, Lovedean & Blendworth) in study reports misrepresents the social & economic situation across the district, implying that Horndean Parish is far smaller and less significant than it is. This is likely to reduce the parish's benefits from the plan. In practice Horndean & Clanfield are slowly merging into one large community & it's long been difficult to identify the boundary between Horndean & Cowplain.
  - **Common place** asks for the following topics to be rated in order importance:
    - Climate emergency
    - Infrastructure



- Environment
- Population and housing
- Types of housing need

- **The following order is suggested** but in practice they are all inter-dependent.
- **1<sup>st</sup> Health & well-being** (of all residents)
- **2<sup>nd</sup> Climate Change / Environment.**
- **3<sup>rd</sup> Infrastructure**
- **4<sup>th</sup> Population & housing / Types of housing needed.**
- The reasoning behind this selection is.
- **Climate change;** If the temperature rise is not rapidly slowed down, well before 2040, there will be few places to live. A wide range of urgent actions are needed.
- **Infrastructure:** Without good infrastructure walking & cycling away from busy roads, it will be difficult to get more people to walk & cycle & reduce pollution.
- **Environment:** For healthy lives pollution needs minimising, motor vehicle numbers & speeds need reducing & cyclists & pedestrians segregated from motor vehicles. Other sources of pollution need to be reduced and the natural environment needs far better protection. The local plan could influence these aspects.
- **Population & housing / Types of housing needed.** The way ahead is dependent on success with the other topics.

### 3. Green Infrastructure Strategy paper (Access Recreation & Transport section from page 33)

The following comments are made.

- **Para 4.47.** Includes the statement: "Horndean is within 1 km of Staunton Country Park, a 325 ha site which is open to the public for a fee. Adjacent to Staunton Country Park is Havant Thicket, a Forestry Commission site made up of a series of Sites of Importance for Nature Conservation (SINC). Havant Thicket is freely accessible to the public." This sort of comment could damage the credibility of the local plan. The part of Horndean within 1km is not accessible to the public. The B2149 from Horndean to Staunton CP is narrow with fast traffic and close passing of cyclists, consequently few cyclists now use it. I recently cycled to Staunton CP from central Horndean by the shortest reasonably safe route to cycle. The recorded return distance was 20 km. To give a reasonable indication of distances, the distance to the centre of the parish should be quoted. (A similar misleading comment is made regarding QECP's location relative to Clanfield.) **Note:** page 38 of the EHDC draft LCWIP Technical Paper dated 2020 shows a potential desire line for a new cycle route from Horndean to Havant Thicket. Portsmouth Water's reservoir plans include a proposed exit to accommodate this potential route.
- **Para 4.6.2. Public Rights of Way / Sustrans routes. The following corrections are needed.** **NCN22** connects Petersfield & points north with Buriton, QECP East entrance, Rowlands Castle, Havant & Portsmouth. **NCN222** starts at **NCN22** at Weston Lay-by south of Petersfield. It connects Petersfield, QECP main entrance, Clanfield/ Horndean/ Cowplain & Waterlooville to **NCN22** in Farlington.
- **The need for an east west cycle route through Horndean is not mentioned. The east section, the NCN link between NCN222 at Horndean War Memorial & NCN22 at Rowlands Castle Station was provided some years ago. It should be included in the plan.** It's an important part of the east west cycle link around the north of the Portsmouth Conurbation & should be included in the plan. It enables easy access to the South Coast Cycle Route to Chichester and links to Denmead, Fareham & further west. Hampshire Highways applied 40mph speed limits on the route outside 30mph zones and Sustrans signed the 4km route. The small changes made most motorists aware of cyclists, lowering traffic speeds and reducing close passing. It's not perfect and needs at least on road cycle route marking but is currently the most comfortable long section of

cycle route to cycle in East Hants south of QECP. To the west of the A3 most of it is not in a state to encourage cycling.

- **NCN222** follows the old A3 south to Waterlooville. It has gaps, in north Clanfield, in Horndean from Snell's Corner to Horndean War Memorial (with a risky section through the old brewery site) & between Five Heads Road & Causeway Junction. South of Causeway Junction it uses a mix of bus lanes that are generally reasonable & a shared pavement route that's narrow with frequent lane changes, obstructions from bus shelters and parked vehicles and lots of junctions to side roads and houses. It's slow & uncomfortable to cycle. Even so a lot of people cycle it, including children to & from Horndean TC. Havant BC have, on several occasion, raised concerns about safety at junctions. I agree with them.
- **Items that should be added to the issues list include: Horndean has a reasonable off road network of off road footpaths, bridleways & BOATs.** Almost all are in a dreadful state of repair with most being unusable, by a large proportion of residents, for walking or cycling for most of the year. Some BOAT's & bridleways are too muddy to cycle or walk almost all the year. Almost all are on clay surfaces that are slow to dry & some flood. **Bridleway BW 41** was part of a well-used east/west cycle/walking route north of the Portsmouth Conurbation until 2002 when the BW41's culvert collapsed. (According to Farlington Church Records the culvert was built in the 15<sup>th</sup> Century by Friars from Southwick as part of a safe route round the Forest of Bere.) Since 2002 BW41 has been impassable to cycling. Most of the cycle route to Horndean TC from the east end of BW41 has recently been rebuilt & modernised but BW41 in Horndean & Frogmore Lane, mainly in Havant, are outstanding. This situation limits resident's opportunities to stay in good health. It's also a significant cycling & walking route to Horndean TC with no bus services on the route between Lovedean/Wecock & Horndean. **About 10 years ago Horndean's walking to health group had to close** as they only had one suitable route mainly away from roads.

#### 4. Spatial Development Background paper Nov22 Jan 23

- **Page 7. Active travel.** Says: "Settlements that would be the main focus for growth (Alton, Whitehill & Bordon, Liphook) have good potential for accessing multiple services and facilities on foot or by bike within their central areas. New development could also support increases to walking and cycling as a transport mode in smaller settlements." This statement seems very questionable when considering the opportunities that could easily be made available by increasing cycling in the southern parishes & linking into the Conurbation with its network of cycle routes."

#### 5. Settlement Hierarchy. Background paper.

- This includes reference to the. EHDC Local Cycling & Walking Infrastructure Plan (LCWIP) that explains, "that of the 80% of journeys made by private/motorised vehicles, 45% and 19% of all journeys made are less than 10km and 2km. This is the equivalent of a 30-minute cycle ride and a 23-minute walk respectively." **Comment.**

This zone is generally appropriate to walking & cycling to school or to shops and possibly cycle commuting to work in small communities. It doesn't represent what occurs in larger communities or from the edge of large settlements such as Portsmouth Conurbation where distances cycled to work are often considerably greater. Single distances of 15 to 20 km are common. See HCC Cycling Strategy paper Sept 2015 page 7 indicates typical distances cycled including in South Hants. **Cycle infrastructure plans for the southern parishes needs to consider this.**

#### 6. Climate Change & sustainable construction supplementary planning document:

Page 38 Para 8.9. Bicycle parking & storage at home is addressed but secure covered cycle parking close to shops & workplaces, that keeps a bike safe dry & ready to cycle, didn't seem to be mentioned. Havant has several well designed covered & secure units have been installed & work in shopping centres. East Hants would benefit from them.

#### 7. EH Green Infrastructure Strategy May 2019

**(Page 33) Quantity of open space** It's noted that the Study identified an existing deficiency in natural and semi-natural open space in the North West Sub-Area and Southern Parishes. These deficiencies are likely to be exacerbated to a small extent by planned growth in these areas, notably around Alton, Four Marks, Clanfield, Horndean and Rowlands Castle, where the majority of site allocations are situated. **Comment:** The note is agreed regarding the 3 southern parishes but I couldn't find reference to specific sites in Horndean. **Note:** Horndean has 2 reasonable sized open spaces that are well used for walking in reasonably dry periods, Catherington Down & Catherington Lith. Neither have good all year off road walking accesses. There are small publicly accessible sites at Yoells Copse, Hazleton Common, Merchistoun Hall & two playing fields. Off road access to open spaces in Horndean need improving & more open space is needed.



A Cycling UK local Campaigner

In addition to individual responses to the EHDC Local Plan consultation Energy Alton submits the following response:

### **The Vision**

The vision in the local plan is not sufficiently challenging. If the target is for net zero new building by 2050 then the vision by 2040 must be more than responding positively. The vision must refer to substantial progress towards the target. We endorse the submission from PECAN:

The vision contains important elements but lacks the climate and nature ambition to support the “greenest ever” Local Plan. For example, it does not mention the nature crisis or the need to reduce greenhouse gas emissions, the words “respond positively to the climate emergency” suggest only a modest improvement, and the reference to quality homes and green places does not include low emission buildings.

It could be re-worded in a more ambitious and inspiring way. For example see the vision statement in the Cambridge City and South Cambridgeshire District Councils’ Local Plan:

“We want Greater Cambridge to be a place where a big decrease in our climate impacts comes with a big increase in the quality of everyday life for all our communities. New development must minimise carbon emissions and reliance on the private car; create thriving neighbourhoods with the variety of jobs and homes we need; increase nature, wildlife and green spaces; and safeguard our unique heritage and landscapes.”

### **Definition of net zero carbon development**

We recommend that the definition of net zero carbon development is tightened up to read ‘Remaining energy demand should be met onsite unless this is not technically feasible such as in small housing developments.’ Developers then would be required to produce on site energy provision or provide technical justification if they cannot achieve this goal.

### **Connection of this Plan to the Retrofitting challenge for existing housing stock**

Whereas retrofitting existing homes is outside the remit of the local plan it remains the fact that the vision to decarbonize our community depends not on the building of new homes but on dealing with the vastly larger quantity of existing homes – more than 50,000 including homes currently being built! All but a few of these homes need upgrading with energy efficiency measures to reduce their heat loss together with the installation of low carbon heating systems and renewable energy generation. Zero carbon homes must be the clear target - this plan needs to be open about the challenge and how other EHDC policies will be complementary to the local plan.

### **Housing Targets**

We do not agree with the proposed minimum local need for housing of 632 houses per year across East Hampshire for the same reasons expressed by PeCAN in their submission. We do not believe the argument that overbuilding 251 houses per year above the requirement for demographic changes will make a significant difference to affordability. There are alternative ways of influencing the pricing challenge as Pecan clearly argues that avoid speculative building, increased infrastructure and loss of green space.

Furthermore, there is no mention of the opportunity to use brownfields sites -this is an omission that must be rectified. Changes of use in our town centres and industrial and farming landscapes gives new opportunities to adapt buildings for residential use. Environmentally this should be an automatic first step to meeting housing needs before new building is considered or permitted.

### **Location of Housing Developments**

We oppose the option of spreading housing development across a wider range of settlements. Already East Hampshire has higher transport carbon emissions than the average because of our rural nature. This approach will add to the problem. House building opportunities should be encouraged where district heating systems are viable and there should be an assumption that community renewable energy sites will be required for every existing or new community. We recommend that the definition of net zero carbon development is tightened up to read 'Remaining energy demand should be met onsite unless this is not technically feasible such as in small housing developments.' Developers then would be required to produce on site energy provision or provide technical justification if they cannot achieve this goal.

Energy Alton  
January 2023

# RESPONSE TO EHDC PUBLIC CONSULTATION ON THE EMERGING LOCAL PLAN.

Provided by:  
**Fight4FourMarks**

15th January 2023



This document is submitted by 'Fight4FourMarks' as part of the East Hampshire District Council's (EHDC) on-line Public Consultation regarding the Local Plan. In addition to EHDC provided data we have used numerous sources of public data to provide our analysis and recommendations.





## **About Fight4Four Marks (F4FM)**

We are a group of residents of Four Marks concerned about the historical overdevelopment of Four Marks, and the spectre of Large Development Sites once again being proposed for our villages.

Our aim is to focus on the education and awareness of residents about the Local Plan process and to provide an independent forum for residents who are concerned about inappropriate development that fails to respond to the existing community, its infrastructure, settlement boundaries and rural setting.

We have set up a web site [www.fight4fourmarks.co.uk](http://www.fight4fourmarks.co.uk) as part of our activities to increase the awareness of the residents of four marks about the Local Planning process and its impact on them. The first of our campaign leaflets is attached as a pdf file.

We are most willing to engage with EHDC (and Four Marks Parish Council) throughout this process.

Please contact Fight4FourMarks via the email address [REDACTED]



## Structure of this response

We have focused this response on the most critical sections of the Consultation, with the following summary of points:

1. Pausing the Local Plan process until the major changes in the proposed revisions to the National Planning Policy Framework, that have a major impact on the EHDC Local Plan, have become Law and the implications digested.
2. The need to recalculate the number of dwellings actually required, utilizing the flexibility in the proposed Bill.
  - a. Reduction in the number of new dwellings to be built: recognizing 57% of EHDC lies within the national park; only building the houses need to serve our demographic and reflecting the impact of Affordability.
  - b. Not building or avoiding building on productive farmland.
3. Stopping the manipulation of the infrastructure measurement.
  - a. Stop and Review Changes to the Settlement Hierarchy Policy (SHP) for Four Marks and Medstead .
  - b. Stop the arbitrary deviations from the '20 Minute Neighborhood'.
4. Adopting a 5<sup>th</sup> Development Option:
  - a. Create a new vibrant Garden Village of say 2,000+ dwellings, located near a main line railway station and trunk road, which has the supporting infrastructure built in advance / simultaneously with the development itself. It must not be crudely 'bolted-on' to an existing village, causing a compromised environment for existing and new residents.
  - b. If required, supplement this new village with additional small development (less than 50 dwellings each) spread throughout the district.
5. Improving the consultation process:
  - a. The incredibly low response rate – typically between 100 - 250 responses to a major section (as at last day of the Consultation) from a population of 89,752 (source HEDNA May 2022) gives a response rate of approx. 0.3%. This does not make it a sound basis for decision making.
6. The Local Plan process should then recommence, with the changes clearly set out in the EHDC documentation, and be accompanied by a much higher public awareness campaign.

Each of these six steps is expanded upon in the rest of this document. Where possible we have made reference to the EHDC consultation questions presented in *Italics*.





## Step 1: Pause Local Plan process – Major Changes are Imminent.

The Statement by Rt Hon Michael Gove MP on 9<sup>th</sup> December introduced many changes to the Levelling Up and Regeneration Bill which have a **direct impact** on Development in the EHDC / Four Marks and Medstead villages. These changes are expected to be made Law in the coming weeks.

We have outlined below some of the key changes and summarised what they mean to the residents of Four Marks and Meadstead so you can see the enormous impact.

**We believe EHDC need to fully incorporate these changes into the Local Plan process.**

Revisions to the Bill (in plain English)	Relevance to Four Marks Residents
<p><b>Abolish Mandatory House building targets imposed by Central Government</b> – now to be an advisory starting point, a guide. Local authorities, working with their communities will determine how many homes can be built, taking into account what should be protected in each area—be that Green Belt or national parks, the character of an area, or heritage assets.</p> <p>Local Authorities will not be expected to build developments at densities that would be wholly out of character.</p>	<p>No mandatory targets, targets are up to EHDC. 57% of land is in a protected National Park, squeezing EHDC Quota into less than half the land is unfair and fewer houses need to be planned for.</p> <p>The EHDC quota must be reduced in proportion to the area available.</p> <p>Four Marks and Medstead are villages, with a rural character which must now be taken into account</p>
<p><b>Protect Farmland</b> - further protection for our important agricultural land for food production, making it harder for developers to build on it.</p>	<p>Previously some sites for 650+ homes, were to be built on productive Farmland.</p> <p>Don't accept arguments about 'wrong type of farmland'. Fields around Four Marks produce food for our Nation; much of the land is designated as "Subgrade 3a: Good Quality Agricultural Land"</p>
<p><b>Local people have greater say</b>.... ..the Planning Inspectorate will no longer be able to override sensible local decision making, which is sensitive to and reflects local constraints and concerns.</p>	<p>These 'sensible local decisions' are strengthened by feedback from residents and help the Council to justify why they should not have their decisions overturned by the inspectorate.</p>
<p><b>Ends obligation for rolling five-year supply of land for housing</b> to be identified by the Local Authority</p>	<p>Eliminates the cumbersome and highly restrictive need to identify a 5 year Land Supply for building.</p>
<p><b>Credit for historic overbuilding</b>...Areas that have overdelivered on housing can reduce the number of houses they need to plan for in a new Local Plan.</p>	<p>As part of East Hants District, Four Marks has historically absorbed an unfair proportion of the district's housing numbers, we must have a reduction in our previous target.</p>
<p><b>Prevent Land-Banking</b>...Bill to ensure developers build out the developments for which they already have planning.</p>	<p>One major site in the south of our District has not built out causing additional pressures on the remaining parts of the county.</p>
<p><b>Use Brownfield first</b>...set lower rates on brownfield over greenfield to increase the potential for brownfield development.</p>	<p>Increase use of Brownfield sites to protect greenfield, especially productive Farmland.</p>

## **STEP 2: The need to recalculate the number of dwellings actually required - Only Build the houses actually Required.**

*(EHDC question POP1: How do you think we should proceed /Explain your answer)*

F4FM strongly supports the EHDC option of 'Further explore whether exceptional circumstances exist to be able to devise a revised local housing requirement. We have combined our answer with POP2 response as they are interconnected.

*EHDC question POP2: Are there any strong reasons not to use the housing need figure of 517 new homes per year in the Local Plan /POP2a Explain your answer)*

F4FM believes that the changes being enacted by Michael Gove through the National Planning Policy Framework process gives EHDC the flexibility to build only the number /type of house we actually need to serve our demographic. The targets can be reduced in various ways:

Reduction method 1: Revisit the use of 2014-based household projections (Reduce 'Overbuild').

We believe it's possible to interpret published Government/EHDC data to show that the predicted new housing demand from population change within the Local Plan area is 319.

The balance is sometimes thought be a tool to contain house price growth.

However, the overbuild is less than a 1% increase (we believe nearer to 0.5%) in housing stock in East Hampshire; the published OBR guidance indicates any house price reduction would be limited to the same value. This will have a negligible impact on affordability for first time buyers. Critically the recent drops in house prices caused by the cost of living crisis and higher interest rates, dwarf any overbuilding effect (probably by a factor of 15 to 20).

We propose EHDC should clarify any overbuild values and remove them from the target

Reduction method 2: Affordability Index impact (median workplace-based affordability ratio).

Looking at Affordability Ratio / Uplift impacts can also reduce the number of dwellings required. We believe the data used contained anomalies due to the timescales and data points used (ie after the pandemic resulted in high house price inflation), whereas now house prices are falling and significant pay rises likely in response to high inflation, it may overstate the affordability in the next decade.

We believe this would generate a most likely housing need of between 460 and 490 new homes per year.

Reduction method 3: Relax Impact of National Park Restrictions



F4FM calculates that using the flexibility under the new Regulations to take into account the special circumstances of the district regarding the impact of the National Park, will reduce the number of new dwellings EHDC should feel obliged to build in the Local Plan area.

Given that the National Park covers 57% of the district (low build rate, typically 20% of the Local Plan area) and that the remainder of the District is forced to carry an excessive burden, then using EHDC figures it is possible to unwind the extra burden and generate a figure of between 305 and 320 new build per year for the Local Plan area.

To support this view, we have included an extract from the Alton Herald 23<sup>rd</sup> June 2022

### **We need Gove to see sense on new housing**

By Richard Millard – Leader East Hants District Council

We have made our case to Michael Gove, secretary of state for housing and communities, but he remains stubbornly insensitive to the unique position we in East Hampshire find ourselves.

Gove's minions calculate how many houses should be built each year in East Hampshire and set EHDC a target – it increased by about 1,000 new homes in March.

What his number crunchers see is a large spacious district with lots of room for new homes.

But more than half the district, 57 per cent, is in the South Downs National Park which is protected from almost all development.

The South Downs National Park Authority (SDNPA) decides how many houses are built in the national park. And they have decided it won't be many. Currently it plans about 100 new houses each year, a tiny fraction of East Hampshire's total target. The SDNPA is like an umbrella covering over half the district.

But it's not right that, because of a line on a map, one East Hampshire village is sheltered from new homes while its neighbour is left in the deluge.

The full article is provided in Attachment 1

In addition to the above three methods:

- We have just become aware that, using 2011 and 2021 Census data and the governments tables on dwelling stock there may already be a surplus of dwellings over housing stock in East Hampshire. We ask EHDC to investigate this fully.
- EHDC should also be able to take into account the excess home building in the Four Marks village and further reduce the target for this area.

Umet needs.

*EHDC question POP4:* we believe the most appropriate response is 'Do not offer to assist with any requests from our neighbours'.



*EHDC question POP4a: Please explain your response.* All this section is focused on explaining why we suffer from over development and to add to that pressure by accepting demand from neighbours is not supporting the needs of the EHDC residents.

Getting the number of dwellings correct is very important as it is widely recognised that the construction industry is a major source of pollution and greenhouse gasses. Surely building unnecessary homes will harm the environment in so many ways.

We believe considering all six factors above the actual number of new dwellings per year for the Local Plan area should be between 300 and 320

### **Step 3: Stop and Review Changes to the Settlement Hierarchy Policy (SHP) for Four Marks and Medstead and the arbitrary deviations from the '20 Minute Neighbourhood'.**

#### **Plan to increase Four Marks from a 'Level 3' to a 'Level2' settlement:**

This policy states that the more infrastructure a location (settlement) has then the more sustainable it is considered to be and hence the more new housing it can accommodate.

EHDC are trying to reclassify Four Marks / Medstead as level 2 'able to take more development', from its established Level 3, defined as follows 'Small Local Service Centres have a more limited range of services but are suitable locations to accommodate some new development.....Modest development to meet local needs for housing, employment, community service and infrastructure will secure their continuing vitality and ensure thriving communities'.

Due to there being no material change or improvement (apart from the loss of the only public house and the addition of a convenience store), there is no Justification for changing the level. F4FM would like to see a realistic and true assessment take place, especially considering the flawed a comparison between Alton and Four Marks.

We understand from several sources that the comparison was as follows:

- Alton 32 points
- Four Marks 17 points

This means according to EHDC that Four Marks has about half the infrastructure /amenities of Alton. This is clearly wrong. It is based on awarding the same number of points regardless of if a settlement has two or five supermarkets. Consider a more realistic evaluation of just some of the important infrastructure / amenities as set out in the following table:

Facilities	Alton Number	Four Marks Number
Mainline Railway station	1	0
Library	1	0
Supermarkets	5	0
Dentists	5	1 (private only)
Pharmacy	many	1
Hospital (cottage)	1	0
Banks	3	0
Major Sports Centre	1	0
Public House	19	0

F4FM and others strongly argue that Four Marks / Medstead must remain a tier 3 settlement, with limited additional development, commensurate with not only its existing infrastructure but also the practicalities that would have to be overcome (in terms of land acquisition and physical space at the settlement's centre) to expand viable facilities in the future.

### **20 Minute Neighbourhood.**

The arbitrary change in criteria is a classic case of moving the goal posts to suit EHDC numbers and not the needs or practical requirements of the residents who will live in these neighbourhoods.

Such an action could fuel the suspicion that EHDC want to shoehorn major sites into Four Marks/Meadstead.

Using the 20 minute neighborhood concept means some reasonable facilities (like a food shop) should be within a ten minute walk each way.

When this is applied to Four Marks it does not enable much development to be allowed- we are already lacking infrastructure for the population we have today. Indeed, Four Marks already does not meet the "20 minute neighbourhood" criteria. How could that be met if nothing materially changes within the infrastructure?

So, it looks as if EHDC are trying to move the goal posts to prepare the village for unprecedented expansion, even though no infrastructure changes have been made.

Consider the following thought process:

- Four Marks does not have enough infrastructure to justify Tier 2 status, so...
- Increase the 400m walking distance to 800m --- still not enough infrastructure to support much new building.
- Increase the 800m to 1,200m – still not enough.
- Now ignore the significant changes in elevation in the walk – still not enough.



- Now Ignore the fact that residents must walk on footpaths and consider only the straight-line distance (through people's gardens etc) is taken into account - clearly ridiculous.

In effect moving from a 20 minute concept to a "30-minute neighbourhood" concept. This is a bending of the rules, but one which has a strong material impact on every resident- but still is insufficient.

F4FM also believes that EHDC have failed to take into account the age demographics of the Four Marks / Medstead areas and the higher than average age groups that reside in the area.

The 20-minute neighborhood concept was designed to be applied to Towns and Cities, not country villages.

The concept is best applied to settlements that have a centre and have experienced radial growth. The concept does not work well in a 'Ribbon Village' like Four Marks which has developed along the A31 and has a butchers and greengrocers half a mile from the post office and bakers.

(Please note: We invite the Councilors at EHDC and Four Marks Parish Council to undertake such a shopping trip. We will contact you to organize this activity. Please come prepared for a walk in inclement weather (snow, high winds, rain and ice are all in the forecast), up and down steep inclines and carrying 4 bags of shopping from Tesco. How do you wish to manage crossing resident's gardens? We will treat this as a formal experiment and have approached several bodies to act as independent observers).

We therefore reiterate, the classification of Four Marks to Tier 2 is simply wrong.

#### **Step 4: Develop a 5th Option 'Create a Vibrant NEW Garden Village'.**

**The F4FM response to EHDC Consultation section 'DEVELOPMENT OPTIONS' is:**

*EHDC question: DEV1 Please rank these options in order of preference*

All of these options have major shortfalls and we have developed a 5<sup>th</sup> Option

*EHDC question: DEV2 Why have you ranked the options this way?*

All of these options have major shortfalls and we have developed a 5<sup>th</sup> Option

*EHDC question: DEV3 Are there any alternative options we should consider?*

Yes

*EHDC question: DEV3a If yes, please explain:*

We believe that none of the proposed four Options offers the best approach. We propose that a fifth option should be chosen, as follows:

Create a NEW Garden Village of say, 2,000+ dwellings, but to be successful it should be built from 'first principles' and have the following attributes:

- Housing growth should be concentrated in a NEW settlement and not 'in a large urban expansion to one or more existing settlements.
- Located near a main line station, and a trunk road, a survey (conducted by SMASH in December 2022) show that 76% of people commute more than 20 miles and currently 82% travel by car; the right location is essential to avoid unsustainable commuting patterns.
- Holistically planned: new garden villages should be holistically planned, with a strategic framework (masterplan) which is comprehensive enough to guide investment but flexible enough to evolve over time.
- Built at a modest density, reflecting the need the area's ageing population.
- Built simultaneously with its supporting infrastructure (or built after the infrastructure is established). Generating infrastructure alongside the new housing, means new residents can feel integrated as they move in, and that they do not spill into neighbouring village infrastructure (e.g. schools, doctors etc.) and cause overcrowding.
- A single coordinated construction (albeit involving multiple builders) to a masterplan that can attract central government support
- Can be built at scale and over time, adhering to the Council's climate change and environmental protection policies
- Can incorporate the right transport infrastructure to minimize emissions.
- Provision for a vibrant social life: new garden villages should be characterised by their social and cultural vibrancy. This calls for a clear and long-term artistic and cultural strategy and a flexible approach to design and delivery, to accommodate changing needs – not bolted on to existing poor facilities with lip service paid by developers
- Designed to provide affordable homes close to employment. Homes should be located a short distance from a range of employment opportunities and local facilities.
- Delivering a successful new community requires a clear understanding of how assets generated by the development process will be managed in perpetuity.

As reflects real world experience this Option is not as simplistic as the four proposed Options.

In summary, the new garden village should **not** be crudely 'bolted-on' to an existing village, causing a compromised environment for existing and new residents, but planned holistically and minimizing travel by close by employment and facilities.

We would also support supplementing this new village with multiple small development (less than 50 dwellings), thoughtfully integrated with existing communities, spread throughout the district.



## **Step 5: Improve the consultation process.**

(EHDC Section 'GENERAL FEEDBACK')

*EHDC Question: GEN1- How do you feel about this consultation*

UNHAPPY

*EHDC question: GEN2 Is there anything else you would like to tell us in response to this consultation?*

Yes, please see the following section

F4FM wants to express its major concern with the Consultation process. We are very concerned about seven different aspects and have set out our concerns and where appropriate our recommendations.

However, we do appreciate that EHDC has given the residents of the district the opportunity to be involved and to give our views.

### **0.3% Response Rate Makes This Process Invalid**

The amazingly low response rate, typically 50 to 250 responses per major section, from a population of 89,750 – as per HEDNA 2022 – gives a response rate of under 0.3%. For such a vitally important activity to determine what type of housing / settlements do we need over the next 15 years this low response rate, as every statistician will tell you, is not a valid sample size and will produce unsafe results. As the words on the EHDC web page say 'We can't do it without you' – but EHDC are trying to do it without 99.7% of the people.

### **Simplify and focus on a few key issues**

The sections focused on 'Green Aspects' can be shortened. We *expect* our leaders at EHDC to take account of Climate Change and build dwellings that are as sustainable as possible in their construction and use. EHDC don't need to ask our views on this.

### **EHDC Silence on Michael Gove Changes to Legislation.**

The consultation was open whilst fundamental changes were announced by Rt Hon Michael Gove that would have a major impact on many aspects of the consultation process. We were amazed that EHDC did not set -out the changes in an update to the process. We are concerned that every response is now already out-of-date.

### **Far Too Complex – It's a Barrier to Public Participation.**

When EHDC undertook the dry runs of the website did it understand the time it would take typical residents to complete the response. We have been notified that many residents were taking three to four hours to read though, consider and provide a meaningful commentary. Others were intimidated by the complexity, jargon and the lack of 'user friendly' IT techniques. Others saw it as a way for EHDC to get what it always wanted by raising the bar so high people just gave up.





### **Keep it Simple and to the Point.**

Much simpler and more targeted questions would generate a much better response (thereby creating solid, actionable data and a higher response rate). Provide clear base case data ie how many new houses, how many new cars, impact on schools and medical centres, etc. A few very carefully crafted questions would also enable deeply held belief to shine through. A good example is the travel survey just undertaken by the SMASH group; a few questions, taking under five minutes to complete, that is providing amazing insight in to travel need of actual residents, all conducted at almost zero cost.

### **Too Few Consultation Sessions.**

F4FM and other groups felt there were not enough consultation sessions and that the level of detail available was insufficient, especially in relation to the enormity of the consultation subject.

### **Suspicious of a 'Pointless exercise'**

Within F4FM and other groups / individuals there was a shared suspicion that this consultation is a circular argument, so that EHDC can say that residents were consulted and then re-publish the original 10 Large Development Sites – re-ordered by political maneuverings (ie unfounded Settlement Hierarchy changes). With confidence in our Politicians and elected officials at rock bottom this would be a massive 'bone-of-contention'.

### **Much greater PR and Public Awareness**

Often, residents mentioned to F4FM that they were unaware of the Local Plan process, its importance, and the impact it could have on their daily lives. We ask EHDC to consider a much broader PR campaign.

### **Step 6: Re-start the consultation process.**

We propose that the consultation process should only be restarted once these considerations have been addressed.



## In Conclusion...

Through developing this response F4FM would like to make the following recommendations to EHDC:

1. The Local Plan process should be paused until the major changes of the Leveling Up and Regeneration Bill / NPPF that have a major impact on the Local Plan have become Law and the implications digested.
2. Recalculate the number of dwellings actually required, utilizing the flexibility in the Bill:
  - a. Reduction in the number of new dwellings to be built: recognizing 57% of EHDC lies within the national park; only building the houses need to serve our demographic and reflecting the impact of Affordability.
  - b. Not building on productive farmland.
3. Stop manipulating the infrastructure capabilities of Four Marks:
  - a. Stop and Review Changes to the Settlement Hierarchy Policy (SHP) for Four Marks and Medstead.
  - b. Stop the arbitrary deviations from the '20 Minute Neighborhood'.
4. Adopt a 5<sup>th</sup> Development Option:
  - a. Create a new vibrant Garden Village of say 2,000+ dwellings, located near a main line railway station and have the supporting infrastructure built in advance / simultaneously with the development itself. It must not be crudely 'bolted-on' to an existing village, causing a compromised environment for existing and new residents.
  - b. If required, supplement this new village with additional small development (less than 50 dwellings each) dispersed throughout the district.
5. Improve the consultation process:
  - a. The incredibly low response rate – typically between 100 - 250 responses to a major section (as at last day of consultation) from a population of 89,752 (source HEDNA May 2022) gives a response rate of approx. 0.3%. This does not make it a sound basis for decision making, further reinforcing the need to pause and start again on a different basis.
6. The Local Plan process should then recommence, with the changes clearly set out in the EHDC documentation and with a much higher public awareness campaign.

We hope that this document has provided some useful ideas and suggestions that will be incorporated into the Local Planning process. As mentioned in the introduction, all the members of Fight4FourMarks are enthusiastic about fully engaging with EHDC and Four Marks PC on this critically important activity.



## **Attchment-1 Alton Herald 23<sup>rd</sup> June 2022**

### **We need Gove to see sense on new housing**

By **Richard Millard** – Leader East Hants District Council

We need to think again how homes are delivered in East Hampshire, as for too long we have been wedged between a rock and a hard place – squeezed between the immovable object of Whitehall and the irresistible force of our local communities.

Ever-increasing housing targets are imposed on us from on high and its not sustainable. It's got to change.

We have made our case to Michael Gove, secretary of state for housing and communities, but he remains stubbornly insensitive to the unique position we in East Hampshire find ourselves.

Gove's minions calculate how many houses should be built each year in East Hampshire and set EHDC a target – it increased by about 1,000 new homes in March.

What his number crunchers see is a large spacious district with lots of room for new homes.

But more than half the district, 57 per cent, is in the South Downs National Park which is protected from almost all development.

The South Downs National Park Authority (SDNPA) decides how many houses are built in the national park. And they have decided it won't be many. Currently it plans about 100 new houses each year, a tiny fraction of East Hampshire's total target. The SDNPA is like an umbrella covering over half the district.

But it's not right that, because of a line on a map, one East Hampshire village is sheltered from new homes while its neighbour is left in the deluge.

It needs to change its current attitude to development and we will challenge them to take their fair share, otherwise the ever increasing number of homes must be distributed across the rest of the district.

But there are few areas that have the infrastructure and accessibility to absorb new developments and increased populations.

So it is the same names and the same places put forward over and over again.

Houses, especially affordable homes, must be built – nobody disagrees with that – but in the right places, to the right environmental standards and with the right infrastructure.

I said it has got to change – so we have stopped progressing our Local Plan and gone back to the consultation stage as so much has changed and a lot of the information is now redundant. We will go back to residents, communities and developers and begin our conversations again. Going back a step will also allow us to write in new environmental requirement to make the next Local Plan the greenest ever.



And we will challenge the government on their numbers and the methodology used to get there. Gove's Levelling Up Regeneration Bill proposes significant changes to the planning system That has led to uncertainty around national planning guidance and that needs to be fully understood. But it is clear he does not understand the impact of the proposals on East Hampshire or its residents or the special situation here.

It's my job to make damn sure he does.



# Only A Short Time To Get Your Views Included!

## Are you aware?

East Hampshire District Council (EHDC) have decided to re-boot the Local Plan, which covers development in our area until 2040, due to constant changes in Government Policy!

It is highly likely that **Four Marks** and **South Medstead** will again be under pressure to provide multiple Large Development Sites of **600+** houses!

Everyone understands the need for building new houses, but it must be **sustainable** and **balanced**. Over the past decade we have absorbed **600** new houses and welcomed new residents to the village. The existing **EHDC** Local Plan recognised the **over-contribution** already made by Four marks to the **District's housing targets**.

As an example: **1,200** new dwellings south of the **A31** will..

Add over **3,000** people to our village

Add **2,000** more cars, causing pollution and more delays

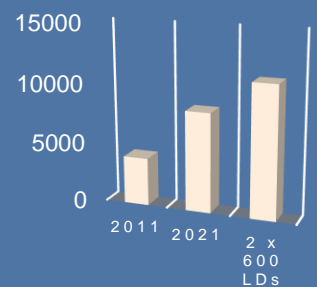
Add pressure to infrastructure already in deficit

Lose productive arable and pasture farmland

In the Local Plan, EHDC categorised our community as a 'Small Local Service Centre':

“Level 3 Small Local Service Centres have a more limited range of services but are suitable locations to accommodate some new development. .... **Modest development to meet local needs** for housing, employment, community services and infrastructure will secure their continuing vitality and ensure thriving communities.”

Major population growth but infrastructure remains static



Large Development Sites are **NOT** modest developments to meet local needs.... They are contrary to the council's own Spatial Strategy, The **Medstead and Four Marks Neighbourhood Plan**, the **EHDC Landscape Capacity Study 2018**, and the rural nature of our area.

[www.Fight4FourMarks.co.uk](http://www.Fight4FourMarks.co.uk)



The EHDC Local Plan process has re-started and can now accept input from residents.

**Not heard about it?**

**Please make your feelings known – and time is short....**

Event	Date
Start on-line consultation	21 <sup>st</sup> November 2022
Exhibition in Alton	7 <sup>th</sup> December 2022
Close of Consultation	16 <sup>th</sup> January 2023

**This is important**

This is the way we contribute to better considered planning. The council have recognised that in previous Local Plan consultations:

There was significant participation from the residents of Four Marks and Medstead

This input was influential

We can do this again by constructive contributions from our community

Typical of the major development issues up for debate.....

Is it sensible for planners to vastly increase the housing in small settlements with inadequate infrastructure?

Or, does it make more sense to create New Garden Villages, requiring the developers to provide suitable infrastructure in order to develop the site, ensuring a self-contained development and minimal disruption to the lives of existing residents by overloading already stretched resources.

**Get your voice heard by...**

Using the on-line consultation web	<a href="https://ehdcllocalplan.commonplace.is/">https://ehdcllocalplan.commonplace.is/</a>
E-mail (with attachment if needed) to	localplan@easthants.gov.uk
Writing a typed or handwritten letter to	Planning Policy, EHDC, Penns Place, Petersfield, GU31 4EX

As a result of this consultation a revised Local Plan will be issued that will identify the specific sites being considered for development.

**Four Marks felt like a village under siege...**

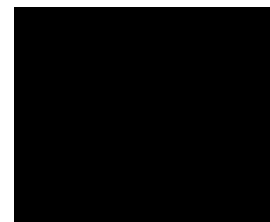
House of Commons Report 2014,

Since that report further large-scale building has taken place



[www.Fight4FourMarks.co.uk](http://www.Fight4FourMarks.co.uk)

## Medstead and Four Marks Neighbourhood Plan



Email: 

By email

12 January 2023

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

Dear Sir,

**Response of the Medstead & Four Marks Neighbourhood Plan Steering Group (NPSG) to the East Hampshire District Council's document entitled  
"ISSUES AND PRIORITIES REGULATION – PART 1"**

The NPSG welcome the opportunity to contribute to this consultation. As many of the issues raised are necessarily complex, we have chosen to respond by way of this letter in addition to completing the on-line survey.

In the main, we support the proposals in the "ISSUES AND PRIORITIES REGULATION – PART 1" document. In particular we support the emphasis and priority that the Council have given to policies to mitigate the impact of climate change and improve the quality of our local environment.

We also understand that EHDC are not reconsulting on many of the topics or sites previously considered in 2019 and that the information and opinions that were shared with EHDC at that time remain part of the preparation of this Local Plan and are not lost. We would ask that particular note is taken of the following three documents that we have previously submitted:

- i) The NPSG response to the EHDC Settlement Policy Boundary Review Draft Methodology – June 2017
- ii) The NPSG response to the EHDC Draft Local Plan consultation – March 2019.
- iii) The NPSG response to the EHDC consultation on the 10 Large Sites – October 2019.

However, there are a number of important issues raised by the "ISSUES AND PRIORITIES REGULATION – PART 1" document that we would like to comment on. These are as follows:

- i) The Quantum of Housing
- ii) The Affordability Ratio
- iii) The Four Options
- iv) Affordable Housing
- v) Settlement Hierarchy
- vi) Brownfield

## 1. THE QUANTUM OF HOUSING.

We are concerned that the target for new houses specified in the document does not reflect the real, current need of the district and has been set at an unnecessarily high level under the current Standard Calculation.

We believe that further consideration should be given to the following issues:

- i) The national park covers 57% of the district but currently takes a fraction (just one sixth) of the JCS Local Plan's allocated homes.

We fully support the statement made by the Leader of East Hants District Council when he said (in the article in the Alton Herald of 15 December 2022),

*"It has long been our opinion the government method to calculate housing figures is inadequate and unfair for areas like East Hampshire. This is especially when you consider our relationship with the South Downs National Park. The national park covers 57% of the district but takes a fraction of the allocated homes."*

- ii) The current housing requirement for each local authority is based on out-dated information – the 2014 household projections. Furthermore, those were based on the 2011 census. Now that the 2021 census data is available, we recommend that the future housing needs for the next 15 years should be based on the most up-to-date data.
- iii) This consultation is premature in view of the letter of 5 December 2022 from DLUHC to all MPs. The housing targets have always been the starting point for local plans and this letter indicated a move to "advisory" housing targets and allowing departures for exceptional circumstances. The change from in reality mandatory to advisory housing targets, as set out in the DLUHC letter, means that this consultation is effectively out of date as regards housing numbers as the official numbers will become only the starting point. It seems that departures from this starting point will be permitted at Examination if to take account of factors such as local constraints, the character of the local plan area and concerns of the local community.

We recommend that both the total numbers for the District and the split between the National Park and the LPA are reviewed and are the starting point before any strategic delivery options can be considered and decisions made. Therefore, EHDC should follow the example of other LPAs and wait for government clarification of changes to the NPPF and especially how the LDP 15 year housing target will be derived going forward.

## 2. THE AFFORDABILITY RATIO.

The Affordability Ratio is one of the key aspects of the Standard Method of calculating housing need that we believe to be 'unfair'. According to the HEDNA, the target for housing in East Hampshire needs to be increased by 66% over and above the projected need of the inhabitants of East Hampshire. We believe that that is an unjustifiable burden on the local residents.

We also believe that the fundamental rationale for the Affordability Ratio is flawed. The rationale put forward is that a significant increase in the supply of housing will lead to a material reduction in the price of housing, making housing more affordable to the many local residents who are currently priced out of the market.



We can find no evidence to support this thesis. In fact, the data suggests the opposite. According to the census data, over the last 10 years, the number of households in East Hampshire grew by over 11%. During this time, the number of households in Four Marks/South Medstead grew by over 25%. In neither area is there any evidence that this increase led to a reduction in house prices. Indeed, the data suggest the opposite. In the same period, house prices in the GU 34 area, have gone **up** by over 30%.

There are a number of reasons as to why the market may have responded in a way that is diametrically opposite from the one that was posited. We highlight two of them:

- i) The Affordability Ratio has a built in incentive for developers to build more expensive houses. The algorithm used means that the more houses that are built above the median house price the greater the number of houses that the LPA is required to get built.
- ii) These houses are attractive to those who want to move out of London. For those who have sold at London prices, this is an attractive opportunity to move to the countryside. This then prices local residents out of the market.

With regard to the detail of the calculation of the Affordability Ratio, we are also concerned about the data set that has been used to generate the figure of 14.51%. An analysis of the data included in the HEDNA suggests that

- Some of the trends implied by the data are unreliable
- The actual Affordability Ratio could be as low as 9.8%.

This is very significant, because a re-assessment of the Affordability Ratio could lead to a reduction of 112 dwellings pa or 1680 across the period of the Plan.

We recommend that the whole data set for the Affordability Ratio is subject to a rigorous review before any strategic options are considered.

### 3. AFFORDABLE HOUSING

We recommend that the debate about Affordable Housing should be re-framed. It should be based on the principle of what people can afford. In other words, it should start with an analysis of what people earn – rather than being based on a discount from the market price. We welcome the recent EHDC ambition and statements on real affordability, see [Bringing affordable homes to East Hampshire | East Hampshire District Council \(easthants.gov.uk\)](https://www.easthants.gov.uk/news/bringing-affordable-homes-to-east-hampshire) , rather than the governments national 20% discount off market price. This is essential to meet the needs of the key groups - young couples; keyworkers; those in poor quality housing; and the retired.

The proposed new approach would define homes as affordable:

- For owners: if homes were priced no more than 4.5 times the median earnings for a couple in the District
- For renters: if the rent was no more than 35% of net household income

Policies should be designed to differentiate between ownership and renting.

- i) Ownership: the policy should be based on what can be afforded in terms of a mortgage. The calculation above indicates a figure of less than £300,000.
- ii) Private Rented: there is a need in East Hampshire for more rented housing. The policy should be based on earnings
- iii) Social rented housing: there is an urgent need in East Hampshire for more social rented housing. It is important to address the housing needs of the people who

already live in the district but suffer from inadequate housing. This is a major issue and should be the focus of a number of policy initiatives.

#### 4. THE FOUR OPTIONS

The document entitled '*ISSUES AND PRIORITIES REGULATION – PART 1*' puts forward four different options for the distribution of new housing and asks the public to put them in the order of priority.

We do not believe that any of the options are the optimum approach for the distribution of new housing in East Hampshire, whatever the final 15 year Housing Market may be. Our recommendation is that at least one alternative option should be considered. This Option 5 would focus on the key demographic trends in East Hampshire which confirm the need for smaller, low cost accommodation.

#### **Option 5: Focus new development on providing smaller, low cost accommodation to meet the needs highlighted by the demographic trends**

There are important demographic trends forecast for East Hampshire (c.f. the HEDNA) which confirm the need for smaller, low cost accommodation. The main areas of need are:

- For the ageing population
- Young people trying to get on to the housing ladder
- Those with no or low quality housing
- Keyworkers on low wages

##### **a) The Ageing population**

This is the most significant trend identified in the HEDNA. As Table 6.12 shows, 66% of the forecast growth in population in East Hampshire will come from the population of '65 and over'

**Table 6.12 Population change 2021 to 2038 by broad age bands – East Hampshire (linked to delivery of 632 homes per annum)**

Age Group	2021	2038	Change in population	% change from 2021
Under 16	22,288	23,990	1,702	7.60%
16-64	72,234	77,059	4,825	6.70%
65 and over	29,956	42,990	13,034	43.50%
Total	124,478	144,038	19,560	15.70%

It is also noticeable that the forecast increase in the population of '65 and over' is 13,034. Assuming that the average members of these households will be 3 or less that indicates a need for 4344 homes. This suggests that most (if not all) the new housing in the Local Plan should be built for this group.

This group is not homogeneous. As it represents such a large percentage of the forecast growth, it is important that policies are designed for each of the component parts

- The fit and healthy (who want to down-size)
- Those that wish to move to a community for senior citizens
- Care homes
- Nursing homes.

### b) Young people trying to get on to the housing ladder

The HEDNA does not split out the increase in population for this group, but it is well known that there is a significant number of young people who cannot buy a home because they are generally far too expensive.

Many people in this category will be looking to buy a property at or below the maximum that they can secure for a mortgage based on median earnings. As discussed above this is likely to be under £300,000.

The HEDNA does highlight that some categories of market homes do meet these criteria. As can be seen from Table 2.2 below both flats and terraced houses are generally available at this more affordable level, and "in character" of this type should be encouraged.

**Table 2.2 Median House Prices, 2021**

	Detached	Semi	Terraced	Flat	All Sales
East Hampshire	£575,000	£376,750	£295,000	£207,500	£412,500
South East	£539,950	£359,950	£290,000	£210,000	£360,000
Differential	£35,050	£16,800	£5,000	-£2,500	£52,500
England	£385,000	£243,500	£215,000	£230,000	£274,000
Differential	£190,000	£133,250	£80,000	-£22,500	£138,500

Source: Icen Analysis of ONS Small Area House Price Statistics, Year Ending March 2021

### c) Those with no or low quality housing

The data shown in the Affordable Housing Strategy indicates that Hampshire Homes Register calculate that there is a need for 1 640 homes for people on their register. The data shows that over 80% of the need is for 1 or 2 bedroom accommodation.

The Council has identified over 600 parcels of land in its ownership. Most are small and unsuitable for development, however, some warrant further investigation into their development potential. As stated in the Strategy, the distribution of new housing in the Local Plan should be based on feasibility studies undertaken to establish which of these have the greatest potential for affordable housing development.

The Local Plan should also include policies for all relevant forms of tenure with particular emphasis on Social Rented Housing.

### d) Keyworkers

There are many keyworkers who live in the District who have difficulty in accessing affordable housing.

There is a real and urgent need to provide affordable opportunities to this group of people either to purchase, equity share, or rent at an affordable price.

**We therefore recommend that in reviewing the strategy for the distribution of new housing consideration be given to Option 5.** This would focus on delivering new housing to meet the critical needs of these groups who form the community's housing need, rather than a high margin demand for yet more commuter executive homes for those moving out of cities and large towns.

Whilst these are very disparate groups, they tend to have one thing in common – they have a need for smaller, lower cost accommodation.

We therefore recommend that the policies in the Local Plan on the distribution of housing should cover all nature of tenures (include Social Rent; Affordable Rent; Intermediate Rent; Shared Ownership; Shared equity and Rent to Buy) and focus on delivering dwellings that are

- 1-2 bedroom
- Terraced
- Flats
- At a price that someone on median earnings can secure a mortgage for.
- At a rent that is no more than 35% of their net earnings

In terms of the location of the new housing, these groups would clearly benefit from living in existing urban areas where they would have ready access to all the facilities that they will require to meet their everyday needs.

## **5. SETTLEMENT HIERARCHY/THE 20 min NEIGHBOURHOOD**

Option 1 (for the distribution of new housing) of the Issues and Priorities document recommends a new settlement hierarchy based on the concept of a 20 Minute Neighbourhood as described in the Settlement Hierarchy Background paper published by EHDC for the purposes of Local Plan Regulation 18 Consultation, November 2022 - January 2023.

We find the principle of a 20 Minute Neighbourhood appealing and it is currently a popular concept in the Planning trade press/websites and for a number of LPAs and communities. However, the focus of the 20 Minute Neighbourhood concept has been in larger, urban locations, not semi-rural villages the size of Four Marks/'South Medstead'.

Therefore, we do not believe that it would be practical in Four Marks/South Medstead for the following reasons:

- a) The Settlement Hierarchy paper acknowledges that the 20 Min Neighbourhood is impractical and extends the concept to a 30 Minute Neighbourhood.
- b) The paper acknowledges that Four Marks/ South Medstead is an 'anomaly' and does not even 'fit' a 30 Min Neighbourhood.
- c) The proposed 30-minute round trip is calculated on the basis of 'how the crow flies'. In FM/SM this does not reflect the physical layout and therefore real timescales.
- d) Most of the main daily activities (defined by the TCPA) do not take place within the settlement
- e) There is very little evidence that 20 Min Neighbourhood will be practical in a rural area.
- f) Any consideration of the most relevant distance must take into account the aging population
- g) Significant 'behaviour change' needs to be well established for this concept to succeed.
- h) There is a risk that the approach increases house prices.
- i) The data in Appendix D is only a snapshot in time.
- j) The data in the evidence base contains a significant number of factual errors
- k) The methodology used for Appendix D significantly distorts the key conclusions

Further details supporting these points are included in Appendix 1.

## 6. BROWNFIELD

Govt policy is to give priority to 'brownfield sites'. As the Minister of State for LUCH states in his Written Statement of 6 December

*"The new Infrastructure Levy will be set locally by local planning authorities. They will be able to set different Levy rates in different areas, for example lower rates on brownfield over greenfield to increase the potential for brownfield development. That will allow them to reflect national policy, which delivers our brownfield first pledge by giving substantial weight to the value of using brownfield land."*

We recommend that the distribution of new housing should start with a full and proper assessment of all the brownfield sites in the district, to update the existing incomplete Brownfield Register.

Yours faithfully,

[Redacted signature]

[Redacted name]

**Steering Group  
Medstead & Four Marks Neighbourhood Plan**

## THE SETTLEMENT HIERARCHY

The comments below relate to the Settlement Hierarchy Background paper published by EHDC for the purposes of Local Plan Regulation 18 Consultation, November 2022 - January 2023. That paper forms the basis for the new settlement hierarchy that is proposed in support of the recommendations in Option 1.

### i) The Principle

In the ISSUES AND PRIORITIES REGULATION – PART 1 21 November 2022 - 16 January 2023 document (I&P) it states (on Page 19) that

*“The Council’s declaration of a climate emergency puts renewed emphasis on reducing travel distances and increasing opportunities for walking and cycling as a means of transport. Whilst the increased use of electric vehicles will help to lower emissions, the truth is that there are still greenhouse gases associated with their use and production. The challenge of meeting net-zero emissions is also a challenge to walk and cycle more frequently to access local destinations.*

*For this reason, we have produced a new settlement hierarchy for the emerging Local Plan that emphasises accessibility on foot and by bike, to enable people to live more locally in the future. Further information on “living locally” is provided in the settlement hierarchy and climate change background papers, but in summary living locally picks up on some of the key ideas from “20-minute neighbourhoods”:*

The NPSG welcome the emphasis on addressing climate change and, in principle, support the concept of a '20 minute neighbourhood'.

As it states in the T CPA document, the benefits of the '20 minute neighbourhood' approach are multiple:

*“people become more active, improving their mental and physical health; traffic is reduced, and air quality improved; local shops and businesses thrive; and people see more of their neighbours, strengthening community bonds.”*

These are benefits that all communities would welcome.

However, the NPSG have some major reservations about the new settlement hierarchy that is based on the concept of the 20 min neighbourhood.

### ii) Implementation is impractical in Four Marks/South Medstead

The NPSG believe that a 20min neighbourhood would be impractical in Four Marks/South Medstead

- a) The paper acknowledges that the 20 min neighbourhood is impractical and extends the concept to a 30 minute neighbourhood.** The Settlement Hierarchy paper (at 3.3) states that:

*“Initially, a 20-minute neighbourhood area based on 800m distances – this being a 20-minute round trip on foot – was investigated, but this was found to exclude many residential areas within the larger settlements..... As such, a compromise position of using 1,200m distances to define a 20-minute neighbourhood has been applied.”*

There is no evidence base to support an approach based on 1,200m i.e., a 30 minute neighbourhood. This is confirmed by the Olsen paper referred to above:

*“There was little benefit in increasing the 10-min walking distance to 15-min for improving access to a range of facilities and amenities in rural areas”*

**b) The paper acknowledges that Four Marks/ South Medstead is an ‘anomaly’ and does not even ‘fit’ a 30 min neighbourhood.**

At 4.2 and 4.3 the paper highlights that Four Marks/South Medstead does not fit the template

*“application of the ‘20-minute neighbourhood area’ for Four Marks and South Medstead was unusual..... The Four Marks & South Medstead anomaly has the potential to skew the results by failing to adequately represent potential accessibility to services”*

**c) The 30 minute round trip is calculated on the basis of ‘how the crow flies’. In FM/SM this does not reflect the real timescales.**

Four Marks and South Medstead is a linear settlement along two miles of the A31, with a major barrier to mobility - the historic “Watercross” railway line crossed by single carriage-way vehicle bridges in two locations at either end of the settlement with dangerous narrow pedestrian walkways, and a pedestrian bridge at Medstead & Four Marks station.

We have carried out a project to assess the real time taken to walk between key points within the settlement and can confirm that very few of them can be completed within the proposed 30mn round trip.

**d) Most of the main daily activities (defined by the TCPA) cannot take place within a 20 min or 30 min neighbourhood.**

As the TCPA document makes clear, the concept will only work when the main daily activities are within the 20 minute range. They highlight “six essential social functions as crucial to sustaining a high quality of urban life: living, working, commerce, healthcare, education, and entertainment.”

This would only be possible in the Tier 1 settlements. For Four Marks/South Medstead most of these ‘main daily activities’ take place well outside the 30 min neighbourhood.

- Working: a recent survey shows that 75% of residents commute out of the settlement for their work
- Shopping: a recent survey shows that 58% of residents travel outside FM/SM for the shopping 1-3 days per week. One reason for this is that the cost of goods bought in Alton are significantly cheaper than those in Four Marks. A recent survey has confirmed that on a range of 8 branded grocery products a leading supermarket in Alton was over 10% cheaper than one of the major convenience stores in Four Marks. Additionally, the price petrol bought at supermarkets in Alton makes the trip attractive.
- Secondary schools: there are no secondary schools in Four Marks/South Medstead
- Primary schools: the primary school in Four Marks is on the extreme edge of the settlement. The primary school in Medstead is not in the settlement of Four Marks/South Medstead.
- Entertainment: There is no theatre, cinema or pub in Four Marks/South Medstead.

**e) There is very little evidence that 20 min Neighbourhood will be practical in a rural area.** (c.f. Nationwide equity assessment of the 20-min neighbourhood in the Scottish

context: A socio-spatial proximity analysis of residential locations (Jonathan R. Olsen, Lukar Thornton, Grant Tregonning, Richard Mitchell)<sup>1</sup>

**f) Any consideration of the most relevant distance must take into account the ageing population.**

As the HEDNA makes clear the main demographic trend over the next few years will be an increase in the 65+ age group. Any concept of accessibility on foot must take this into account.

**g) Significant 'behaviour change' needs to be well established for this concept to succeed.**

In the Town & Country Planning Association document, *20-Minute Neighbourhoods Guide Creating Healthier, Active, Prosperous Communities An Introduction for Council Planners in England*<sup>2</sup>, 2021<sup>2</sup>, and is aware of the barriers for developing successful 20MN, recorded in Section 7

The document identifies the key blockers associated with:

- Intra- and cross-organisational governance
- Planning and development policy and enforcement
- Making greenfield developments work within broader geographic scales
- Investment, funding, and budgetary constraints
- Resident/user perception and the need for behaviour change

This highlights to critical importance of behaviour change amongst local residents. Without this, the concept will fail.

**h) There is a risk that the approach increases house prices.**

The various studies that have been carried out into 20 neighbourhoods all point to the risk of them becoming too attractive. If the location becomes too popular, then the housing will become more expensive. With the Affordability Factor already high locally, this would not be a help to our communities.

**i) The data in Appendix D is only a snapshot in time.**

Many of the criteria on which the scoring in Appendix D is based change frequently over time. It is not a sound basis for a long term plan.

**j) The data in the evidence base contains a significant number of factual errors**

In the Settlement Hierarchy paper (at 4.1.) it says that

*"Table 2 (below) highlights the ranking of the settlements in accordance with the scores from Appendix D. These scores are based on the three-stage methodology that has been described in this background paper"*

There are too many errors contained in Appendix D for there to be any confidence in drawing conclusions from this data set. For example, it states that there are no churches in Headley or Lindford; and there is no dentist in Clanfield.

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<sup>1</sup> **Nationwide equity assessment of the 20-min neighbourhood in the Scottish context: A socio-spatial proximity analysis of residential locations (Jonathan R Olsen Lukar Thornton Grant Tregonning , Richard Mitchell)**  
<https://pubmed.ncbi.nlm.nih.gov/36368061/>

<sup>2</sup> **The Town & Country Planning Association: 20-Minute Neighbourhoods Guide Creating Healthier, Active, Prosperous Communities An Introduction for Council Planners in England**, 2021  
[https://tcpa.org.uk/wp-content/uploads/2021/11/final\\_20mnguide-compressed.pdf](https://tcpa.org.uk/wp-content/uploads/2021/11/final_20mnguide-compressed.pdf)



**k) The methodology used for Appendix D significantly distorts the key conclusions.**

The methodology used states that the maximum score for any settlement is 2. We believe that this approach distorts the data. For example, we believe it would give a more accurate comparison if the data was based on the actual number of a particular facility. The data presented in Appendix D suggests that Four Marks/ South Medstead has 59% of the facilities of Alton. However, if both settlements were measured on the basis of the actual number of facilities available, this would give a score of 233 vs 44 – or showing Four Marks/South Medstead having 17% of the facilities of Alton. We consider this to be a more accurate reflection of the size of the two settlements.



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## Online Submission of the Medstead and Four Marks Neighbourhood Plan Steering Group to the EHDC Draft Local Plan Regulation 18 - Part 1 Consultation. **DRAFT v2.1 @ 15.01.2023**

Our new Local Plan will ensure that we deliver the required housing, alongside the jobs, and supporting community infrastructure and services in a way that is appropriate for the rural nature and historic character of East Hampshire. We want the best quality homes to be built in the best places, to meet all the needs of our residents in the most sustainable way possible. We want our new Local Plan to be as proactive as possible in meeting the challenges of the climate emergency and to ensure any development is as sustainable as possible.

The new Local Plan will do this not only by setting out the distribution of new development across the district but also by setting out a number of policies to help guide the details of new development proposals.

### Background

In 2018, East Hampshire District Council (EHDC) began reviewing its Local Plan. This will provide a policy framework for planning and development for the areas of the district where the council is the Local Planning Authority (LPA).

For more than half of the district, the LPA is the South Downs National Park Authority (SDNPA). The SDNPA has therefore prepared a Local Plan that will cover the parts of the district that lie within its area. The [South Downs Local Plan](#) was adopted in 2019, however, in May 2022, the SDNPA agreed to review its Local Plan.





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## EAST HAMPSHIRE LOCAL PLAN 2021-2040

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There has already been extensive [evidence base gathering](#) to support the emerging Local Plan, as well as [two early-stage consultations](#) in 2019.

The intention was to proceed with the next stage of plan making – formal consultation on the pre-submission version of the Local Plan during 2022. However, it became evident that due to various factors and the potential impact these would have on the Local Plan, a decision was made to reset the preparation of the Local Plan in May 2022 and consider further early engagement on the matters that are important to East Hampshire.



### What is the purpose of this consultation?



We are seeking comments and information on the key issues and priorities that should be addressed in the new Local Plan.

This document does not include any preferred planning policies or proposals, we are simply asking a range of questions and identifying options on how the key issues should be addressed within East Hampshire over the course of the plan.

All feedback will help inform the next version of the Local Plan (Regulation 18 – Part 2) which will include the development strategy, allocate the sites to deliver the strategy and will also include policies to inform the location and type of development, and other matters such as the built and natural environment, infrastructure, design etc.



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**The Plan Period**

Government guidance requires the strategic policies in a Local Plan to look ahead over a minimum 15-year period.



The plan period for the new Local Plan has therefore been set as 2021 to 2040. The start has been revised to update parts of the evidence and undertake further early-stage consultation. It is anticipated that the new Local Plan will be adopted in 2025, therefore the end date will be 2040, to allow for the 15 years from adoption.

**NO COMMENTS**

We have set up a M&FMNPSG email address :





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**EXAMPLE OF HOW NUMBERS COUNT !**

Navigation menu: About the project | Timeline | Latest news | Have your say | FAQs | The team

### Overview contributions

262 comments | 1 agreement

about 4 hours ago

**OV1 Please sort these key issues in order of importance to you.**

1. Infrastructure
2. Population and Housing
3. Environment
4. Types of Housing Needs
5. Climate Emergency

[View proposal](#) → [Share](#) [Agree](#)

about 5 hours ago

**OV1 Please sort these key issues in order of importance to you.**

1. Climate Emergency
2. Environment
3. Infrastructure
4. Population and Housing

**This is how the feedback appears – it is a numbers game !**

**Not really sure what ‘agreement’ means – do you agree with your own or others ?**

## OVERVIEW

[Home](#) Overview

263 responses

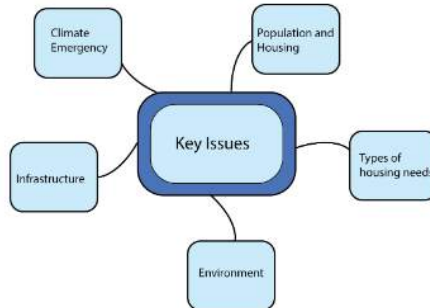
1/1

### Overview

A lot has changed since we last consulted on the Local Plan in 2019.

In 2019, you shared lots of information and opinions with us. That remains part of the preparation of this Local Plan and is not lost.

We are not reconsulting on many of the topics or sites previously considered – instead we are looking afresh at key issues and priorities that have been affected by changing context since 2019. For example, topics such as transport, employment and heritage were considered previously, and sufficient information has been gathered on these so they do not feature in this document.



**OV1 Please sort these key issues in order of importance to you.**

Sort in order of importance

Climate Emergency	0/10
Environment	0/10
Population and Housing	0/10
Types of Housing Needs	0/10
Infrastructure	0/10

Infrastructure	0/10
Types of Housing Needs	0/10
Population and Housing	0/10
Environment	0/10
Climate Emergency	0/10

The right hand side is proposed order but of course all five are important and inter-connected. My thinking was that infrastructure is the highest as without it any of the other four are impacted.

The NPSG response highlights that the wrong types of houses have been built so far.

Population (accurate estimate needed but stuck with what government decides) and Housing are core issue – target numbers. NPSG response highlights age profiles and multiple need cases.



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For some of those issues identified above, we want to delve deeper and see what is important to you and find out what should be included in our new Local Plan. This is particularly relevant for the Climate Emergency, which is a key concern for the Council.

Similarly, the Local Plan needs to try and accommodate our housing needs, so we are asking questions around housing numbers and the way it is calculated. We also want to know how we should be helping neighbouring authorities who have difficulties meeting their own needs.

It is not just about the housing numbers; it is about providing the right homes. We need to meet the needs of our ageing population, those with disabilities, those needing different size homes or varying types of housing. East Hampshire is extremely unaffordable, so affordable housing needs are extremely important, as are the needs of traveller communities and those wishing to build their own homes.

We will be presenting information and options on how we meet the above and asking for your views on the direction of travel the Local Plan should go in, in terms of location and policies.

Alongside the new Local Plan's key issues and priorities detailed above, protection and enhancement of the environment is enshrined in a number of legislative Acts and Regulations. These place a legal duty onto the LPA. The Council will continue to protect, enhance and conserve its environment and if you wish to seek further detail, please see the [Environment](#) section.

Any form of development needs infrastructure to help support it and it is fundamental in the delivery of sustainable growth. The new Local Plan will look at what new infrastructure is needed and what opportunities there are to help reduce gaps in existing provision. For more information, please see our [Infrastructure](#) section.



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## VISION

### Vision



To provide clarity on the type of place East Hampshire is anticipated to be, and what it will seek to achieve from development, the Local Plan should set out a vision. The vision should be ambitious, but achievable.

The purpose of the vision is to articulate how the Local Plan will direct and influence new development across the district over the plan period 2021-2040.

This version has been derived from the evidence to date and previous consultations on the Local Plan.

-----

**By 2040 our residents will live in healthy, accessible and inclusive communities, where quality homes, local facilities and employment opportunities provide our communities with green and welcoming places to live, work and play and respond positively to the climate emergency.**

-----

In order to meet the vision, clear strategic objectives will be needed to support any policies and allocations in future iterations of the Local Plan. For example, a previous draft version considered the theme of “A Front Door for Everyone” to be a necessary and achievable objective, in the context of providing sustainable levels of growth across the planning area.

**VIS1. How do you feel about this vision?**

Very happy   
  happy   
  neutral   
  Unhappy   
  Very unhappy

Very happy Very unhappy

---

**VIS2. Does the vision cover the key matters of importance that the Local Plan can influence and inform?**

Select one option

**VIS2a. If no, please tell us what is missing from the vision and why this is important.**

Tell us here

**VIS3. Should the vision be more specific about areas of the district being planned for through the Local Plan?**

Select one option

**VIS3a. Please explain your answer.**

Tell us here

---

What is your email address?

**Very Unhappy**

**No**

Quantum – a clear issue as it drives spatial strategy and delivery. Subject to government impending change. Reflect the constraints – age profile, dwelling types, tenures, and real affordability. Housing development needs to meet demographic and economic challenges identified in HEDNA - % of population over 65 but in different ‘needs’ groups, real affordability, tenure, and real sustainability.

Lack of infrastructure and mis-informed Settlement Hierarchy definitions is a massive constraint of top of 53% of EH in SDNP. Yes more area specificity is required – each area is different and has its own additional benefits and constraints.





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## EAST HAMPSHIRE LOCAL PLAN 2021-2040

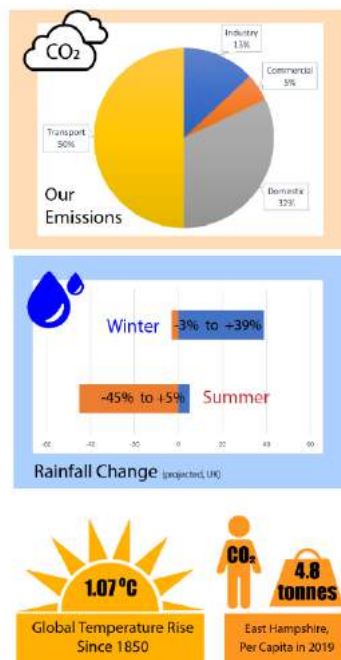
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### THE CLIMATE EMERGENCY

#### The Climate Emergency



Meeting global, national and local targets for dealing with climate change is one of the most important but challenging priorities for institutions and individuals. The planning system has a role to play in this, helping to deliver radical reductions in greenhouse gas emissions, supporting the use of renewable and low-carbon energy and taking account of long-term implications for flood risks, water supply, biodiversity and health. The climate change background paper identifies what a local plan can do and what must be left to other areas of public policy and intervention, such as retrofitting existing properties, which falls outside the remit of a local plan.





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Since previous consultations on the Local Plan, there has been a growing awareness that the transition to a zero-carbon lifestyle needs to happen as fast as possible. East Hampshire District Council declared a climate emergency in July 2019 and, in 2021, it announced an ambitious target to demand that all new homes built in accordance with the emerging Local Plan would be zero-carbon homes.

It will be very challenging to build zero-carbon homes during the local plan period – but the Council believes this objective must be pursued for the well-being of current and future generations.

National planning policy does not yet state how this should be done, so the Council is looking at best practice from elsewhere and taking expert advice from independent consultants. Your responses to this consultation can help the Council to make important decisions on tackling the climate emergency.

**CLIM1 Do you agree that new development should avoid any net increase in greenhouse gas emissions, wherever practicable?**

Select one option

**CLIM2 So far, you've told us the following - but what's most important to you?**

Sort in order of importance

- That the construction of new buildings should use less fossil fuels and more recycling of materials
- That all new buildings should be zero carbon
- That every new development should have renewable energy provision and that any wind or solar development must be in-keeping with the locality and its surroundings
- That climate change policy should clearly identify the impacts on water availability, with water consumption being reduced in new developments, including by reusing it on site
- That trees and other green infrastructure could play an important role in reducing flood risks

**Yes**

**Difficult to rank but I suggest :**

- That every new development should have renewable energy provision and that any wind or solar development must be in-keeping with the locality and its surroundings
- That climate change policy should clearly identify the impacts on water availability, with water consumption being reduced in new developments, including by reusing it on site
- That all new buildings should be zero carbon
- That the construction of new buildings should use less fossil fuels and more recycling of materials
- That trees and other green infrastructure could play an important role in reducing flood risks

**Rational is based on balance of impacts and achievability. I suspect others will put Trees and Green higher.**



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3/6

In response to the climate emergency and the desire to avoid new greenhouse gas emissions from development, the Council has been investigating a more ambitious approach to tackling climate change. As part of a 'Net Zero Carbon' study, independent consultants have been working with the Council to look at how net zero carbon buildings could be required through planning policies. In order to write these policy requirements, there needs to be a shared understanding of what we mean by 'net-zero carbon development'. Defining this phrase is a key issue for this consultation.

**Defining 'Net Zero Carbon Development' for the East Hampshire Local Plan**

A best-practice definition is considered to be one whereby:

- The energy consumed by a building's occupants is taken into account and reduced as far as possible. This would mean considering all of the energy consumed, not only that which is regulated by the Government's Building Regulations;
- The remaining energy demand is met with the equivalent amount of renewable power generation, either onsite or offsite;
- The remaining carbon dioxide emissions that are associated with a building (e.g. through making or obtaining its building materials) are estimated and reduced, wherever practicable.

**CLIM3 Do you agree that the Council should define 'net-zero carbon development' in this way?**

Select one option

Yes

No

**CLIM3a If you answered 'no', how should the definition be improved?**

Please be as specific as possible

✔ We've got your email: [REDACTED]

Yes, this is a realistic first step but should be revisited/reviewed at regular times during the life of the plan to 2040 to reflect national and local changes to zero carbon policies, expectations, and deliveries.

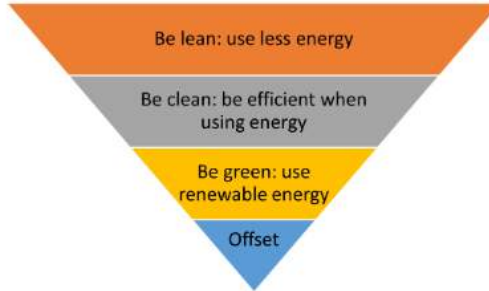
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## EAST HAMPSHIRE LOCAL PLAN 2021-2040

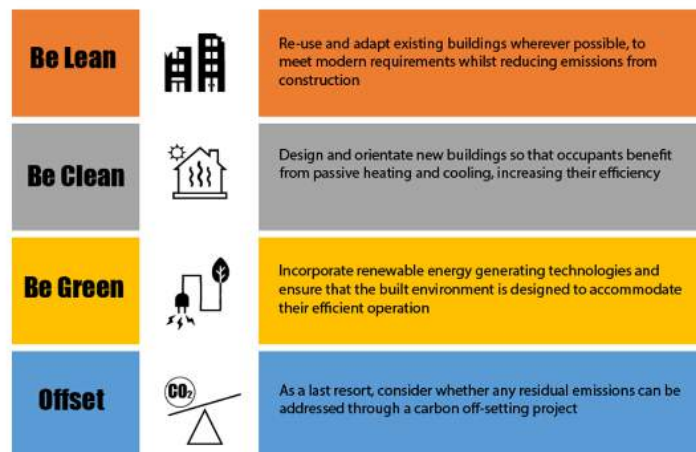
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### The Energy Hierarchy as an approach to mitigation

Tackling climate change will involve more than an approach to sustainable construction that identifies what is meant by net-zero carbon development. To help mitigate global climate change, the Council believes that the energy hierarchy should be followed whenever new development is proposed.



This energy hierarchy is an important part of the [Council's supplementary planning document on climate change and sustainable construction](#). This means that it already informs how the Council's current planning policies are being interpreted. For the emerging Local Plan, the energy hierarchy could be used to change the policies themselves, which could affect how new developments would look and how they would function. The following graphic identifies some of the potential implications for the planning of new development:



There will be a need to balance climate-responsive designs with other aspects of achieving well-designed places, as defined by the Government's National Design Guide. However, the Local Plan can help establish the priorities for the design and layout of new buildings through its design policies and one of these priorities could be climate-responsive designs.

**CLIM4 In the future, should the Council's policies on the design of new buildings focus more strongly on tackling climate change in accordance with the energy hierarchy?**

Select one option

**CLIM4a If you answered 'no', how should we balance the design of new buildings with the need to tackle climate change?**

Yes – these should be design **recommendations** or even **conditions** not just advice or guidance so that they are enforceable.

We've got your email [REDACTED]



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**Adapting to a changing climate**

The evidence is clear that the Earth’s climate is already changing in response to greenhouse gas emissions. New development will need to be resilient to these changes, which are likely to affect the amount of rain that we receive and the temperatures we are exposed to. Resilient environments that better protect people from the impacts of climate change can be created by following several overlapping design principles:



The climate change background paper describes some detailed approaches that implement these principles, such as providing more street trees and the use of sustainable drainage systems, but what is most important is that the measures that are used are appropriate to the context for development.

There are different ways in which the planning system can specify what should be done. For example, the Government’s National Model Design Code allows measurable requirements to be set through an area-specific design code rather than just relying on over-arching planning policies.

**CLIM5 Should the detailed criteria for tackling climate change be specified in any of the following?**

Select one or more options

In the emerging East Hampshire Local Plan

In future neighbourhood plans

In local design codes

**CLIM5a Please explain your answer**

All three – we need actions, not debate.





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### Emphasising accessibility on foot and by bike



The location of new development can affect our emissions of greenhouse gases, especially in rural areas, where people often need to travel to access services and facilities. In the past, the Council has defined a 'settlement hierarchy' and used this to influence decisions on where to put new homes and businesses. The hierarchy classifies settlements according to the presence and accessibility of services, so it can be a useful tool in helping to put development in places where there is less of a need to travel long distances.

The Council's declaration of a climate emergency puts renewed emphasis on reducing travel distances and increasing opportunities for walking and cycling as a means of transport. Whilst the increased use of electric vehicles will help to lower emissions, the truth is that there are still greenhouse gases associated with their use and production. The challenge of meeting net-zero emissions is also a challenge to walk and cycle more frequently to access local destinations.

For this reason, we have produced a new settlement hierarchy for the emerging Local Plan that emphasises accessibility on foot and by bike, to enable people to live more locally in the future. Further information on "living locally" is provided in the settlement hierarchy and climate change background papers, but in summary living locally picks up on some of the key ideas from "20-minute neighbourhoods":

*"The 20-minute neighbourhood is about creating attractive, interesting, safe, walkable environments in which people of all ages and levels of fitness are happy to travel actively for short distances from home to the destinations that they visit and the services they need to use day to day –shopping, school, community and healthcare facilities, places of work, green spaces, and more." (Town & Country Planning Association, March 2021)*

The Council recognises that walking and cycling distances in East Hampshire's towns and villages can be much greater than in larger towns and cities elsewhere. This is because the density of buildings within East Hampshire towns and villages is often quite low—and this is something that contributes to their character. The Council does not wish to change the attractiveness or "sense of place" of East Hampshire's settlements, so "living locally" should take account of the varying distances between services, facilities and homes.



**CLIM6 How do you feel about using the idea of living locally to influence the location of new homes?**

Very happy    Happy    Neutral    Unhappy    Very unhappy

Very happy    Very unhappy

**CLIM6a Please explain your response**

Tell us here

✔ We've got your email

Happy with the concept.

But Four Marks & Medstead struggles to see the reality and deliverability of such housing with either access to, or provision of, required / suitable / range of services. It has never happened before and in 15 years we have been changed to up to 50% a commuter car location. A 20 min or 30 min neighbourhood must be based on real journeys that account for barriers (railway/roads), actual routes not 'as crow flies' distances, and account for local hilly topography (as we will have 40% residents over 65)



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## ENVIRONMENT

### Environment



East Hampshire is a predominantly rural district and renowned for its attractive countryside. It has a wide diversity of landscapes, a wealth of wildlife habitats and has a number of large internationally, nationally and locally designated sites which protect rare species and habitats such as the Dartford Warbler, Bechstein bats along with its heathlands and grasslands. Part of the district also falls within the SDNP.

Since previous consultations on the Local Plan, we have seen a significant period of change both in legislation and policy relating to the environment. Its protection and enhancement are enshrined in a number of legislative Acts and Regulations which place a legal duty onto the LPA. The key priority for the Council therefore is to continue to protect, enhance and conserve its environment.

✔ We've got your email: [REDACTED]

[← Back](#)

[Next →](#)

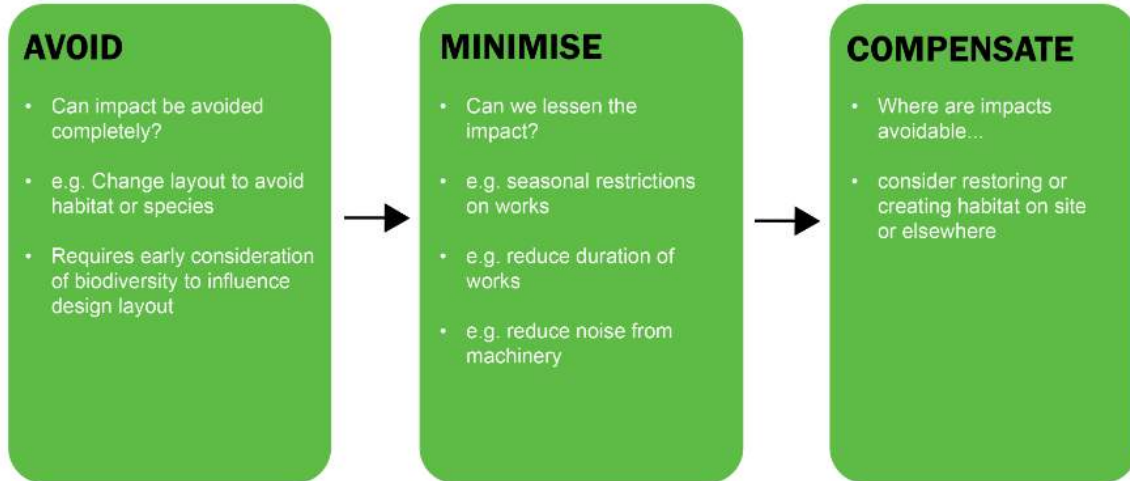
### What you've told us and what we're doing

A previous consultation on the emerging Local Plan included draft policies on a number of key issues which fall under the 'environment' heading. For example: protected sites, biodiversity, landscape and green infrastructure. You told us that:

- The draft planning policies relating to the international designated sites should provide further clarity with regards to the long-term management and maintenance of any agreed avoidance and mitigation measures to protect these sites.
- More emphasis should be given to the protection and enhancement of notable species and habitats.
- The concept of Biodiversity Net Gain should be strengthened, and consideration should be given as to whether there is a need for a bespoke standalone policy.
- Consideration should be given to the special qualities and sensitivities of the setting of the SDNP.
- Alongside the protection of the landscape, valued landscapes are just as important and require to be acknowledged.
- All Green Infrastructure areas should be resourced and managed to ensure successful long-term use.

The Council continues to protect, enhance and conserve its valued environmental assets and to aid this the Council has recently provided guidance [Biodiversity and Planning](#) (June 2021) to help aid developers, officers and the public on current legislation and policy relating to protected sites (International, National and Local), priority habitats, Biodiversity Net Gain and strategic measures for international sites. This guidance sets out the mitigation hierarchy which is a process used to inform development proposals. This document aids and helps address some of the issues raised under the previous local plan consultation.

**Mitigation Hierarchy**



As part of the emerging Local Plan, a Habitats Regulation Assessment (HRA) will be legally required. This assessment sets out whether there are any impacts on protected sites, and if so, how they will either be avoided or mitigated. The HRA will be accompanied by an Avoidance and Mitigation Strategy which will clearly set out the measures to address any impacts from future residential development within the catchment of the protected sites. As part of this consultation a [Habitats Regulations Assessment Screening](#) has been carried out. As the Local Plan progresses the Council will continue to work closely with Natural England on advising on mitigation measures.

The Council is also working closely alongside other local planning authorities to instigate the concept 'Biodiversity Net Gain', which is due to become mandatory in 2023. This is explained later.





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**Protected sites - International**



*Dartford Warbler (protected bird on the Wealden Heaths Phase II Special Protection Area)*

East Hampshire contains, and is adjacent to, several sites which are of international importance for biodiversity and designated under the Habitats and Birds Directives which form the top tier of the ecological network. These are:

- Special Areas of Conservation (SACs) notable for their protection to a variety of wildlife, animals, plants and habitats;
- Special Protection Areas (SPAs) notable for their rare bird species; and
- Ramsar sites which are wetlands of international importance.

The North East area of the district, around Whitehill & Bordon and Bramshott and Liphook, are within close proximity to the Wealden Heaths Phase II Special Protection Area (SPA). The Dartford Warbler is a protected bird on the Wealden Heaths Phase II SPA. The SPA is vulnerable from an increase in recreational activities resulting from new residential development which will affect the rare birds.

To avoid or mitigate any impacts from an increase in recreational activities from new development, one form of mitigation is Suitable Alternative Natural Greenspace (SANG). Hogmoor Inclosure in Whitehill & Bordon was set up as a SANG to allow new residents from the growth from the Whitehill & Bordon regeneration development. The SANG allows residents an alternative place to walk their dogs and recreate rather than using the existing SPA and is designed to gain the same experience from visiting the SPA.



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*Lowland heathland, Hogmoor Inclosure*

In the south of the district we have the Solent European sites. The water environment within this area is one of the most important for wildlife in the United Kingdom and is internationally important for its wildfowl and wading species, such as Brent Geese. There are existing high levels of nutrients (especially nitrogen and phosphorus) in the Solent which are causing harm and failure of environmental standards; this is partly due to an increase in new development from overnight accommodation.

The Solent European sites nitrogen issue affects the Southern Parishes of Clanfield, Horndean and Rowlands Castle. Whereby parts of Ropley, Medstead, Bentworth, Four Marks and Wield Parishes in the North West of the district are not only affected by nitrogen but also phosphorus.

The Council is working in collaboration with partner authorities including the Partnership for South Hampshire (PfSH) to work towards a definitive mitigation strategy to achieve what is called 'nutrient neutrality'. Nutrient Neutrality means that the finished development won't increase the amount of nutrients entering the Solent via sources such as sewage treatment works and septic tanks by providing some form of mitigation, for example in the form of a wetland.



*The Solent European site*



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#### **Biodiversity Net Gain**

Since previous consultations on the Local Plan there has been a growing awareness of Biodiversity Net Gain (BNG); which leaves biodiversity in a better state than before. BNG provides benefits to people and nature and reduces a development's impact on the wider environment. The mandatory minimum of 10% BNG is due to come into force in late 2023.

The transition period over the next year is key as is early consideration of BNG in our plans and projects and we are thinking about how BNG fits in with our emerging Local Plan. BNG can complement our wider biodiversity objectives, whether creating new green infrastructure or improving climate resilience, and can bridge the gap in the Nature Recovery Network through the development of sites and through off-site biodiversity net gains.

A previous consultation on the emerging Local Plan, BNG was seen as a key important concept which needed to be taken forward. For this reason, the Council has been working collaboratively with members of the Hampshire BNG Steering Group to define what BNG means for Hampshire as a whole and work together in instigating BNG in our plans and strategies.



*"BNG should seek to bolster the local ecological network by providing habitat that is relevant to the area and which will complement the existing habitat mix."*

Quote from the '[East Hampshire District Council Biodiversity and Planning Guidance](#)' June 2021.

#### **Landscape**

We are lucky to have a distinct and varied landscape which provides an attractive rural setting. It is important that the special qualities of our landscape are respected in planning for future growth.

Much of the district lies within the SDNP and part of the North Eastern boundary is adjacent to the Surrey Hills Area of Outstanding Natural Beauty (AONB).

It is important that any new development plays a key role in shaping the way the district looks and feels. Development must be designed and located to protect and enhance our valued and high-quality landscapes, particularly the setting, special qualities and sensitivities of the SDNP.

Since previous consultations on the Local Plan, valued landscapes are seen as a key driver which had previously not been considered. The Council has therefore carried out further work to support the [Landscape Capacity Study](#) by looking into valued landscapes. This work, now in the form of an addendum as part of the local plan evidence base, accompanies the [Landscape Capacity Study 2018](#).

As part of the emerging Local Plan, existing landscape features will be a priority in any decision making. Any proposed site allocations will need to be designed and located to ensure the continued protection and enhancement of our valued and high-quality landscapes is maintained.



*River Wey at Headley*

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**Green Infrastructure**

Green Infrastructure is a term used to describe the network of green spaces and the links between them. Elements of green infrastructure range from allotments to parks and gardens and from village greens to footpaths and rivers.



*An example of Green Infrastructure*

The Council recognises that green infrastructure can encourage inward investment, help to improve mental and physical health and wellbeing, enhance biodiversity and assist with climate change mitigation and adaptation. This is particularly beneficial following the council's recent Climate Emergency declaration in 2021.

Previous Local Plan consultations fully supported the concept of green infrastructure, and in the past the Council has produced three [Green Infrastructure evidence base documents](#). The most recent was published in 2019. These documents will help aid the evolving Nature Recovery Strategies as a result of the Environment Act 2021 and build on the existing established Local Environmental Networks.

**ENV1 Which of the below environmental considerations is most important to you?**

Sort in order of importance

Achieving improvements to local wildlife habitats	...
Protecting the most vulnerable existing protected habitats and species	...
Conserving the character of rural landscapes	...
Creating better natural links between existing habitats	...

✔ We've got your email: [REDACTED]

**For a massive area of concern and complexity, the EHDC planners reduce it to a simple four items ranked, with no opportunity to comment.**

All are equally important and deeply integrated together in urban, and especially our rural and semi-rural ecosystems..

Why only protect the most vulnerable - how is vulnerability defined ?

What is the definition of the 'character' of rural landscapes ?

Buffer zones and wildlife corridors are already part of the JCS LDP, often with conditions on approvals. Why do EHDC not enforce those conditions or even planning guidelines ?

What improvements to local wildlife habitats are suggested by EHDC ? Why have they allowed 15 years of estates building and 600+ dwellings increase on 2,100 dwellings in 2012



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## POPULATION & HOUSING

### Introduction

Increasing overall housing delivery is one of the Government's long standing key priorities for the planning system in England. Meeting future housing needs is therefore a central objective for all Local Plans, including ours.

The assessment of housing need we have carried out informs how many new homes will be required across the district. Our new Local Plan will set out how, through the planning system, we will seek to address that need.

A complicating factor is that East Hampshire district is split into four areas as a consequence of the SDNP. This means that there are in fact two LPAs operating in the district, East Hampshire and the SDNPA.

The East Hampshire Local Plan 2040 focuses only on those parts of the district outside of the SDNP. However, housing needs are calculated for the district as a whole. Therefore, one of the key issues for our Local Plan is to determine what provision, if any, we make for the housing needs of the SDNPA.

### What you've told us so far in terms of housing provision

We received a wide range of views when consulting on housing provision with responses from local communities, those in need of housing, and the development industry. There is general support for meeting the identified local housing needs and seeking to direct development to the most sustainable and accessible locations. However, views differ on the approach taken to assess local housing need, as well as meeting the unmet needs of neighbouring authorities. We have to balance these views to enable us to prepare a Local Plan that meets Government requirements, whilst taking account of local opinion.

### How is housing need calculated?

[National Planning Policy \(para 61\)](#) states that in order to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance (unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals).

Government guidance is also clear that the standard method for assessing local housing need is a minimum number and that "*consideration can still be given as to whether a higher level of need could realistically be delivered. This may help prevent authorities from having to undertake an early review of the relevant policies.*"

There is a strong emphasis to using the standard method and one of the benefits is that given this is based on national published data, then at the Local Plan examination stage the local housing need would not be challengeable.



*New housing in Alton*



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It is important to note that although the formula for calculating the housing need using the standard method is set in Government guidance, the data sets that lie behind the calculation are subject to change. At present a key part of the calculation is use of the 2014 based household projections. This is used to calculate household growth over the next ten years (2022-2032) and establishes a demographic baseline to be used within the calculations.

The other key component of the calculation is application of the median workplace-based affordability ratio – the latest published being for 2021 and this is updated annually and published in March. This is about applying an affordability uplift to the demographic baseline to take account of the relative affordability of housing in the district – so in simple terms the adjustment increases the housing need where house prices are high relative to workplace incomes.



Whilst complicated, the findings generate the following minimum local housing need for the whole of East Hampshire district:

<b>Household Growth (per year) over next 10 years, 2022-32</b>	<b>381 Homes</b>
<b>Median workplace-based affordability ratio, 2021</b>	<b>14.51</b>
<b>Minimum Local Housing Need (per year)</b>	<b>632</b>

Source: [HEDNA 2022](#) (Table 5.1)

As the standard method housing need can only be calculated for the whole district of East Hampshire and not just for the Local Plan area, East Hampshire is permitted by national planning guidance to calculate its own housing need figure using an alternative method.

However, planning guidance stresses that any other method should only be used in exceptional circumstances. It says “Where an alternative approach results in a lower housing need figure than that identified using the standard method, the strategic policy-making authority will need to demonstrate, using robust evidence, that the figure is based on realistic assumptions of demographic growth and that there are exceptional local circumstances that justify deviating from the standard method. This will be tested at examination”.

The Council therefore commissioned a piece of work to specifically explore this matter acknowledging the position with the SDNPA. That report ([Technical Note: Testing the Standard Method Housing Need for East Hampshire](#)) concludes that at a district level there is no evidence to suggest that data feeding into the Standard Method is substantially wrong.

The standard method affordability ratio is based on the median house price divided by the median income, with the most recent data being for 2021 giving an affordability ratio of 14.51.

Using a household growth projection split between the two areas and their associated affordability ratios (which differ to district-wide figures, due to geographies), gives the following breakdown of local housing need between the two areas.



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	LPA	National Park	Total
<b>Household Growth*</b>	<b>319</b>	<b>62</b>	<b>381</b>
<b>Affordability ratio</b>	<b>13.40</b>	<b>17.69</b>	
<b>Uplift</b>	<b>59%</b>	<b>86%</b>	
<b>Need</b>	<b>506</b>	<b>115</b>	<b>621</b>

\*Based on 2014 Household Population Projections  
Source: Derived from ONS data; EHDC Technical Note Fig 12

What is evident from the above is that there is no significant difference in the final district wide need number from the standard method calculations (632 vs 621).

On this basis, at this point in time there is no evidence to support moving to a lower or higher figure for housing need than is derived from the standard method.

**POP1 How do you think we should proceed?**

Select one option

Use the standard method for calculating housing need as the basis for determining the requirements against which the five-year housing land supply and Housing Delivery Test are measured

Further explore whether exceptional circumstances exist to be able to devise a revised local housing requirement

**POP1a Please explain your answer**

Tell us here

**Option 2**

The government has put changes to the NPPF out for consultation.

If **no change** occurs, EHDC should use the standard number as the starting point for the LDP (a current NPPF provision much quoted by Mr Gove), but make appropriate reductions based on SDNP accounting for 57% of the land area (as Lewes DC have), and whose premium house prices inflate the district's average and hence affordability index uplift.

If **changes to the NPPF are made**, they could have major impacts in how the EHDC standard method itself is calculated, further strengthen the method as only a starting point, and remove the need for a 5YHLS.

Moving ahead to determine the required annual standard method number at this time would be premature.



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**Local housing needs**

[The Housing and Economic Needs Assessment \(HEDNA\) 2022](#) sets out the overall housing need for East Hampshire district based on the standard method of calculating housing need, disaggregating the number between the two separate LPAs.

The housing need figure for the whole district, using the Government's standard method formula is calculated as 632 homes per year. For the Local Plan this means the housing need is 517 homes per year, which over the emerging plan period (2021-2040) equates to 9,823 homes, minus existing supply (completions, sites with planning permission, existing allocations, and a windfall allowance) = about 3,405 new homes to be planned for through the Local Plan.



**POP2 Are there any strong reasons not to use the housing need figure of 517 new homes per year for the Local Plan?**

Select one option

**POP2a Please explain your answer**

Tell us here

**YES**

See answers to POP1a.

According to the HEDNA, the target for housing in East Hampshire needs to be increased by 66% over and above the projected need of the inhabitants of East Hampshire. M&FM NP Steering Group believe that that is an unjustifiable burden on the local residents.

The affordability index is a flawed calculation only adding more and more higher priced dwellings and making them even further out of reach local residents as the affordability index climbs even higher.

the data suggests the opposite. According to the census data, over the last 10 years, the number of households in East Hampshire grew by over 11%. During this time, the number of households in Four Marks/South Medstead grew by over 25%. In neither area is there any evidence that this increase led to a reduction in house prices. Indeed, the data suggest the opposite. In the same period, house prices in the GU 34 area, have gone up by over 30%





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### Meeting the unmet housing needs of our neighbours

#### South Downs National Park Authority (SDNPA)

The housing need figure for the whole district, using the standard method equates to 632 homes per year.

For East Hampshire LPA area this means the local housing need is 517 homes per year, and for the SDNP LPA area 115 homes per year.

Past evidence for the South Downs Local Plan determined the need for 113 homes per year in the part of East Hampshire which falls within the National Park. However, given the policy considerations and the need to ensure that 'great weight' is given to "conserving landscape and scenic beauty in National Parks", the expectation is that the SDNP will not necessarily plan to meet these needs in full, giving priority to meeting affordable need and/or supporting the local economy and local communities within the SDNP.

Statements of Common Ground (SoCG) were agreed between the two LPAs to support previous emerging Local Plans, endorsing the position that the SDNPA will meet the requirement of 100 homes per year until 2028 (previous plan period).

The above numbers in terms of the previous and current need identified for the SDNPA are not significantly different – previously identified need of 113 homes per year and a commitment to deliver 100 homes per year, compared to current need of 115 homes per year.

Consequently, it is not considered that there is a strong argument to move away from a similar approach for the East Hampshire Local Plan 2040 by seeking agreement with SDNPA to meet the 115 homes per year identified in the [HEDNA 2022](#).

The SDNPA has also commenced a review of its Local Plan and revised evidence will be able to inform whether the assumption expressed above is realistic and deliverable.

**POP3 Based on the above should we meet**  
Select one option

All the housing needs of East Hampshire's part of the SDNPA

Some of the housing needs of East Hampshire's part of the SDNPA

None of the housing needs of East Hampshire's part of the SDNPA

**POP3a Please explain your answer**

Tell us here:

**None of EDHC's part of the SDNP**

We no longer will have a JCS with SDNP.

Therefore they should take an increased level of housing, not the proposed 517:113 ratio proposed.

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**Unmet needs of other planning neighbours**

[National planning policy](#) (para 11) requires local plans to 'as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas (as established through statements of common ground)'.

The location of East Hampshire district means it has a number of neighbours, in Hampshire, Surrey and West Sussex:



The Southern Parishes Clanfield, Horndean and Rowlands Castle also fall within the Planning for South Hampshire (PFSH) sub-area, which collectively undertakes research and publishes the results on various topics including housing.

In the light of the Government's Standard Method the PFSH authorities have started work on a revised sub-regional planning statement which will also function as a SoCG between the partners in due course. This will include a consideration of the revised housing figures for each local authority and an assessment of potential sites to meet this requirement by 2036 with a wider planning vision covering the period to 2050.

**POP4 At present we do not know the precise amount of unmet need but we are aware of our neighbours seeking help, therefore do we:**

Select one option

Offer to assist with all unmet needs, regardless of scale and location

Offer to assist with some unmet needs, where there may be a direct relationship with the communities of East Hampshire

Do not offer to assist with any requests from our neighbours

**POP4a Please explain your reasons**

**Do not offer to assist on unmet needs**

Our standard method targets are artificially inflated and too high already. Why should EHDC meet the unmet needs of other LPAs ?

How about they meet some of our upweighted targets (not needs) ?



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## DEVELOPMENT OPTIONS

### Development Strategy and Spatial Distribution



### How do we deliver our housing requirement?

The Government's objective is to significantly boost the supply of homes. It is important that a sufficient amount and variety of land can come forward where needed to meet the needs of groups with specific housing requirements.

The Council will need to find additional land for a minimum of 3,405 new homes by 2040 (see Population & Housing section for further details). Land will likely be needed for other kinds of development too – such as for new offices and business units – but the evidence strongly suggests that new housing is likely to require the most land. One of the main decisions for the emerging Local Plan will therefore be: where should the new homes be built? Answering this question will effectively determine the distribution of most new development over the plan period.

New housing development will have different social, environmental and economic effects depending on where it is built.

There is no opportunity to comment here.

The government's policy as demonstrated in the NPPF consultation is no longer to significantly boost housing and to offer more protection for communities from unsustainable, badly designed housing in appropriate locations.

Four Marks / south Medstead has suffered 15 years of exactly that without any additional significant infrastructure, and we have no wish to repeat that type and scale of development.



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The existing Local Plan (the Joint Core Strategy) split the district into three areas, namely: 'North of the SDNP', the 'SDNP' and the 'South'. Its strategy was to direct new development to what were considered to be the most sustainable and accessible locations in the district at that time.



Our understanding of the planning issues for future development has changed.

In 2022, we understand:

- More about the fundamental importance of tackling the Climate Emergency
- More about how we must improve the quality of the local built and natural environments.

We have an up-to-date evidence base that has refreshed our understanding of the amount and type of housing that's needed.

With these issues in mind, there are different principles that the Council could follow in searching for the land to meet our housing needs.

In this consultation, the Council is asking for your help to select the right high-level principles. These principles can be distinguished in terms of the areas or settlements within the planning area that would be prioritised for exploring where new housing should be located.

This means:

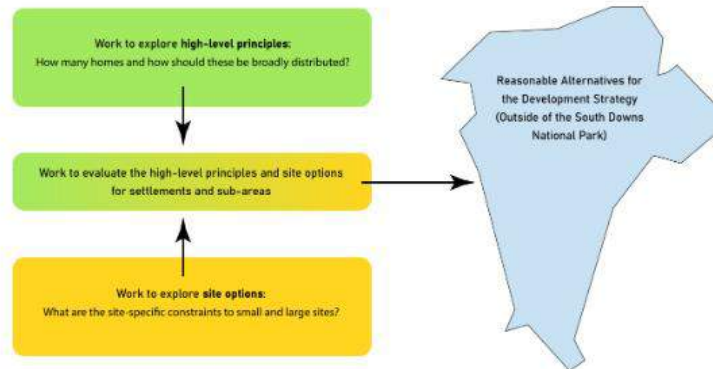
- We're not asking you about particular sites or even neighbourhoods for where new housing could and should be built;
- Instead, we're asking you to consider some different high-level principles, so that you can give us your views on them;
- Your views can then help the Council to define the options for housing development, which will form part of the next Local Plan consultation.

It's important to follow the right process in defining options for new housing and there are choices to be made within that process. By giving us your views on the following options, you'll be helping the Council to make the right choices – and ultimately to select the best sites for new homes.

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**Investigating the high-level principles**

The Council must define its options for where new housing could be located in accordance with the statutory process of ‘sustainability appraisal’ (SA). The Council’s procedure for the SA has always been to explore high-level principles for sustainability alongside exploring potential development sites themselves – that is, their site-specific constraints and opportunities. This procedure can be summarised as follows:



**Options for the distribution of new housing**

There are different ways of looking at where new housing could be located. We have identified four high level options to inform where development could be located.

- **Option 1:** Disperse new development to a wider range of settlements: housing growth should be distributed to more settlements, but in accordance with a revised settlement hierarchy that prioritises accessibility by walking and cycling
- **Option 2:** Concentrate new development in the largest settlements: housing growth should be focused in larger settlements with more facilities and services
- **Option 3:** Distribute new development by population: housing growth should be distributed in proportion to existing population levels
- **Option 4:** Concentrate development in a new settlement: housing growth should be concentrated in a new settlement, or in a large urban expansion to one or more existing settlements

These options are described and illustrated over the following pages, with pros and cons for each option identified to help inform your comments.

Following the consideration of comments from this consultation, the Council will determine its preferred development strategy. The selection of sites will be further informed by site- and settlement-specific constraints and opportunities.



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**Option 1: Disperse new development to a wider range of settlements**

This option would involve the development of new homes in a wider range of settlements (in comparison with Option 2), potentially including some of the smaller villages of the planning area.

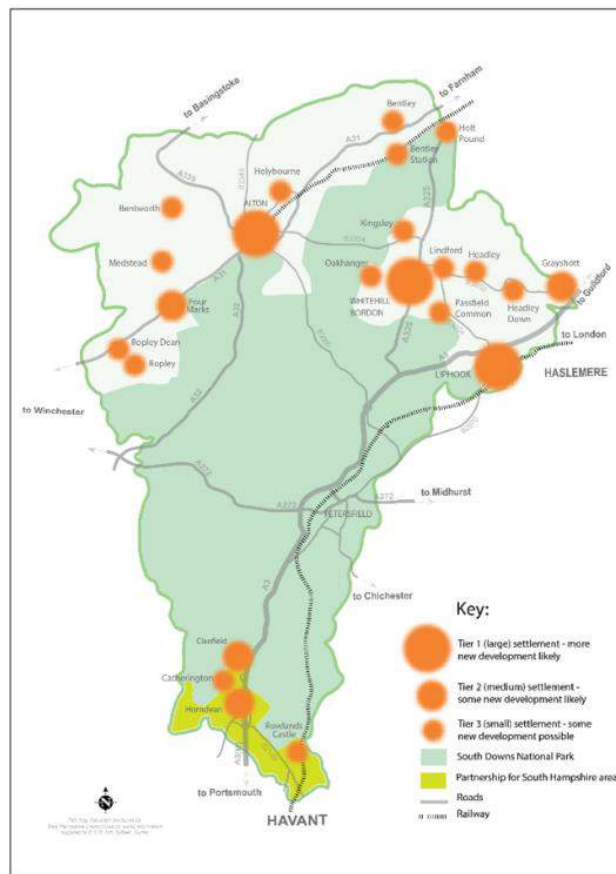
A revised settlement hierarchy, based on the concept of living locally and potential accessibility to local services and facilities by walking and cycling, has been prepared for this consultation. This shows that whilst the largest settlements give people the greatest opportunity for walking and cycling to shops, schools and public transport connections, fewer differences emerge between the smaller settlements. There could be some opportunities to develop new homes close to the existing schools in our villages. The underlying reason for distributing development according to this option would be to make the most of opportunities to increase walking and cycling as modes of transport, for this could help to reduce transport-related greenhouse gas emissions, which contribute significantly to emissions in our district.

Depending on the sites that are selected to deliver this option, it could be good for:

- Mitigating greenhouse gas emissions relating to transport
- Meeting the needs of rural communities
- Avoiding impacts on the most important wildlife habitats

But it could also be less good for:

- Reducing the need to travel long distances to meet some of our everyday needs
- Meeting affordable housing needs in our largest communities
- Avoiding impacts on the character of rural landscapes within the planning area



*Option 1: Disperse New Development to a wider range of settlements*



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**Option 2: Concentrate new development in the largest settlements**

This option would involve concentrating the development of new homes in around ten of the largest settlements of the planning area, which have more facilities and services than the smallest rural villages.

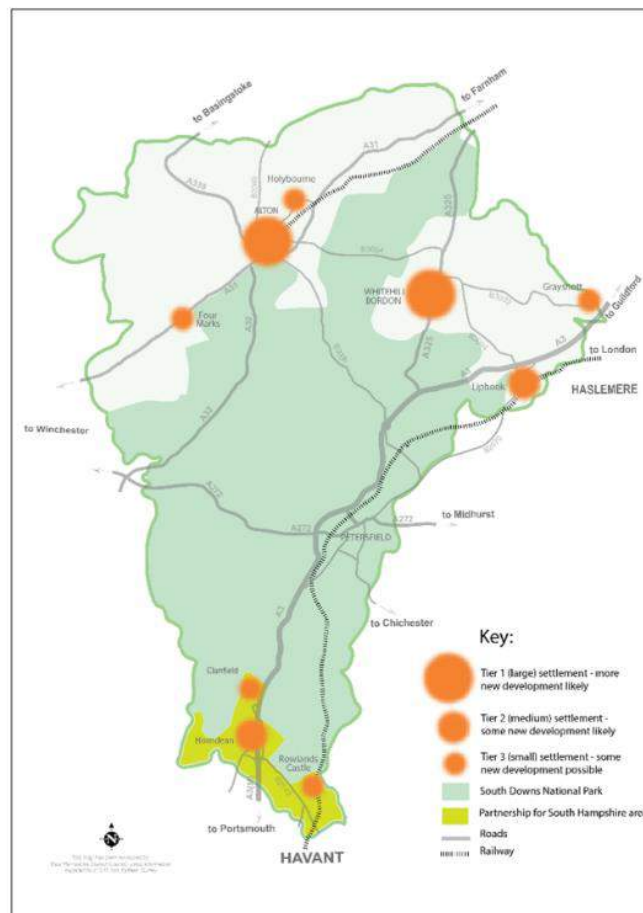
The [Draft Local Plan of February 2019](#) identified potential new housing sites by taking account of a settlement hierarchy, which was based on the presence of and distance to services and facilities for different settlements in the planning area. It would be possible to continue with this approach, which is very similar to that of the adopted Local Plan (only updated to take account of changes to services and facilities). The underlying reason for doing this would be to take account of where people are likely to travel to meet their everyday needs, and provide more housing in areas that are closer to these destinations. This could help to manage the need to travel—but there has been no special focus on accessing services by walking and cycling with this option, so there is a risk that it would continue East Hampshire's higher-than-average dependence on the car.

Depending on the sites that are selected to deliver this option, it could be good for:

- Reducing the need to travel long distances to meet everyday needs
- Accessibility to local employment and training opportunities
- Meeting affordable housing needs in our largest communities

But it could also be less good for:

- Mitigating greenhouse gas emissions relating to transport
- Meeting the needs of rural communities
- Avoiding impacts on the most important wildlife habitats



*Option 2: Concentrate new development in the largest settlements*



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### Option 3: Distribute new development by population

This option would involve the development of more new homes in areas where population levels are highest.

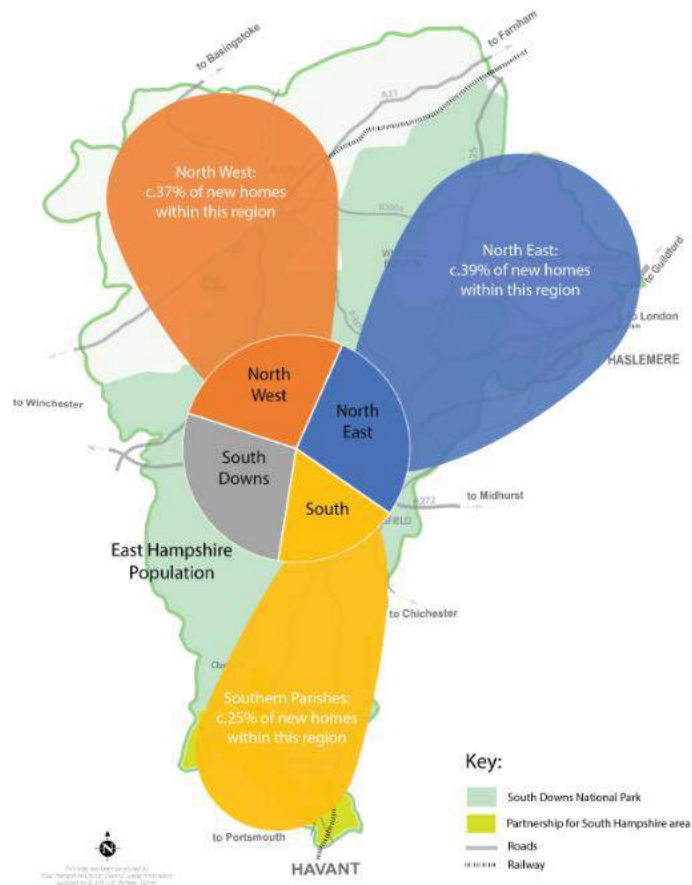
The Council's evidence ([HEDNA 2022](#)) shows that 72.5% of East Hampshire's population in 2020 was located in its planning area, with the remainder of the population in the SDNP. Different numbers of people live in the North East, the Southern Parishes and the North West parts of the planning area, so it would be possible to identify land for new housing in proportion to these numbers. The underlying reason for doing so would be to place new homes within, or in close proximity to communities that could best accommodate the growth. This could avoid the situation of smaller communities being overwhelmed by large-scale growth.

Depending on the sites that are selected to deliver this option, it could be good for:

- Mitigating greenhouse gas emissions relating to transport
- Accessibility to local employment and training opportunities
- Meeting affordable housing needs where they arise

But it could also be less good for:

- Building homes in areas with the lowest risk of flooding
- Supporting the growth and prosperity of south Hampshire
- Avoiding impacts on the most important wildlife habitats



Option 3: Distribute new development by population





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**Option 4: Concentrate development in a new settlement**

This option would involve allocating a new settlement for over 1,500 new homes accompanied by new community facilities, employment opportunities and open space, reducing the amount of new housing in or adjoining existing settlements.

In 2019, the Council identified some "large development sites" that were thought to have potential for 600+ new homes and other supporting development. Some of those large sites might be too small or too constrained to create sustainable new communities in their own right. Others remain as possible site options for the emerging Local Plan. However, for this consultation, it is important to consider whether there are larger new settlement options that could accommodate 1,500+ new homes. Sites of this scale could follow the principles for developing "garden villages".

The underlying reason for concentrating development in a new settlement is that it could enable new infrastructure, services and facilities to be developed in close proximity to new housing. The phased delivery of new development could also be masterplanned to avoid any delay between new homes and the infrastructure that is intended to meet their needs.

In order to fully meet our housing needs, this option would also require further development in other locations.

Depending on the site(s) that are selected to deliver this option, it could be good for:

- Mitigating greenhouse gas emissions relating to development
- Meeting the district's affordable housing needs
- Avoiding impacts on the most important wildlife habitats

But it could also be less good for:

- Building homes in areas with the lowest risk of flooding
- Meeting the development needs of existing communities
- Supporting the growth and prosperity of south Hampshire

**Choosing the best option to inform a strategy**

The preceding options all concern the high-level principles that the Council should follow, when determining its "reasonable alternatives" for the new land allocations of the emerging Local Plan.

**DEV1 Please rank these options in order of preference**  
Sort in order of importance

Option 1: Disperse new development to a wider range of settlements	1
Option 2: Concentrate new development in the largest settlements	2
Option 3: Distribute new development by population	3
Option 4: Concentrate development in a new settlement	4

**DEV2 Why have you ranked the options this way?**  
 Please give reasons for your chosen ranking

There is no 'none of these options' to use

M&FM NPSG proposes a new 'Option 5' : Focus new development on providing smaller, low cost accommodation to meet the needs highlighted by the demographic trends There are important demographic trends forecast for East Hampshire (c.f. the HEDNA) which confirm the need for smaller, low cost accommodation.

The main areas of need are: -

1. For the ageing population	2. Young people trying to get on to the housing ladder
3. Those with no or low quality housing	4. Keyworkers on low wages

This would focus on delivering new housing to meet the critical needs of these groups who form the community's housing need, rather than a high margin demand for yet more commuter executive homes for those moving out of cities and large towns.

Whilst these are very disparate groups, they tend to have one thing in common – they have a need for smaller, lower cost accommodation.



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In addition to this “top-down” approach to planning for new development, we will also need to consider the site-specific constraints and opportunities for the land that is being made available for development.

When taking account of site-specific information, it is likely that the emerging Local Plan would include sites that do not fit neatly under one or more of the four options. However, it’s important that the process of site-selection starts from the right point of departure.

**DEV3 Are there any alternative options we should consider?**

Select one option

Yes

No

**DEV3a If yes, please explain**

Please tell us of any other development options we should consider

**Yes**

Transport connectivity, including better public transport and cycle/walking routes.

Real 20 minute neighbourhood planning with adequate facilities and resources, based on actual journey times, not theoretical “” assessments. Nor should the factually incorrect Settlement Hierarchy selection be used as a determining factor.

A proper full accurate assessment of both issues should be conducted.

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## EAST HAMPSHIRE LOCAL PLAN 2021-2040

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**TYPES OF HOUSING NEED**

### Introduction

Our local communities are changing, in particular, they are getting older. We need to understand this and what it means for our Local Plan and housing needs up to 2040. (See section on [Population and Housing](#)).

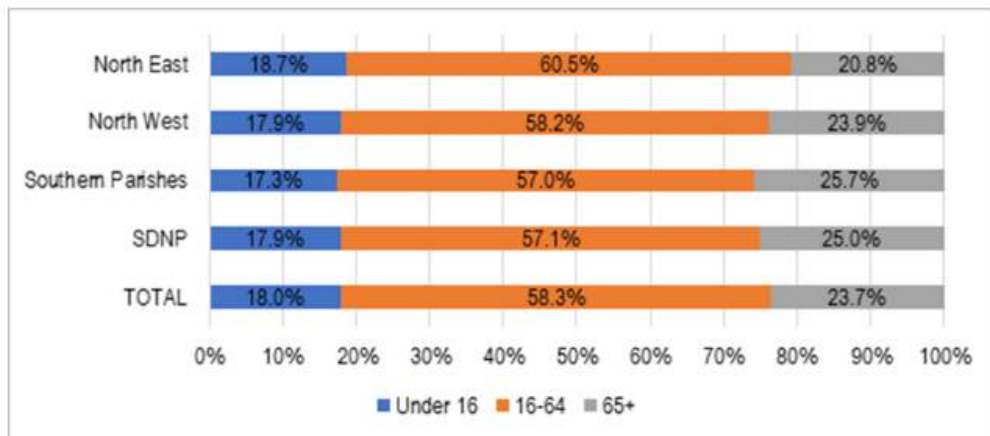
The [HEDNA 2022](#) examined the district in terms of the four distinct areas that now exist as a result of SDNP:

In terms of distribution of the district's population this can be seen on the plan below:



Source: ONS (Table 6.1 [HEDNA 2022](#))

Age profiles of the sub-areas (2020) indicate the following distribution:



Source: ONS mid-year population estimates (Figure 6.2 [HEDNA 2022](#))



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Interestingly there are no significant differences between the different areas, the exception being the total population of the Southern Parishes, but this reflects this being a smaller part of the district.

Likewise with age distribution there are no marked differences across the district, the only notable differences are the North East sector having a slightly higher working population and lower over 65 cohort. This may link to the fact this area covers the regeneration of Whitehill and Bordon and the provision of new family homes in the area.

In terms of how the population has changed since the Census 2011, research indicates that population levels in East Hampshire have risen at a similar rate to other areas. In 2020, it is estimated that the district's population had risen by 13% from 2001 levels; from 2011 to 2020 the population increased by about 7%.

Headline data from Census 2021 – our district has:



- 125,700 residents, a 10,100 person (8.7%) increase from 2011;
- 61,000 male residents and 64,700 female residents;
- 52,700 households, an 11.5% increase from 2011;
- 30.5% more residents aged 65+, 4.1% more residents aged 15-64 and 2.4% more children aged under 15 than in 2011;
- 38 residents aged 65+ for every 100 people aged 15-64. (It was 30 in 2011);
- 27 under-15s for every 100 people aged 15-64, similar to 2011.

**No opportunity to comment**

The increased number of residents (8.7%) and households (11.5%) has been stimulated by the excessive housing targets in 2013 JCS which were significantly higher than in 2006 Second Review due to the abolition of bottom-up Regional Planning in 2011, and the rejection of the EHDC housing targets at post Reg 19 Examination creating a speculative application free-for-all with little new infrastructure.

Significant levels of household growth have been stimulated by the higher dwellings numbers (in Bordon & Whitehill, Four Marks & South Medstead, and Alton especially. These have accelerated inward migration and added extra growth to local needs.

**Ageing population and older persons accommodation**

So, if the 2021 Census, is indicating that approximately a quarter of our residents were aged 65 years and over, what does this mean for the Local Plan looking ahead to 2040?



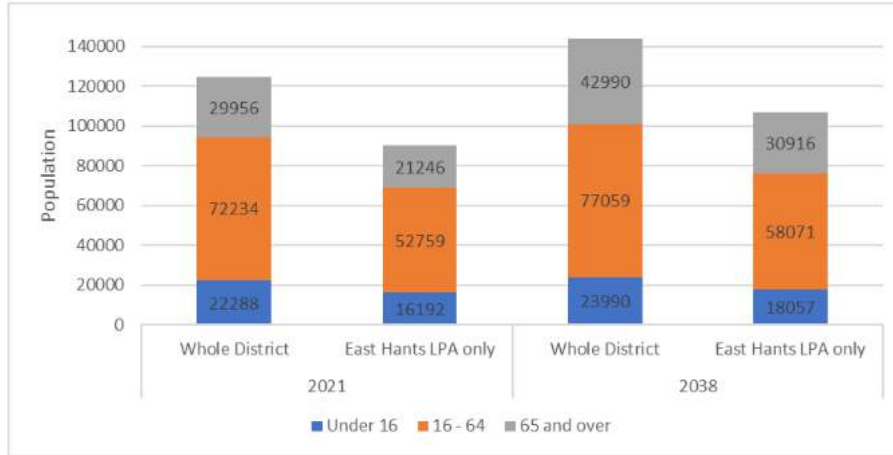
The increase in the over 65's is also reflected in data included in the [HEDNA 2022](#) which explores the population change by broad age bands from 2021 – 2038, when linking growth to the delivery of 632 homes per year over the whole district and 517 homes per year in East Hampshire LPA only:



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Projections of population change 2021 – 2038 by broad age bands:



Age	Whole district	East Hants LPA only
Under 16	7.6% (1,702)	11.5% (1,885)
16 - 64	6.7% (4,825)	10.1% (5,312)
65 and over	43.6% (13,034)	45.5% (9,671)
TOTAL	15.7% (19,560)	18.7% (16,848)

Source: [HEDNA 2022](#) Tables 6.12 and 6.13

These projections highlight a growing proportion of people over 65 years in the district. This has implications for the type of housing that needs to be provided through the Local Plan. This may be age specific specialised accommodation (care homes) or simply smaller units to allow those looking to downsize the ability to do so and homes that can be adapted to meet individuals changing needs as they age.



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**HOU1 What should a specific policy on older persons accommodation include?**

Select one or more options

A specific target in terms of numbers of homes for older persons accommodation to be delivered within the plan period

Specific types of homes to be provided

The location of these homes across the district

**HOU1a Please explain your reasons**

Please provide an explanation of your choice here

**HOU2 Is there anything else that should be included in this policy**

Let us know here

✔ We've got your email: [REDACTED]

**All three options**

HOU1a It is also noticeable that the forecast increase in the population of '65 and over' is 13,034. Assuming that the average members of these households will be 3 or less that indicates a need for 4344 homes. This suggests that most (if not all) the new housing in the Local Plan should be built for this group. This group is not homogeneous. As it represents such a large percentage of the forecast growth, it is important that policies are designed for each of the component parts –

- The fit and healthy (who want to down-size)
- Those that wish to move to a community for senior citizens
- Care homes
- Nursing homes.

**HOU2 - no further comments**

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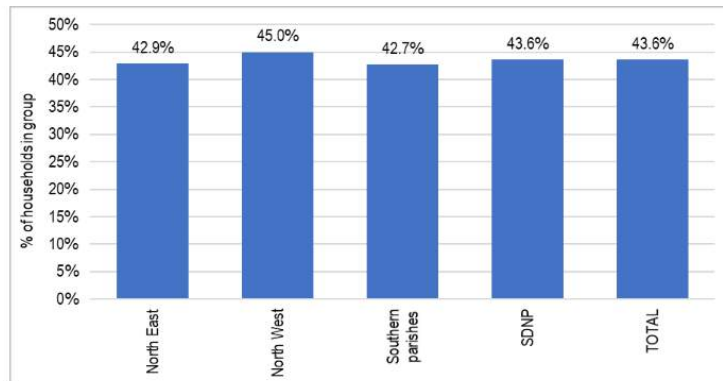
**Housing needs of disabled people**



Planning guidance requires the provision of appropriate housing for people with disabilities or simply those that may need support to live independently, which would also apply to older persons.

Analysis in the [HEDNA 2022](#) includes reference to households with a long-term health problem or disability as per 2011 Census and indicates that there are no distinct variations across the district. However, generally speaking a quarter of households include someone with a health problem.

In relation to the older population this is more revealing, and typically just over 40% of the population aged over 65 years has a long-term health issue:



Source: Census 2011 ([HEDNA 2022 Fig 8.4](#))

What is more concerning is how this will change over the plan period and again research reveals:

*Turn landscape to view table on a mobile device*

Disability	Age Range	2021	2038	Change	% Change
Dementia	65+	1,801	2,962	1,161	64.4%
Mobility problems	65+	4,658	7,214	2,555	54.9%
Autistic Spectrum Disorders	18-64	488	520	33	6.7%
	65+	230	332	102	44.3%
Learning Disabilities	15-64	1,300	1,392	92	7.0%
	65+	512	728	216	42.2%
Challenging behaviour	15-64	24	26	2	6.6%
Impaired mobility	16-64	3,179	3,153	-27	-0.8%

Source: [HEDNA 2022 Table 8.6](#)

This data indicates that the Local Plan needs to be pro-active in ensuring new housing meets the changing needs of its population.



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**HOU3 Should the Local Plan include a specific policy on adaptable housing?**

Select one option

Yes

No

**HOU4 Should there be a requirement on large sites for a percentage of new homes to be adaptable?**

Select one option

Yes

No

**HOU4a Please explain your answer**

Tell us here

**Yes**

**Yes**

The LDP need to deliver appropriate facilities for the wide range of issues, especially facilities to deal with the growing dementia.

Sadly the communication between HCC, EHDC, and NHS Trusts & CCGs is far too superficial and at a time of staff shortages across the NHS and Care sector promised, or even well-intentioned thoughts, new facilities are not forthcoming in a timely manner.

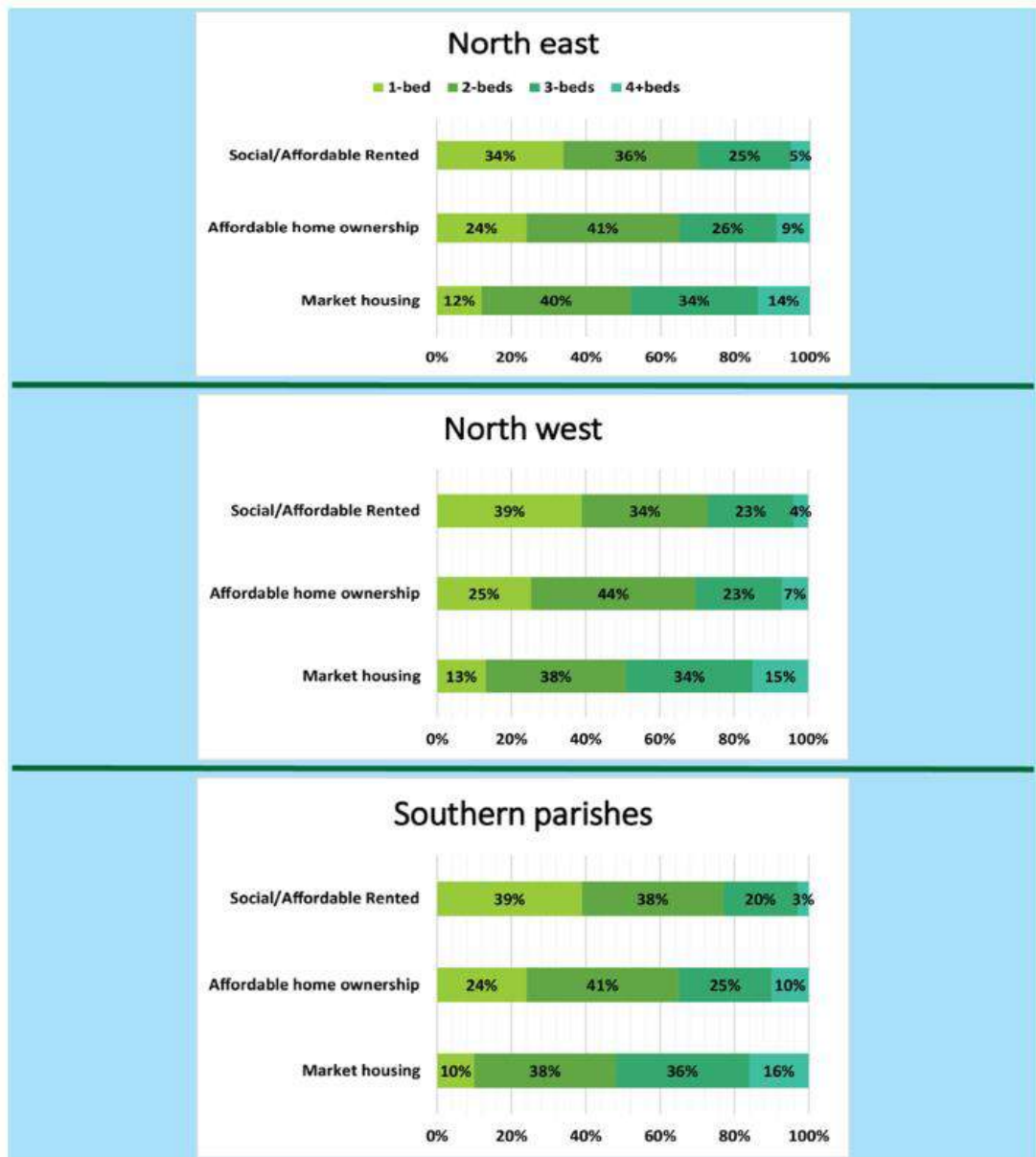


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**Home sizes and mix**

When looking at the need for different sized homes the [HEDNA 2022](#) has modelled these for both market and affordable housing.



Source: Housing Market Model [HEDNA 2022](#) table 9.14 to 9.16



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Whilst there are differences between the market and affordable tenures, there's no distinct spatial variations. Therefore, it is not considered that any differences are sufficiently clear-cut to suggest a different mix of housing at a sub-area level.

But it is possible through the Local Plan to include a policy which expresses a specific percentage or a range of percentages for 1-2 bed homes, 2-3 bed homes etc. Such an approach would ensure a supply of smaller homes, to be occupied by a cross section of the population, new families, single people and older people regardless of location.

**HOU5 Should the Local Plan include a policy to specify the percentage of smaller homes on development sites?**

Select one option

**HOU5a If yes, should this percentage focus on:**

Select one option

**HOU5 Should a percentage of smaller homes to be provided on:**

Select one option

**HOU5a Please explain your answer**

Tell us here

**Yes.**

**All development sites of 15 dwellings or higher**

Although it will be a constraint on developers and no doubt a target for future viability study arguments

Equal emphasis on 1-2 bed homes (for starter and downsizing) and 2-3 bed homes (for starter and young family).



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**Affordable housing**



In terms of affordable<sup>[1]</sup> housing, analysis shows a total need for 613 affordable homes across the district per year. This equates to 97% of the standard method local housing need figure (632).

If the Council's adopted affordable housing policy at 40% was applied, overall housing need would equate to 1,535 homes per year (compared to 632) if the full extent of affordable housing need was to be met.

Evidence from the [HEDNA 2022](#) confirms that both of these scenarios are unrealistic, but that it is clear that provision of new affordable housing is an important and pressing issue in the area.

It should be noted that the amount of affordable housing delivered will be limited to the amount that can viably be provided. The evidence does however suggest that affordable housing delivery should be maximised where opportunities arise.

It is also important to note that the intention of the standard method and its use of an affordability uplift is to improve affordability of market housing over time. Therefore, this envisages reducing the cost of market housing relative to earnings, which as a result would reduce affordable housing need, but this would take some time to be achieved.

[1] See Glossary for full definition of affordable housing from a planning perspective

**HOU7 The current requirement is that 40% of new homes on qualifying sites are affordable homes? Should the % requirement for affordable homes be:**

Select one option

Increased

Decreased

Stay the same

**HOU7a Please explain your answer**

Tell us here

**Increased**

We recommend that the debate about Affordable Housing should be re-framed. It should be based on the principle of what people can afford. In other words, it should start with an analysis of what people earn – rather than being based on a discount from the market price. We welcome the recent EHDC ambition and statements on real affordability, see [Bringing affordable homes to East Hampshire | East Hampshire District Council \(easthants.gov.uk\)](#), rather than the governments national 20% discount off market price.

This is essential to meet the needs of the key groups - young couples; keyworkers; those in poor quality housing; and the retired. The proposed new approach would define homes as affordable: - For owners: if homes were priced no more than 4.5 times the median earnings for a couple in the District



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- For renters: if the rent was no more than 35% of net household income Policies should be designed to differentiate between ownership and renting.

i) Ownership: the policy should be based on what can be afforded in terms of a mortgage. The calculation above indicates a figure of less than £300,000.

ii) Private Rented: there is a need in East Hampshire for more rented housing. The policy should be based on earnings

iii) Social rented housing: there is an urgent need in East Hampshire for more social rented housing. It is important to address the housing needs of the people who already live in the district but suffer from inadequate housing. This is a major issue and should be the focus of a number of policy initiatives.

The Affordability Ratio is one of the key aspects of the Standard Method of calculating housing need that we believe to be 'unfair'. According to the HEDNA, the target for housing in East Hampshire needs to be increased by 66% over and above the projected need of the inhabitants of East Hampshire. We believe that that is an unjustifiable burden on the local residents. We also believe that the fundamental rationale for the Affordability Ratio is flawed. The rationale put forward is that a significant increase in the supply of housing will lead to a material reduction in the price of housing, making housing more affordable to the many local residents who are currently priced out of the market.

We can find no evidence to support this thesis. In fact, the data suggests the opposite. According to the census data, over the last 10 years, the number of households in East Hampshire grew by over 11%. During this time, the number of households in Four Marks/South Medstead grew by over 25%. In neither area is there any evidence that this increase led to a reduction in house prices. Indeed, the data suggest the opposite. In the same period, house prices in the GU 34 area, have gone up by over 30%. There are a number of reasons as to why the market may have responded in a way that is diametrically opposite from the one that was posited. We highlight two of them: i) The Affordability Ratio has a built in incentive for developers to build more expensive houses. The algorithm used means that the more houses that are built above the median house price the greater the number of houses that the LPA is required to get built. ii) These houses are attractive to those who want to move out of London. For those who have sold at London prices, this is an attractive opportunity to move to the countryside. This then prices local residents out of the market. With regard to the detail of the calculation of the Affordability Ratio, we are also concerned about the data set that has been used to generate the figure of 14.51%. An analysis of the data included in the HEDNA suggests that - Some of the trends implied by the data are unreliable - The actual Affordability Ratio could be as low as 9.8%. This is very significant, because a re-assessment of the Affordability Ratio could lead to a reduction of 112 dwellings pa or 1680 across the period of the Plan. We recommend that the whole data set for the Affordability Ratio is subject to a rigorous review before any strategic options are considered.



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### Other forms of housing

Planning guidance is clear that we are required to plan for the housing needs of our population.

The main types of housing need have previously been expressed, however, there is also a demand for self and custom build housing where the local authority is required to hold a register of those interested in acquiring a plot and building their own home.

There are other forms of housing that we are required to consider and plan for if needed, including self and custom build plots and Traveller accommodation.

**HOU8 Are there any other forms of housing that the Local Plan should refer to?**

Select one option

**HOU8a If yes, then please state what other forms of housing**

✔ We've got your email: [REDACTED] ^

### YES

Applications for self and custom build dwellings should be encouraged, emphasising carbon zero and renewable energy options such as found in the Passive Haus movement.

Four Marks & South Medstead have delivered a significant share of the District's Traveller and Showpeople housing requirements in the last 5 years and propose that greater emphasis is placed on the PPTS 2016 policies related to the impact of character of the existing build environment. It is also prudent to review or introduce appropriate policies that encourage such sites to be spread around the built area not concentrated nor be isolated in countryside



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### Infrastructure



We rely on infrastructure to support our daily lives. It is vital when planning for our area's future that full account is taken of the infrastructure needed to deliver sustainable growth and what opportunities there are to help reduce gaps in existing provision. It is also critical to ensure these essential facilities and services are delivered at the right time and in the right place.

What do we mean by 'infrastructure'?

The term covers a wide range of services and facilities, from those we use every day to others we use more occasionally. It includes things like:

- Public transport - buses, trains and bike hire schemes
- Footpaths and cycle routes
- Roads
- Health services - such as GPs and hospitals
- Schools and colleges
- Sports facilities - both indoor and outdoor
- Internet and telephone connections
- Water (both drinking and waste)
- Energy supplies
- Green spaces - parks, country parks and more informal areas of open space
- Community facilities, including places of worship

Whilst we don't directly provide much of this infrastructure, it is important that when planning for our area we work with the relevant providers to ensure these services and facilities are provided at the right time and in the right place. New infrastructure should be planned so that it brings benefits to existing as well as new residents and employers.

What you've told us so far

- Infrastructure in the district is well used and highly valued
- New homes will put too much pressure on existing infrastructure
- The road network is struggling to cope at particular locations
- There are localised water capacity and pressure issues
- Support for better connectivity; cycle lanes and walking routes
- Keen to see infrastructure provided prior to development.



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**F1 What type of infrastructure is most important to you?**

Sort in order of importance

- Transport
- Health
- Schools, colleges
- Community facilities
- Sport
- Green spaces
- Energy supplies and water
- Internet and mobile phone reception

**INF1 What type of infrastructure is most important to you?**

Sort in order of importance

- Energy supplies and water
- Health
- Schools, colleges
- Transport
- Green spaces
- Internet and mobile phone reception
- Community facilities
- Sport

These cannot be ranked as all play a part in the support of the Community the Parish Councils represent and the NP the SG has produced and reviews.

The rank will vary depending on individuals life stage and circumstances but this is the rank I settled on as a mixed interests compromise.

Work done to support our Local Plan highlights localised gaps in infrastructure, and issues that are also experienced in many other places, such as lack of NHS dentists.

New development brings with it new demand for public services and infrastructure. The planning system offers a way of mitigating those impacts and enabling new/more efficient infrastructure to be provided.

Alongside the Local Plan, there will be an Infrastructure Plan. This will identify what infrastructure is needed to support the growth planned, how it will be delivered and by whom. Unfortunately, the Local Plan cannot fix all outstanding infrastructure issues, but it can ensure development contributes towards improving local infrastructure, as it already does.

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Local GP Practice in Alton allocated CIL funding in 2022 (Photo provided by Studio Four Architects)

When new housing is built, the developer pays into the Community Infrastructure Levy (CIL) fund, administered by the Council, to mitigate against the impacts of the development on local infrastructure. A small portion of this money is passed to the parish and town councils to spend.

Infrastructure providers then bid for funding, to resource projects that support our district.

Local infrastructure improvements are primarily funded by CIL money. In some cases, infrastructure is paid for by another means called S106 agreements – this is generally used for infrastructure that is specifically linked to a development. Other sources of funding are extremely limited and pressured.

Without new homes, the money available to fund infrastructure improvements significantly diminishes, as too does the money passed to parish and town councils to do the same.

Since 2016, approx. £10.5m of CIL has been paid by developers. Approx. £1.5m of this has been passed to our parish and town councils to spend.

£4,262,586 has been allocated by the Council to specific infrastructure projects, listed below. Funds remain and the fund grows as new homes get built. Bidding for infrastructure projects will open again in February 2023.

	Four Marks	Community Building and Recreational Hub	£1,250,000
	Liphook	Bohunt School 3G artificial grass pitch & floodlights	£710,348
	Alton	Alton Station Forecourt	£427,371
	Clanfield	Clanfield Parish Council car park improvements	£86,414
	Chawton	Chawton Park Surgery extension	£50,000
	Clanfield	Clanfield Cricket Pavilion	£196,000
	Medstead	Medstead Parish Council Community Facility	£150,000
	Horndean	Five Heads Playground	£34,000
	Holybourne	Treloars Swimming Pool & facilities	£190,000
	Alton	Anstey Lane Pump Track	£57,450
	Horndean	Horndean Technology College Tennis Courts	£209,197
	Oakhanger	Shortheath Common boardwalk	£28,198
	Alton	Alton Community Hub	£467,278
	Alton	Wilson Practice same-day services	£29,830.36
	Bentley	Bentley Memorial Hall refurbishment	£12,500
	Haslemere	Woolmer Hill 3G pitch & pavilion	£350,000
	Beech	Beech roadside footways	£14,000

Although £1.25m of CIL has been allocated to Four Marks for a Community Building, it cannot yet be considered part of the infrastructure as it is still in community consultation and no planning application has been lodged let alone any building works commenced. Only infrastructure that currently exists should be considered as part of any Settlement Hierarchy ranking.





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**INF2 How do you feel about the allocation of CIL funds to date?**







Very happy      Happy      Neutral      Unhappy      Very unhappy

Very happy Very unhappy

**Happy – but it is a loaded question.**

With a NP we retain 25% of CIL in Parish. The EHDC CIL ‘pot’ (and S106) has been allowed to grow for years due to the difficulty in securing funds for projects in a timely manner, with application and grant windows highly restrictive.

The major housing developments in 2013-2028 have been in south Medstead and so allocated to Medstead PC where significant struggling community infrastructure is in Four Marks parish.

Although £1.25m of CIL has been allocated to Four Marks for a Community Building, it cannot yet be considered part of the infrastructure as it is still in community consultation and no planning application has been lodged let alone any building works commenced. Only infrastructure that currently exists should be considered as part of any Settlement Hierarchy ranking.



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**How, where and when infrastructure is provided can relate to the size of new development.**

Many small sites dispersed across the district

- Pay CIL and help fund many infrastructure projects
- No identified local infrastructure provision – provision depends on infrastructure provider bidding for CIL funds

Medium sized sites

- Pay CIL and help fund many infrastructure projects
- May have some small local improvements tied to the development, such as junction improvements
- Greater local impact but little identified local infrastructure provision - provision depends on infrastructure provider bidding for CIL funds

Large sites

- Pay CIL and help fund many infrastructure projects
- Likely to be infrastructure required on site to ensure the development is suitable in planning terms, such as a new school, sports pitches
- Identified local infrastructure provision
- Greatest provision of infrastructure locally

**INF3 Which of these do you think provides the best outcome for infrastructure provision?**

Select one option

Many small sites dispersed across the district

Medium sized sites

Large sites

A mix of these

**INF3a Please explain your answer**

Please provide an explanation for your choice here

Again another binary single selection question, which implies that large sites are required to get any new infrastructure.

**A mix of these.**

The size of sites or selection of a specific spatial strategy selected should not determine if any infrastructure, or its size & type, is provided.

The primary need is to deliver the required housing numbers and so the spatial strategy may be constrained by availability of suitable sites.



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**Gypsy, Traveller and Travelling Showpeople accommodation**



*An example of new build Traveller accommodation*

It is important for the Local Plan to provide for the housing needs of gypsies and travellers and travelling showpeople, through the identification of land suitable for travellers pitches and plots.

The latest version of the [Gypsy and Traveller Accommodation Assessment](#), indicates a need for 62 pitches for gypsies and travellers and 46 travelling showpeople plots for the period 2020 – 2036 (this will be updated to reflect the revised plan period to 2040).

We need to know where land suitable for gypsy, traveller and travelling showpeople accommodation may be available to accommodate the above number of pitches and plots.

If you know of possible land for this use in East Hampshire, please tell us about it.

**Please do not use this call for sites to suggest or resubmit site suggestions for housing.**



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**CFS1 Please describe where the land is and provide an address if possible**

e.g. street name, local area, what landmarks are nearby

**CFS1a Please upload any maps or photos of the land you are suggesting**

Upload files (max 3)

Please only upload content that you have permission to use.

File size limit: 40 MB



**Drop files to upload**

or

**Browse files**

Supported files

.jpg .jpeg .png .pdf

✔ We've got your email [REDACTED]

Not place to comment for Medstead & Four Marks Neighbourhood on the wider considerations of Gypsy, Traveller, and Showpeople planning polices



[Have Your Say Today - Introduction - East Hampshire Local Plan \(commonplace.is\)](https://www.commonplace.is)

**Call for Sites - 'Green Sites'**



These include Suitable Alternative Natural Greenspace (SANG), Biodiversity Net Gain and/or Nutrient Neutrality mitigation sites.

We need to know where land could be suitable for:

**Suitable Alternative Natural Greenspace (SANG)** – this is the name given to the green space that is of a quality and type suitable to be used as mitigation in the context of the Wealden Heaths Phase II Special Protection Area (SPA). The land should be within close proximity to the Wealden Heaths Phase II SPA.

**Biodiversity Net Gain (BNG)** – Sites for BNG offsetting should have the potential to buffer or expand existing habitats. For example, connecting woodland blocks, buffering ancient woodland and species rich grassland creation.

There is no minimum or maximum site area.

Exceptions are private gardens or sites already designated for wildlife value i.e. SSSI, Local Wildlife Site

**Nutrient Neutrality** - Nutrient neutrality is a means of ensuring that a development plan or project does not add to existing nutrient burdens within catchments, so there is no net increase in nutrients as a result of the plan or project. Suitable mitigation measures might include constructed wetlands, changes in land management or retrofitting Sustainable Urban Drainage systems within the catchment of the impacted site(s).

If you know of possible land for these uses in East Hampshire, please tell us about it.

**Please do not use this call for sites to suggest or resubmit site suggestions for housing.**

**CFS2 Please describe where the land is and provide an address if possible**

e.g. street name, local area, what landmarks are nearby

**CFS2a Please upload any maps or photos of the land you are suggesting**

Upload files (max 3)

Please only upload content that you have permission to use.

File size limit: 40 MB

Drop files to upload  
or  
Browse files

Supported files  
.jpg .jpeg .png .pdf

We've got your email

Not place to comment for Medstead & Four Marks Neighbourhood on the wider considerations of SANGs, Net Bio-diversity, or Nutrient Neutrality planning policies.



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### How to Respond



This Issues & Priorities consultation is available for public consultation for a period of eight weeks between

**21 November 2022 and 16 January 2023.**

Although these documents only normally need to be consulted for a period of six weeks, we have extended due to the festive period and in order to maximise engagement.

There are a series of consultation questions throughout the document and on our dedicated digital engagement platform.

Your responses to the questions can be submitted through the digital engagement platform.

Alternatively, responses can be sent to us:

**By email:** [localplan@easthants.gov.uk](mailto:localplan@easthants.gov.uk)

**By writing to:**

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

**Please do not resubmit comments made before, particularly about topics and sites that aren't included in this consultation.**

This consultation does not include proposed development sites or detailed planning policies.

All submitted representations will be made public and personal information will be removed in accordance with the Council's [Planning Policy Service privacy notice](#). Comments will be able to be viewed by others.

If you need this consultation document in an alternative format, please contact us.



[Have Your Say Today - Introduction - East Hampshire Local Plan \(commonplace.is\)](https://www.commonplace.is)

## Document library

Supporting documents of the Issues & Options consultation are:

- [EHDC climate change and sustainable construction supplementary planning document 2022](#)
- [Technical note: Testing the standard method housing need for East Hampshire](#)
- [EHDC housing and economic needs assessment \(HEDNA\) 2022](#)
- [EHDC gypsy and traveller accommodation assessment 2020](#)
- [EHDC biodiversity and planning guidance 2021](#)
- [EHDC landscape capacity study 2018](#)
- [EHDC green infrastructure strategy 2019](#)
- [EHDC local development scheme 2022](#)
- [Habitats Regulations Assessment Screening 2022](#)
- [Interim SA Scoping Report 2018](#)

Background papers to this Issues & Options consultation can be found [here](#).

Further documents supporting the evidence base of the emerging Local Plan can be viewed [here](#).

Previous Local Plan consultation documents can be viewed [here](#).

## Statutory Requirements

Various regulations cover how a local plan should be prepared and its content.

The [National Planning Policy Framework \(NPPF\)](#) sets out the Government's national policy guidance on planning. The Local Plan must be prepared to be consistent with the NPPF, take account of supporting [Planning Practice Guidance \(PPG\)](#) and be mindful of emerging guidance and potential changes to the planning system.

Part of the legal compliance requirements cover the need for various assessments on sustainability and habitats regulations and the need to demonstrate that the Council has complied with the Duty to Cooperate.

In terms of the sustainability appraisal, strategic environmental assessment and habitats regulation assessment this will be prepared alongside the emerging Local Plan, to show how the options perform and which one is best suited to enable the Local Plan to deliver its vision and objectives. This will help to identify the preferred options that are then incorporated into the Local Plan. A [scoping report](#) has been prepared which provides baseline information on the environmental, social and economic characteristics of the area to be covered by the Local Plan, but this information will be updated to inform future appraisals.

There is also a requirement for Local Planning Authorities (LPA) to engage constructively, actively and on an ongoing basis on certain cross boundary matters with other Councils and organisations – this is known as the Duty to Cooperate. The Council has existing relationships with our neighbouring authorities and this helps us to agree cross boundary issues such as housing numbers and infrastructure provision, these discussions will continue.



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**General Feedback**

**GEN1 How do you feel about this consultation?**



Unhappy



Dissatisfied



Neutral



Satisfied



Happy

Unhappy

Happy

**GEN2 Is there anything else you would like to tell us in response to this consultation?**

Please explain







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## **Commonplace - How to participate and updates**

### **What is Commonplace?**

Commonplace is an online citizen engagement platform. The Council is using this platform as the primary means of enabling responses to this Local Plan consultation.

### **Why should I submit my response via the Commonplace platform?**

For ease of submission, and analysis of data, we encourage you to register and respond using Commonplace.

### **What information can people see about me?**

If you respond using Commonplace and confirm your response, your response will be published on Commonplace. Your name will not be published on Commonplace. If you respond by email or writing to us, your response will be included in the summary feedback produced by the Council following the consultation.

### **Is assistance provided for using Commonplace?**

At the top of the screen, help is available. Use this for any problems logging in, editing responses etc.

### **What emails will I receive?**

Once you are registered with Commonplace, you will receive notifications relevant to this consultation. If you wish to unsubscribe at any time you can do so at the bottom of any of the emails.

To be kept up to date with the East Hampshire Local Plan; news and future consultations, please sign up at our [website](#). You can unsubscribe to this at any time.

### **How is my data processed?**

All submitted representations will be made public and personal information will be removed in accordance with the Council's Planning Policy Service [privacy notice](#). Comments will be able to be viewed by others.



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## EAST HAMPSHIRE LOCAL PLAN 2021-2040

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### **Local Plan**

#### **What is a local plan?**

A Local Plan sets out where new homes, workplaces and other developments should be built to meet the area's future needs, while conserving an area's most valuable environmental and built assets. The Local Plan when adopted will provide policies and guidance on how planning applications are determined.

#### **Why do we need a new Local Plan?**

Government requires all local authorities to provide an up-to-date Local Plan – a vision and framework for the future development of the area that sets out the local needs and opportunities for the District which lies outside the South Downs National Park. This is driven by annual housing requirements set by government; the council must not only meet these, but ensure a five-year housing supply is available in the District. In addition, the Council declared a Climate emergency in 2019 and this provides an opportunity for the Local Plan to reflect where it can matters to address this.

#### **Does the new Local Plan include the South Downs National Park Area?**

No. Following the creation of the South Downs National Park Authority, our Local Plan no longer covers the entire district. Instead, only the three separate parts of East Hampshire District as indicated on the map will be covered by the new Local Plan.

The South Downs National Park creates its own plan for the towns and villages located within its boundaries.





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## **Housing and Development in the District**

### **Who sets the housing target for the District?**

Government set out how many new homes need to be provided in the District through a calculation called the 'standard method'. The Council must take this figure forward and plan for this level of housing. If that cannot be accommodated, an extremely robust evidence base would be needed to demonstrate why that is the case and the Council would need to explore how the shortfall could be provided in neighbouring authorities. Likewise the Council may also be requested to meet others housing needs under the Duty to Cooperate.

### **Why do we need more development in the District?**

East Hampshire District is a beautiful place to live and work and so people are keen to live here, plus people are living longer.

Most importantly, our young people are finding it very difficult to get on the property ladder as first time buyers or renters. Nationally, there's been an increase in the number of 20-34 year olds still living with their parents.

We want those who grow up here to have the option to stay here - and so we need to make sure that there are homes of the right price and type, that will enable them to do this.

Unfortunately, there is limited Government funding available for affordable housing. This is why the Local Plan is so important, because it requires developers to deliver a proportion of affordable homes that are suitable for local families and young people.

We also have an ageing population and the plan will help provide a range of suitable housing to meet people's needs.

### **What about the wider impact of more housing? Won't more roads, public transport, schools and health services be needed?**

Yes. We know that for every new house we build the people living there need health services, transport services, road maintenance, waste collections, and schools for their children. Availability of infrastructure will also inform the choices we need to make in terms of our development strategy that we are seeking views on. We are working with various public services across the district to determine what's needed.

Changes to the planning regime introduced in recent years are designed to address the criticism that infrastructure always lags behind development.

The Community Infrastructure Levy (CIL) enables us to charge developers for new development. This money means that resources will be available to deal with issues that communities raise. Some of this will be paid directly to the communities affected to provide new facilities

### **Are developers prevented from submitting planning applications until the new Local Plan is in place?**

No. Government require a continuous supply of new homes and for a 5 year supply to be maintained. The Council cannot prevent planning applications for new development being submitted.



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### **Will the new Local Plan reflect the Government's Planning White Paper and Levelling up Bill**

At the time of writing, the Government has yet to respond to consultation proposals included in the [Planning for the Future white paper](#) which was published in August 2020. Though it is clear through the [Levelling Up proposals](#) that reform of the planning system remains a priority, it is not yet clear what proposals will be carried forward into changes to National Planning Policy. Any new Local Plan will however need to be informed by any changes to national policy and include an element of flexibility to ensure it is 'sound'.

### **East Hampshire consulted on the Local Plan during 2019 - what's happened to these comments?**

All comments made on the previous consultations have been considered. Together with the latest evidence studies, with Government policy and guidance, these have informed the preparation of the new Local Plan issues and priorities document.

### **Why does this version of the Local Plan not include proposed development sites and planning policies?**

A decision was made to reset the preparation of the Local Plan in May 2022 and consider further early engagement on the matters that are important to East Hampshire. To enable the Council to understand what's important for residents this consultation therefore focuses on key issues and priorities only, establishing these first will allow the Council to then devise a development strategy and set of policies to more accurately reflect community aspirations.

### **When will we know which sites are being considered for development?**

Once this consultation concludes in January 2023, the Council will not only assess the feedback received but will also undertake further technical studies and communication with key infrastructure providers. The outcome of this together with the consultation feedback will inform which development strategy the Local Plan will follow and at that stage the identification of potential sites will be undertaken. The next Local Plan consultation scheduled for autumn 2023 will be a full draft local plan including proposed sites and draft planning policies.

South East & London Area Office  
Bucks Horn Oak  
Farnham  
GU10 4LS

Tel: 0300 067 4420  
planningconsultationSEL@forestrycommission.gov.uk

Area Director

Dear East Hampshire District Council,

### **East Hampshire District Council Local Plan Consultation – Issues and Priorities**

Please note that as a Non-Ministerial Government Department, we provide no opinion supporting or objecting to a local plan or planning application. Rather we are including advice and information to help the Council avoid potential impacts and promote enhancements/expansion as part of the proposed local plan regarding trees and woodland, including ancient woodland, which is an irreplaceable habitat. We hope our advice is helpful to guide the Council to take every opportunity to secure the protection, enhancement and expansion of East Hampshire's valuable trees and woodlands to comply with planning policy, good practice and to make the most of the many benefits they provide to the environment, local economy and community.

#### **Vision**

We welcome the focus on climate emergency and green places to live within the vision. We advise that Local Plan visions should specifically focus on *nature-rich* places as well as green ones, especially where they contain areas within National Parks and their setting, and are host to valuable priority habitat including significant levels of ancient woodland. This is an effective way to help meet the other parts of the local plan vision because nature provides substantial benefits to health and wellbeing, sense of place and as part of tackling the climate emergency.

#### **Development Growth Options**

As the Council acknowledge, we note that it is difficult to give detailed response at this stage as the location of specific sites will play a significant part of whether development is appropriate. We welcome the opportunity to feed into the plan-making process at this early stage when there is opportunity to make the most impact. We offer the following advice to help further appraise the different growth options. We would very much welcome the opportunity to work with the Council to develop local plan policy and growth options that protect and expand our precious trees and woodlands, and to bring more woodlands into active, sustainable management.

#### **Overarching comments**

Ancient woodlands, veteran and ancient trees are **irreplaceable habitats**, and it is essential that they are considered appropriately to avoid any direct or indirect effects that could cause their loss or deterioration, in line with [Government Standing Advice](#). Ancient Woodland has very high potential ecological value and should act as integral focal points, alongside other locally and nationally designated sites, as part of delivering landscape-scale nature recovery.

Any development or plan that include these irreplaceable habitats on or near to the site should aim to deliver high standards of net gains and ecological connectivity that supports wider ecological networks, in line with good practice. This will be a requirement as part of the local nature recovery strategies being driven by the Environment Act 2021 and we highly recommend that plans anticipate this to maximise environmental benefits to contribute to reversing the national trend of ecological decline as part of broader nature recovery networks.

The Local Plan should be considered as a crucial and timely opportunity to secure significant and strategic, plan-led environmental gains due to their scope and scale, particularly given the timescales of development being influenced that coincide with UK Government commitments regarding halving emissions and protecting 30% of nature by 2030, towards a net-zero carbon and nature positive economy. With this in mind, we very much welcome the Council's proactive consideration of 'green sites' and advise that sites should be prioritised that are suitable for woodland creation to connect and expand woodlands, particularly where development is close to existing woodland, which should be bolstered with significant buffers.

We encourage development options that prioritise the protection of trees and woodlands with the highest priority being given to ancient woodland, ancient and veteran trees as individual habitats and as part of wider ecological networks. We note that the Council has not identified any of the 4 growth options as being likely to be good for both avoiding impact on the most important wildlife sites, and for avoiding impacts on the character of the rural landscapes within the planning area, of which trees and woodlands are a significant part. We also question the Council's assertion within the consultation that some growth options could be good for avoiding impacts on the most important wildlife habitats where they propose development focus in areas near priority woodland habitat and ancient woodland.

We therefore urge the Council to exhaust all alternative growth options to protect the most important wildlife sites and landscape character as far as possible. The expected negative impacts on wildlife from growth options that is expected by the Council highlights the importance of considering wildlife and landscape as high priorities when assessing suitability of sites for development. Strong policies should be required to protect valuable wildlife sites on every site allocation where it is relevant, to ensure impacts are avoided/mitigated at the plan-level.

We advise that local plan policy should include the following focus on trees and woodlands (not an exhaustive list):

- Ensure all development is consistent with the Government's standing advice for Ancient Woodlands, and Veteran and Ancient Trees: <https://www.gov.uk/guidance/ancient-woodland-ancient-trees-and-veteran-trees-advice-for-making-planning-decisions>
- Ensure that development containing or close to trees, hedgerows and woodlands are sensitively designed to avoid impacts as far as possible
- Tree/hedgerow removal should be a last resort. Where removal is justified, we advise that developments should deliver no-net deforestation to help encourage development that provides an overall environmental gain. If where trees are required to be removed, additional tree planting will be made to compensate for this loss on-site as far as possible and we would advise that additional planting should be made to help compensate for the loss of habitat in the time it takes for new trees to mature.
- Long term management and maintenance of planted trees and woodland creation to give them every chance to becoming established and where trees do fail, they are replaced
- Consider minimum standards for tree canopy cover (e.g. a percentage) for new development to ensure a targetable level of green infrastructure is being met in relation to trees for the numerous ecosystem services they provide
- We advise that any tree planting should meet the following:
  - Trees should be healthy and good practice biosecurity should be followed to prevent the risk of spreading pests and disease, in line with Government advice:

<https://www.gov.uk/government/collections/tree-pests-and-diseases>. More information on the plant healthy can be found at: [Welcome to Plant Healthy - Plant Healthy](#)

- Created or restored habitat should be managed in perpetuity in line with a robust management plan that follows good practice to ensure assumed benefits of created habitats are delivered in practice (see Standing Advice referred to on page 1). We recommend meeting the UK Forestry Standard to demonstrate this.
- Precautions should be incorporated into any woodland design and tree planting at risk of deer impacts to ensure that habitat creation is established successfully and that potential impacts from deer are managed on site and in the surrounding area as appropriate. See here for further guidance that should be followed for managing impacts from deer as part of woodland creation and tree planting: <https://www.gov.uk/government/publications/woodland-creation-and-mitigating-the-impacts-of-deer/woodland-creation-and-mitigating-the-impacts-of-deer> Some good practice advice is also provided in Appendix 1 of this letter.
- To help mitigate climate and support local economy, we suggest that the Council explore and develop local plan policy that makes use of locally sourced timber. This has multiple benefits as it can help store carbon within development, reduce impact from transportation, reduce embodied carbon from alternative materials and support local economies and communities. This is particularly important as part of the Local Plan's vision to positively tackle the climate emergency and considering that any increase in growth will inevitably linked with increased emissions for the District.
- Where developments incorporate District Heating, consider locally and sustainably sourced wood-fuels for the benefits this can have for renewable energy and towards a local, circular economy
- Use tree planting as part of nature based solutions for managing flood risk as well as other multi-functional benefits from green infrastructure as part of any development (e.g. [Trees and woodlands provide £400 million of value in flood protection](#))
- We encourage the Council to develop/refine their strategy to trees and woodlands using the recently launched 'Trees and Woodland Strategy Toolkit' available here: <https://treecouncil.org.uk/what-we-do/science-and-research/tree-strategies/> to design and deliver a local tree strategy to harness the long-term benefits that trees can bring to local communities. The local plan should be developed with tree/woodlands in mind as an integral part, alongside other supplementary strategies for the environment including biodiversity, green infrastructure, nature recovery and climate change.

### **Specific Comments**

- Development options should avoid impacts on Ancient Woodland as a high priority by focussing development away from these areas, especially where they are close to other designated areas such as the Southdowns National Park where trees and woodlands are an important landscape feature and priority (e.g. see the initiative [Trees for the Downs](#) to plant 100,000 trees). Where development is in close proximity, it should be in line with the Government Standing Advice and high levels of protection from local plan policy, as advised in our Overarching Comments, above. For example, Growth options 1 and 2 emphasise that more development is likely around the areas of Alton, Horndean, Catherington and Rowlands Castle, where there are significant areas of Ancient Woodland and priority woodland habitat. Development should be avoided where it could impact this irreplaceable habitat. Any development proposals should also be appraised in the context of simultaneous large developments including the Havant Thicket Reservoir NSIP which involves substantial levels of ancient woodland loss, making any further impacts to this highly valuable habitat more significant and a priority to avoid.

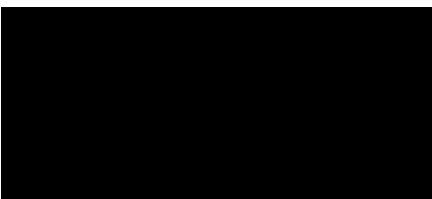
Where development is appropriate, it should be of a sensitive design and scale to protect, enhance and expand nearby wildlife sites. This should include consideration of increased recreational pressure from major development that can have an adverse effect on ancient woodland (e.g. as a result of soil compaction/erosion, contamination etc). We advise that local plan environmental assessments including the Sustainability Appraisal should consider these impacts and ensure

adequate mitigation is in place to avoid adverse effects. For example, this could include a SANG-type model used for sites designated as Special Protection Areas, with attractive green space on or near sites allocated for developments that diverts occupants away from nearby Ancient Woodland sites.

- We advise that the development strategy and site allocations should avoid pressure on sites of ecological value throughout the district. Where they are in close proximity, development strategies should contain suitable buffers and aim to contribute improvements to habitat creation and enhancement to support nature recovery and improve ecological connectivity. For example, Growth Options 1 and 2 suggest that some development is possible in the Grayshott area. The Bramshott and Ludshott Commons SSSI which includes priority woodland habitat, is located to the West of this area, so any development in this area should be an appropriate design and scale to protect and enhance the site, and the surrounding area.
- Much of the development focus areas are close to the boundary of the National Park, given where existing settlements are located. Where development is within the National Park's setting, it should be landscape-led and in line with the [SDNP Partnership Management Plan](#)
- Growth Option 4: New Settlement: The uncertainty regarding the scale and location of a freestanding development makes it difficult to have a conclusive view. However, in principle, it is normally favourable to sensitively integrate development using existing infrastructure and developed land as far as possible. This is unlikely to be feasible for this option and we advise that alternative options would need to be exhausted before a freestanding settlement of this scale could be justified. If large-scale development associated with this type of growth scenario were to be considered further, we would encourage it to be an exemplar of garden village principles with very high standards of environmental gains would be appropriate across multiple sustainability topics to provide high levels of mitigation and compensation, and to maximise opportunities to design coordinated environmental benefits such as green infrastructure and enhanced ecological networks.

We hope our advice is helpful and would welcome the opportunity to work with the Council to help define its policy to support trees and woodlands as an integral part of the Local Plan to help achieve its vision.

Yours sincerely,



South East and London Forestry Commission



## Additional Advice

### Appendix 1: Forestry Commission Guidance

**Ancient woodlands are irreplaceable.** They have great value because they have a long history of woodland cover.

It is Government policy to refuse development that will result in the loss or deterioration of irreplaceable habitats including ancient woodland, unless “*there are wholly exceptional reasons<sup>1</sup> and a suitable compensation strategy exists*” (National Planning Policy Framework paragraph 180).

One of the most important features of Ancient woodlands is the quality and inherent biodiversity of the soil; they being relatively undisturbed physically or chemically. This applies both to Ancient Semi Natural Woodland (ASNW) and Plantations on Ancient Woodland Sites (PAWS). Direct effects of development can cause the loss or deterioration of ancient woodland or ancient and veteran trees by:

- damaging or destroying all or part of them (including their soils, ground flora or fungi)
- damaging roots and understorey (all the vegetation under the taller trees)
- damaging or compacting soil
- damaging functional habitat connections, such as open habitats between the trees in wood pasture and parkland
- increasing levels of air and light pollution, noise and vibration
- changing the water table or drainage
- damaging archaeological features or heritage assets
- changing the woodland ecosystem by removing the woodland edge or thinning trees - causing greater wind damage and soil loss

Indirect effects of development can also cause the loss or deterioration of ancient woodland, ancient and veteran trees by:

- breaking up or destroying working connections between woodlands, or ancient trees or veteran trees - affecting protected species, such as bats or wood-decay insects
- reducing the amount of semi-natural habitats next to ancient woodland that provide important dispersal and feeding habitat for woodland species
- reducing the resilience of the woodland or trees and making them more vulnerable to change
- increasing the amount of dust, light, water, air and soil pollution
- increasing disturbance to wildlife, such as noise from additional people and traffic

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<sup>1</sup> For example, infrastructure projects (including nationally significant infrastructure projects, orders under the Transport and Works Act and hybrid bills), where the public benefit would clearly outweigh the loss or deterioration of habitat.)

- increasing damage to habitat, for example trampling of plants and erosion of soil by people accessing the woodland or tree root protection areas
- increasing damaging activities like fly-tipping and the impact of domestic pets
- increasing the risk of damage to people and property by falling branches or trees requiring tree management that could cause habitat deterioration
- changing the landscape character of the area

It is therefore essential that the ancient woodland is considered appropriately to avoid the above impacts, including suitable buffer zones between activity and the ancient woodland.

[Planning Practice Guidance](#) emphasises: *'Their existing condition is not something that ought to affect the local planning authority's consideration of such proposals (and it should be borne in mind that woodland condition can usually be improved with good management).'*

**If this application is adjacent to or impacting the Public Forest Estate (PFE):**

- Please note that the application has been made in relation to land near the Public Forest Estate and [Forestry England](#), who manage the PFE, is a party to the application. They therefore should also be consulted separately to the Forestry Commission.

If the planning authority takes the decision to approve this application, we may be able to give further support in developing appropriate conditions and legal agreements in relation to woodland management mitigation or compensation measures. Please note however that the Standing Advice states that *"Ancient woodland, ancient trees and veteran trees are irreplaceable. Consequently you should not consider proposed compensation measures as part of your assessment of the merits of the development proposal"*.

We suggest that you take regard of any points provided by Natural England about the biodiversity of the woodland.

**Deer Management**

We offer the following general guidance which we hope is helpful:

- Fences should be considered if woodland habitat and tree planting is being targeted. Fences can be breached so some provision should be made for removing deer from fenced areas in their interest of deer welfare and preventing tree damage
- Woodlands should be designed to accommodate deer management now and into the future. If fencing is being installed to protect woodland from deer, deer should still be managed on adjacent land in the event that fences are breached, decay or are taken down
- Tree guards and tubes are important for protecting trees. In addition, deer management is needed to realistically achieve woodland habitat if deer are present (for example for woodland flora)
- Deterrents for deer are as yet unproven and tend to be less effective if deer numbers are high

- Brash piles/fences and alternative feed are not likely to be effective if deer density is very low.

### **Further Guidance**

[Felling Licences](#) - Under the Forestry Act (1967) a Felling Licence is required for felling more than 5 cubic metres per calendar quarter. Failure to obtain a Licence may lead to prosecution and the issue of a restocking notice.

[Environmental Impact Assessment](#) - Under the Environmental Impact Assessment (Forestry) (England and Wales) Regulations 1999, as amended, deforestation which is likely to have a significant impact on the environment may also require formal consent from the Forestry Commission.

### **Information Tools – The Ancient Woodland Inventory**

This is described as provisional because new information may become available that shows that woods not on the inventory are likely to be ancient or, occasionally, vice versa. In addition ancient woods less than two hectares or open woodland such as ancient wood-pasture sites were generally not included on the inventories. For more technical detail see [Natural England's Ancient Woodland Inventory](#). Inspection may determine that other areas qualify.

As an example of further information becoming available, Wealden District Council, in partnership with the Forestry Commission, Countryside Agency, the Woodland Trust and the High Weald AONB revised the inventory in their district, including areas under 2ha. Some other local authorities have taken this approach.

## Appendix 2: A summary of Government policy on ancient woodland A summary of Government policy on ancient woodland

[National Planning Policy Framework](#) (published 2021).

**Paragraph 180** – “development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists”.

[National Planning Practice Guidance](#) – Natural Environment Guidance. (Published March 2014)  
This Guidance supports the implementation and interpretation of the National Planning Policy Framework. This section outlines the Forestry Commission’s role as a **non-statutory consultee** on “development proposals that contain or are likely to affect Ancient Semi-Natural woodlands or Plantations on Ancient Woodlands Sites (PAWS) (as defined and recorded in [Natural England’s Ancient Woodland inventory](#)), including proposals where any part of the development site is within 500 metres of an ancient semi-natural woodland or ancient replanted woodland, and where the development would involve erecting new buildings, or extending the footprint of existing buildings”

It notes that **ancient woodland is an irreplaceable habitat**, and that, in planning decisions, **Plantations on Ancient Woodland Sites (PAWS) should be treated equally in terms of the protection afforded to ancient woodland in the National Planning Policy Framework**. It highlights the Ancient Woodland Inventory as a way to find out if a woodland is ancient.

[Standing Advice for Ancient Woodland and Veteran Trees](#) (published October 2014, updated January 2022)

The Forestry Commission has prepared joint [standing advice](#) with Natural England on ancient woodland and veteran trees which we refer you to in the first instance. This advice is a material consideration for planning decisions across England. It explains the definition of ancient woodland, its importance, ways to identify it and the policies that relevant to it. It also provides advice on how to protect ancient woodland when dealing with planning applications that may affect ancient woodland. It also considers ancient wood-pasture and veteran trees.

The Standing Advice website will provide you with links to [Natural England’s Ancient Woodland Inventory](#), **assessment guides** and other tools to assist you in assessing potential impacts. The assessment guides sets out a series of questions to help planners assess the impact of the proposed development on the ancient woodland. **Case Decisions** demonstrates how certain previous planning decisions have taken planning policy into account when considering the impact of proposed developments on ancient woodland. These documents can be found on our [website](#).

[Natural Environment and Rural Communities Act 2006](#) (published October 2006).

**Section 40** – “Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity”.

[The UK Forestry Standard](#) (published December 2017, updated June 2021).

**Page 24** “Areas of woodland are material considerations in the planning process and may be protected in local authority Area Plans. These plans pay particular attention to woods listed on the Ancient Woodland Inventory and areas identified as Sites of Local Nature Conservation Importance (SLNCIs).

[Keepers of Time](#) – A Statement of Policy for England’s Ancient and Native Woodland (published June 2005 updated May 2022).

**Page 18** “Our main priority is to protect ancient woodland, and ancient and veteran trees from the threats listed in this policy document. We must also recognise the value of long established woodland and consider options to provide greater protection to these habitats from development.”

[Natural Environment White Paper “The Natural Choice”](#) (published June 2011)

**Paragraph 2.53** - This has a “renewed commitment to conserving and restoring ancient woodlands”.

**Paragraph 2.56** – “The Government is committed to providing appropriate protection to ancient woodlands and to more restoration of plantations on ancient woodland sites”.

[Biodiversity 2020: a strategy for England’s wildlife and ecosystem services](#) (published August 2011).

**Paragraph 2.16** - Further commitments to protect ancient woodland and to continue restoration of Plantations on Ancient Woodland Sites (PAWS).

### **Renewable & low carbon energy**

The resilience of existing and new woodland is a key theme of the Forestry Commission’s work to Protect, Improve and Expand woodland in England we will continue to work with Forestry / Woodland owners, agents, contractors and other Stakeholders to highlight and identify, pests and diseases and to work in partnership to enable Woodlands and Forests are resilient to the impacts of Climate Change.

Woodfuel and timber supplies continues to be an opportunity for local market growth whilst also enabling woodlands to be brought back into active management.

### **Flood risk**

The planting of new riparian and floodplain woodland, can help to reduce diffuse pollution, protect river morphology, moderate stream temperature and aid flood risk management, as well as meet Biodiversity Action Plan targets for the restoration and expansion of wet woodland. The Forestry Commission is keen to work in partnership with Woodland / Forest Stakeholders to develop opportunities for woodland creation to deliver these objectives highlighted above.

In the wider planning context the Forestry Commission encourages local planning groups to consider [the role of trees in delivering planning objectives](#) as part of a wider integrated landscape approach. For instance through:

- the inclusion of [green infrastructure](#) (including trees and woodland) in and around new development; and
- the use of locally sourced wood in construction and as a sustainable, carbon lean fuel.

## **Appendix 3: Importance and Designation of Ancient and Native Woodland**

### **Ancient Semi Natural Woodland (ASNW)**

Woodland composed of mainly native trees and shrubs derived from natural seedfall or coppice rather than from planting, and known to be continuously present on the site since at least AD 1600. Ancient Woodland sites are shown on Natural England's Inventory of Ancient Woodland.

### **Plantations on Ancient Woodland Site (PAWS)**

Woodlands derived from past planting, but on sites known to be continuously wooded in one form or another since at least AD 1600. They can be replanted with conifer and broadleaved trees and can retain ancient woodland features, such as undisturbed soil, ground flora and fungi. Very old PAWS composed of native species can have characteristics of ASNW. Ancient Woodland sites (including PAWS) are on Natural England's Inventory of Ancient Woodland.

### **Other Semi-Natural Woodland (OSNW)**

Woodland which has arisen since AD 1600, is derived from natural seedfall or planting and consists of at least 80% locally native trees and shrubs (i.e., species historically found in England that would arise naturally on the site). Sometimes known as 'recent semi-natural woodland'.

Other woodlands may have developed considerable ecological value, especially if they have been established on cultivated land or been present for many decades.

**FOUR MARKS PARISH COUNCIL**

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13<sup>th</sup> January 2023

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

Dear Sir

**Response of Four Marks Parish Council, being a constituent part of the Medstead and Four Marks Steering Group (NPSG) to the East Hampshire District Council's document entitled "ISSUES AND PRIORITIES REGULATION – PART 1"**

Four Marks Parish Council ('the Council') is pleased to have the opportunity to contribute to this consultation. As many of the issues raised are necessarily complex, the Council has chosen to respond by way of this letter in addition to completing the on-line survey.

In the main, the Council supports the proposals in the "ISSUES AND PRIORITIES REGULATION – PART 1" document. The Council support the emphasis and priority that the District Council has given to policies to mitigate the impact of climate change and improve the quality of our local environment.

The Council also understands that EHDC are not reconsulting on many of the topics or sites previously considered in 2019 and that the information and opinions that were shared with EHDC at that time remain part of the preparation of this Local Plan and are not lost. The Council would ask that note is taken of the following three documents that the NPSG have previously submitted:

- i) The NPSG response to the EHDC Settlement Policy Boundary Review Draft Methodology – June 2017
- ii) The NPSG response to the EHDC Draft Local Plan consultation – March 2019.
- iii) The NPSG response to the EHDC consultation on the 10 Large Sites – October 2019.

However, there are several important issues raised by the "ISSUES AND PRIORITIES REGULATION – PART 1" document that the Council would like to comment on. These are as follows:

- i) The Quantum of Housing
- ii) The Affordability Ratio
- iii) The Four Options
- iv) Affordable Housing
- v) Settlement Hierarchy
- vi) Brownfield

## **1. THE QUANTUM OF HOUSING**

The Council is concerned that the target for new houses specified in the document does not reflect the real, current need of the district and has been set at an unnecessarily high level under the current Standard Calculation.

We believe that further consideration should be given to the following issues:

- i) The national park covers 57% of the district but currently takes a fraction (just one sixth) of the JCS Local Plan's allocated homes.

The Council fully supports the statement made by the Leader of East Hampshire District Council when he said (in the article in the Alton Herald of 15 December 2022),

*"It has long been our opinion the government method to calculate housing figures is inadequate and unfair for areas like East Hampshire. This is especially when you consider our relationship with the South Downs National Park. The national park covers 57% of the district but takes a fraction of the allocated homes."*

- ii) The current housing requirement for each local authority is based on out-dated information – the 2014 household projections. Furthermore, those were based on the 2011 census. Now that the 2021 census data is available, we recommend that the future housing needs for the next 15 years should be based on the most up-to-date data.
- iii) This consultation is premature in view of the letter of 5 December 2022 from DLUHC to all MPs. The housing targets have always been the starting point for local plans and this letter indicated a move to "advisory" housing targets and allowing departures for exceptional circumstances. The change from mandatory to advisory housing targets, as set out in the DLUHC letter, means that this consultation is effectively out of date as regards housing numbers as the official numbers will become only the starting point. It seems that departures from this starting point will be permitted at Examination if to take account of factors such as local constraints, the character of the local plan area and concerns of the local community.

The Council recommends that both the total numbers for the District and the split between the National Park and the LPA are reviewed and are the starting point before any strategic delivery options can be considered and decisions made. Therefore, EHDC should follow the example of other LPAs and wait for government clarification of changes to the NPPF and especially how the LDP 15 year housing target will be derived going forward.

## **2. THE AFFORDABILITY RATIO**

The Affordability Ratio is one of the key aspects of the Standard Method of calculating housing need that the Council believes to be 'unfair'. According to the HEDNA, the target for housing in East Hampshire needs to be increased by 66% over and above the projected need of the inhabitants of East Hampshire. We believe that that is an unjustifiable burden on the residents.

The Council also believes that the fundamental rationale for the Affordability Ratio is flawed. The rationale put forward is that a significant increase in the supply of housing will lead to a material reduction in the price of housing, making housing more affordable to the many residents who are currently priced out of the market.

The Council can find no evidence to support this thesis. In fact, the data suggests the opposite. According to the census data, over the last 10 years, the number of households in East Hampshire grew by over 11%. During this time, the number of households in Four Marks/South Medstead grew by over 25%. In neither area is there any evidence that this increase led to a reduction in house prices. Indeed, the data suggest the opposite. In the same period, house prices in the GU 34 area, have gone **up** by over 30%.



There are several reasons as to why the market may have responded in a way that is diametrically opposite from the one that was posited. Two of them are highlighted below:

- i) The Affordability Ratio has a built in incentive for developers to build more expensive houses. The algorithm used means that the more houses that are built above the median house price the greater the number of houses that the LPA is required to get built.
- ii) These houses are attractive to those who want to move out of London. For those who have sold at London prices, this is an attractive opportunity to move to the countryside. This then prices local residents out of the market.

Regarding the detail of the calculation of the Affordability Ratio, the Council are also concerned about the data set that has been used to generate the figure of 14.51%. An analysis of the data included in the HEDNA suggests that

- Some of the trends implied by the data are unreliable
- The actual Affordability Ratio could be as low as 9.8%.

This is very significant, because a re-assessment of the Affordability Ratio could lead to a reduction of 112 dwellings pa or 1680 across the period of the Plan.

The Council recommends that the whole data set for the Affordability Ratio is subject to a rigorous review before any strategic options are considered.

### **3. AFFORDABLE HOUSING**

The Council recommends that the debate about Affordable Housing should be re-framed. It should be based on the principle of what people can afford. In other words, it should start with an analysis of what people earn – rather than being based on a discount from the market price. The Council welcomes the recent EHDC ambition and statements on real affordability, see [Bringing affordable homes to East Hampshire / East Hampshire District Council \(easthants.gov.uk\)](http://www.easthants.gov.uk), rather than the governments national 20% discount off market price. This is essential to meet the needs of the key groups - young couples; keyworkers; those in poor quality housing; and the retired.

The proposed new approach would define homes as affordable:

- For owners: if homes were priced no more than 4.5 times the median earnings for a couple in the district
- For renters: if the rent was no more than 35% of net household income

Policies should be designed to differentiate between ownership and renting.

- i) Ownership: the policy should be based on what can be afforded in terms of a mortgage. The calculation above indicates a figure of less than £300,000.
- ii) Private Rented: there is a need in East Hampshire for more rented housing. The policy should be based on earnings
- iii) Social rented housing: there is an urgent need in East Hampshire for more social rented housing. It is important to address the housing needs of the people who already live in the district but suffer from inadequate housing. This is a major issue and should be the focus of several policy initiatives.

### **4. THE FOUR OPTIONS**

The document entitled '*ISSUES AND PRIORITIES REGULATION – PART 1*' puts forward four different options for the distribution of new housing and asks the public to put them in the order of priority.

The Council does not believe that any of the options are the optimum approach for the distribution of new housing in East Hampshire, whatever the final 15 year Housing Market may be. The Council's recommendation is that at least one alternative option should be considered. This Option 5 would focus on the key demographic trends in East Hampshire which confirm the need for smaller, low cost accommodation.

**Option 5: Focus new development on providing smaller, low cost accommodation to meet the needs highlighted by the demographic trends**

There are important demographic trends forecast for East Hampshire (c.f. the HEDNA) which confirm the need for smaller, low cost accommodation. The main areas of need are:

- For the ageing population
- Young people trying to get on to the housing ladder
- Those with no or low quality housing
- Keyworkers on low wages

**a) The Ageing population**

This is the most significant trend identified in the HEDNA. As Table 6.12 shows, 66% of the forecast growth in population in East Hampshire will come from the population of '65 and over'

**Table 6.12 Population change 2021 to 2038 by broad age bands – East Hampshire (linked to delivery of 632 homes per annum)**

Age Group	2021	2038	Change in population	% change from 2021
Under 16	22,288	23,990	1,702	7.60%
16-64	72,234	77,059	4,825	6.70%
65 and over	29,956	42,990	13,034	43.50%
Total	124,478	144,038	19,560	15.70%

It is also noticeable that the forecast increase in the population of '65 and over' is 13,034. Assuming that the average members of these households will be 3 or less that indicates a need for 4344 homes. This suggests that most (if not all) the new housing in the Local Plan should be built for this group.

This group is not homogeneous. As it represents such a large percentage of the forecast growth, it is important that policies are designed for each of the component parts

- The fit and healthy (who want to down-size)
- Those that wish to move to a community for senior citizens
- Care homes
- Nursing homes.

**b) Young people trying to get on to the housing ladder**

The HEDNA does not split out the increase in population for this group, but it is well known that there is a significant number of young people who cannot buy a home because they are generally far too expensive.

Many people in this category will be looking to buy a property at or below the maximum that they can secure for a mortgage based on median earnings. As discussed above this is likely to be under £300,000.

The HEDNA does highlight that some categories of market homes do meet these criteria. As can be seen from Table 2.2 below both flats and terraced houses are generally available at this more affordable level, and "in character" of this type should be encouraged.

**Table 2.2 Median House Prices, 2021**

	Detached	Semi	Terraced	Flat	All Sales
East Hampshire	£575,000	£376,750	£295,000	£207,500	£412,500
South East	£539,950	£359,950	£290,000	£210,000	£360,000
Differential	£35,050	£16,800	£5,000	-£2,500	£52,500
England	£385,000	£243,500	£215,000	£230,000	£274,000
Differential	£190,000	£133,250	£80,000	-£22,500	£138,500

*Source: Icen Analysis of ONS Small Area House Price Statistics, Year Ending March 2021*

**c) Those with no or low quality housing**

The data shown in the Affordable Housing Strategy indicates that Hampshire Homes Register calculate that there is a need for 1640 homes for people on their register. The data shows that over 80% of the need is for 1 or 2 bedroom accommodation.

The District Council has identified over 600 parcels of land in its ownership. Most are small and unsuitable for development, however, some warrant further investigation into their development potential. As stated in the Strategy, the distribution of new housing in the Local Plan should be based on feasibility studies undertaken to establish which of these have the greatest potential for affordable housing development.

The Local Plan should also include policies for all relevant forms of tenure with particular emphasis on Social Rented Housing.

**d) Keyworkers**

There are many keyworkers who live in the District who have difficulty in accessing affordable housing.

There is a real and urgent need to provide affordable opportunities to this group of people either to purchase, equity share, or rent at an affordable price.

**The Council therefore recommends that in reviewing the strategy for the distribution of new housing consideration be given to Option 5.**

This would focus on delivering new housing to meet the critical needs of these groups who form the community's housing need, rather than a high margin demand for yet more commuter executive homes for those moving out of cities and large towns.

Whilst these are very disparate groups, they tend to have one thing in common – they have a need for smaller, lower cost accommodation.

The Council therefore recommends that the policies in the Local Plan on the distribution of housing should cover all nature of tenures (include Social Rent; Affordable Rent; Intermediate Rent; Shared Ownership; Shared equity and Rent to Buy) and focus on delivering dwellings that are

- 1-2 bedroom
- Terraced
- Flats
- At a price that someone on median earnings can secure a mortgage for.
- At a rent that is no more than 35% of their net earnings

In terms of the location of the new housing, these groups would clearly benefit from living in existing urban areas where they would have ready access to all the facilities that they will require to meet their everyday needs.

## **5. SETTLEMENT HIERARCHY/THE 20 min NEIGHBOURHOOD**

Option 1 (for the distribution of new housing) of the Issues and Priorities document recommends a new settlement hierarchy based on the concept of a 20 Minute Neighbourhood as described in the Settlement Hierarchy Background paper published by EHDC for the purposes of Local Plan Regulation 18 Consultation, November 2022 - January 2023.

The Council finds the principle of a 20 Minute Neighbourhood appealing and it is currently a popular concept in the Planning trade press/websites and for several LPAs and communities. However, the focus of the 20 Minute Neighbourhood concept has been in larger, urban locations, not semi-rural villages the size of Four Marks/'South Medstead'.

Therefore, the Council does not believe that it would be practical in Four Marks/South Medstead for the following reasons:

- a) The Settlement Hierarchy paper acknowledges that the 20 Min Neighbourhood is impractical and extends the concept to a 30 Minute Neighbourhood.
- b) The paper acknowledges that Four Marks/ South Medstead is an 'anomaly' and does not even 'fit' a 30 Min Neighbourhood.
- c) The proposed 30-minute round trip is calculated based on 'how the crow flies'. In FM/SM this does not reflect the physical layout and therefore real timescales.
- d) Most of the main daily activities (defined by the TCPA) do not take place within the settlement
- e) There is very little evidence that 20 Min Neighbourhood will be practical in a rural area.
- f) Any consideration of the most relevant distance must consider the aging population
- g) Significant 'behaviour change' needs to be well established for this concept to succeed.
- h) There is a risk that the approach increases house prices.
- i) The data in Appendix D is only a snapshot in time.
- j) The data in the evidence base contains a significant number of factual errors
- k) The methodology used for Appendix D significantly distorts the key conclusions

Further details supporting these points are included in Appendix 1.

## **6. BROWNFIELD**

Government policy is to give priority to 'brownfield sites'. As the Minister of State for DLUCH states in his Written Statement of 6 December 2022

*"The new Infrastructure Levy will be set locally by local planning authorities. They will be able to set different Levy rates in different areas, for example lower rates on brownfield over greenfield to increase the potential for brownfield development. That will allow them to reflect national policy, which delivers our brownfield first pledge by giving substantial weight to the value of using brownfield land."*

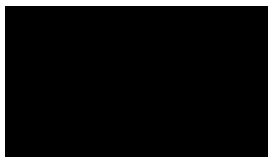
The Council recommends that the distribution of new housing should start with a full and proper assessment of all the brownfield sites in the district, to update the existing incomplete Brownfield Register.

## **7. COMMUNITY FACILITIES STUDY SEPTEMBER 2022**

The Council notes that in paragraphs 7.14 – 7.17 that the proposed new Community Building and Recreational Hub is included. This cannot be considered as a community asset as the proposal has not yet

been granted planning permission and is unlikely to be built in the next two to three years, and request that it is removed or reference changed to 'proposed'.

Yours faithfully,



**On behalf of Four Marks Parish Council**

## Appendix 1

### THE SETTLEMENT HIERARCHY

The comments below relate to the Settlement Hierarchy Background paper published by EHDC for the purposes of Local Plan Regulation 18 Consultation, November 2022 - January 2023. That paper forms the basis for the new settlement hierarchy that is proposed in support of the recommendations in Option 1.

#### i) The Principle

In the ISSUES AND PRIORITIES REGULATION – PART 1 21 November 2022 - 16 January 2023 document (I&P) it states (on Page 19) that

*“The Council’s declaration of a climate emergency puts renewed emphasis on reducing travel distances and increasing opportunities for walking and cycling as a means of transport. Whilst the increased use of electric vehicles will help to lower emissions, the truth is that there are still greenhouse gases associated with their use and production. The challenge of meeting net-zero emissions is also a challenge to walk and cycle more frequently to access local destinations.*

*For this reason, we have produced a new settlement hierarchy for the emerging Local Plan that emphasises accessibility on foot and by bike, to enable people to live more locally in the future. Further information on “living locally” is provided in the settlement hierarchy and climate change background papers, but in summary living locally picks up on some of the key ideas from “20-minute neighbourhoods”:*

The Council welcomes the emphasis on addressing climate change and, in principle, support the concept of a ‘20 minute neighbourhood’.

As it states in the TCPA document, the benefits of the ‘20 minute neighbourhood’ approach are multiple: *“people become more active, improving their mental and physical health; traffic is reduced, and air quality improved; local shops and businesses thrive; and people see more of their neighbours, strengthening community bonds.”*

These are benefits that all communities would welcome. However, the Council have some major reservations about the new settlement hierarchy that is based on the concept of the 20 min neighbourhood.

#### ii) Implementation is impractical in Four Marks/South Medstead

The Council believe that a 20min neighbourhood would be impractical in Four Marks/South Medstead

##### a) The paper acknowledges that the 20 min neighbourhood is impractical and extends the concept to a 30 minute neighbourhood.

The Settlement Hierarchy paper (at 3.3) states that:

*“Initially, a 20-minute neighbourhood area based on 800m distances – this being a 20-minute round trip on foot – was investigated, but this was found to exclude many residential areas within the larger settlements..... As such, a compromise position of using 1,200m distances to define a 20-minute neighbourhood has been applied.”*

There is no evidence base to support an approach based on 1,200m i.e., a 30 minute neighbourhood. This is confirmed by the Olsen paper referred to above:

*“There was little benefit in increasing the 10-min walking distance to 15-min for improving access to a range of facilities and amenities in rural areas”*

##### b) The paper acknowledges that Four Marks/ South Medstead is an ‘anomaly’ and does not even ‘fit’ a 30 min neighbourhood.

At 4.2 and 4.3 the paper highlights that Four Marks/South Medstead does not fit the template *“application of the ‘20-minute neighbourhood area’ for Four Marks and South Medstead was unusual..... The Four Marks & South Medstead anomaly has the potential to skew the results by failing to adequately represent potential accessibility to services”*

**c) The 30 minute round trip is calculated on the basis of ‘how the crow flies’. In FM/SM this does not reflect the real timescales.**

Four Marks and South Medstead is a linear settlement along two miles of the A31, with a major barrier to mobility - the historic “Watercress” railway line crossed by single carriage-way vehicle bridges in two locations at either end of the settlement with dangerous narrow pedestrian walkways, and a pedestrian bridge at Medstead & Four Marks station.

The NPSG carried out a project to assess the real time taken to walk between key points within the settlement and can confirm that very few of them can be completed within the proposed 30mn round trip.

**d) Most of the main daily activities (defined by the TCPA) cannot take place within a 20 min or 30 min neighbourhood.**

As the TCPA document makes clear, the concept will only work when the main daily activities are within the 20 minute range. They highlight “six essential social functions as crucial to sustaining a high quality of urban life: living, working, commerce, healthcare, education, and entertainment.”

This would only be possible in the Tier 1 settlements. For Four Marks/South Medstead most of these ‘main daily activities’ take place well outside the 30 min neighbourhood.

- Working: a recent survey shows that 75% of residents commute out of the settlement for their work
- Shopping: a recent survey shows that 58% of residents travel outside FM/SM for the shopping 1-3 days per week. One reason for this is that the cost of goods bought in Alton are significantly cheaper than those in Four Marks. A recent survey has confirmed that on a range of 8 branded grocery products a leading supermarket in Alton was over 10% cheaper than one of the major convenience stores in Four Marks. Additionally, the price petrol bought at supermarkets in Alton makes the trip attractive.
- Secondary schools: there are no secondary schools in Four Marks/South Medstead
- Primary schools: the primary school in Four Marks is on the extreme edge of the settlement. The primary school in Medstead is not in the settlement of Four Marks/South Medstead.
- Entertainment: There is no theatre, cinema, or pub in Four Marks/South Medstead.

**e) There is very little evidence that 20 min Neighbourhood will be practical in a rural area.**

(c.f. Nationwide equity assessment of the 20-min neighbourhood in the Scottish context: A socio-spatial proximity analysis of residential locations Jonathan R. Olsen, Lukar Thornton, Grant Tregonning, Richard Mitchell)<sup>1</sup>

**f) Any consideration of the most relevant distance must take into account the ageing population.**

As the HEDNA makes clear the main demographic trend over the next few years will be an increase in the 65+ age group. Any concept of accessibility on foot must take this into account.

**g) Significant ‘behaviour change’ needs to be well established for this concept to succeed.**

In the Town & Country Planning Association document, *20-Minute Neighbourhoods Guide Creating Healthier, Active, Prosperous Communities An Introduction for Council Planners in England*, 2021<sup>2</sup>, and is aware of the barriers for developing successful 20MN, recorded in Section 7

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<sup>1</sup> Nationwide equity assessment of the 20-min neighbourhood in the Scottish context: A socio-spatial proximity analysis of residential locations (Jonathan R Olsen Lukar Thornton Grant Tregonning , Richard Mitchell)  
<https://pubmed.ncbi.nlm.nih.gov/36368061/>

<sup>2</sup> The Town & Country Planning Association: *20-Minute Neighbourhoods Guide Creating Healthier, Active, Prosperous Communities An Introduction for Council Planners in England*, 2021  
[https://tcpa.org.uk/wp-content/uploads/2021/11/final\\_20mnguide-compressed.pdf](https://tcpa.org.uk/wp-content/uploads/2021/11/final_20mnguide-compressed.pdf)

The document identifies the key blockers associated with:

- Intra- and cross-organisational governance
- Planning and development policy and enforcement
- Making greenfield developments work within broader geographic scales
- Investment, funding, and budgetary constraints
- Resident/user perception and the need for behaviour change

This highlights to critical importance of behaviour change amongst local residents. Without this, the concept will fail.

**h) There is a risk that the approach increases house prices.**

The various studies that have been carried out into 20 neighbourhoods all point to the risk of them becoming too attractive. If the location becomes too popular, then the housing will become more expensive. With the Affordability Factor already high locally, this would not be a help to our communities.

**i) The data in Appendix D is only a snapshot in time.**

Many of the criteria on which the scoring in Appendix D is based change frequently over time. It is not a sound basis for a long term plan.

**j) The data in the evidence base contains a significant number of factual errors**

In the Settlement Hierarchy paper (at 4.1.) it says that

*“Table 2 (below) highlights the ranking of the settlements in accordance with the scores from Appendix D. These scores are based on the three-stage methodology that has been described in this background paper”*

There are too many errors contained in Appendix D for there to be any confidence in drawing conclusions from this data set. For example, it states that there are no churches in Headley or Lindford; and there is no dentist in Clanfield.

**k) The methodology used for Appendix D significantly distorts the key conclusions.**

The methodology used states that the maximum score for any settlement is 2.

The Council believes that this approach distorts the data. For example, it would give a more accurate comparison if the data was based on the actual number of a particular facility. The data presented in Appendix D suggests that Four Marks/ South Medstead has 59% of the facilities of Alton. However, if both settlements were measured based on the actual number of facilities available, this would give a score of 233 vs 44 – or showing Four Marks/South Medstead having 17% of the facilities of Alton. The Council considers this to be a more accurate reflection of the size of the two settlements.





[REDACTED]

Our ref. [REDACTED]

Date: 19 January 2023

Dear [REDACTED]

**East Hants District Council Local Plan 2023-40**

Froyle Parish Council (FPC) discussed how best to respond to the draft EHDC Local Plan at its recent meetings. They were forced to conclude that each Councillor should provide their own individual comments as the structure and format of the document did not lend itself to a constituent group being able to either develop or submit a collective response. The Parish Council has sought to publicise the consultation process to residents through its website and all other communication channels it has available but have no idea how successful we have been in encouraging Froyle residents to comment. We concluded at our recent meeting that our concerns about the process should be raised with you directly and were supported in doing this by our District Councillor, [REDACTED]

The main comments we raised at our meeting on the consultation structure and process are as follows:

- i) Overall the Parish Council considered that the consultation document gave the impression of being both too broad, and yet too narrow, on certain matters, in a manner that will no doubt prove quite challenging and perhaps off putting to many laypeople, however interested they are in the subject.
- ii) The host of accompanying reference material for guidance on many of the subject areas – while very useful and undoubtedly informative was perhaps equally daunting for people who otherwise thought, at first sight, that they would be offering their opinions on a series of more focused multiple choice options. To respond effectively took a serious time commitment not a few minutes to fill in a questionnaire.
- iii) The questions were structured to elicit a personal response with the entry point to the process by a registered individual. As such a Parish Council would be required to try and collate responses outside the electronic process and submit these under the name of a nominated individual e.g. Parish Clerk. The nature of the questions made responses quite personal so even within a Parish Council it would be unlikely that a consensus response could be achieved.
- iv) The topics and questions were directional and did not identify specific issues on which a Parish Council could submit responses to issues on behalf of the community it represented.

For example, at the face to face meetings held in early December to launch the consultation, it was stated that it would not focus on sites yet when the document was published this was not the case. The ability for the Parish Council to respond

to such matters that were relevant to the Froyle community as a whole would have been an important consideration and input but was not possible to provide given the structure. There was no ability to provide a written letter style response as in previous consultations perhaps in addition to the multiple question format. This alternative submission approach does appear to be possible in the HCC HMWP consultation that is also ongoing at present

- v) While the questions were structured as multiple choice, in reality the responses could not be black and white. By responding to questions on siting of facilities in small, medium or large areas the initial preference that an individual may have was likely to be both impractical and contrary to other themes within the document e.g. re climate change, travel modes and distances etc.
- vi) It is unclear how clear messages and conclusions could be drawn from such responses. As with all questionnaires, we recognise that it is the narrative attached to an answer that is most informative so hope that respondents took the time to make these. Unfortunately the structure of the questions did not promote this as questions seeking agreement to the statements did not clearly provide an opportunity to comment. Furthermore, respondents would not always have the time or inclination to add comments feeling that they had 'done their duty' by responding and seeking to get it completed as quickly as possible.
- vii) The wide range of comments received on each individual topic raises questions about the structure of the consultation. Many of the topics raised issues that overlapped with other topics so by not requiring comments on each topic, the structure may have failed to obtain a holistic view of how people in East Hampshire felt about issues affecting the region in its entirety.
- viii) The structure of the consultation was an interesting one in that it appeared to encourage respondents to regularly revisit their responses and develop a dialogue with other comments that had been posted. It would be interesting to know how successful this was but, to our earlier point, it made the interaction very personal and not geared to a collective response such as from a Parish Council.
- ix) The Local Plan will cover the next 20 years during which the world will no doubt have changed significantly. As a result the validity of plans put in place in the 2020's may not apply in 10+ years' time. There was no indication of how EHDC viewed the future or a section to gauge respondents views on which areas they considered most likely to change over the validity of this Local Plan.

Large Corporates embarking on such exercises with a lot of future uncertainty that would impact their plans, develop alternative scenarios of how the world might develop and then illustrate the impact of their planning assumptions under each scenario. Similar scenario planning might prove valuable for this Local Plan e.g. in determining how housing, transportation, services and lifestyle needs might be different under two or perhaps three alternative scenarios for societal development in East Hampshire.

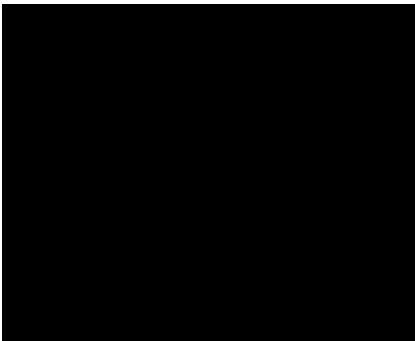
Froyle Parish Council appreciates that some of the above may sound simplistic in what was a complex exercise and getting the balance correct is very difficult. Regrettably the upshot of this format may have resulted in a less than desired level of effective engagement by the

public. Like everything else in society now, when it involves more time commitment than a Tik Tok video, then people below a certain age will almost certainly find an excuse to exclude themselves yet it is precisely the voice of the TikTok generation that needs to be engaged with as they will be most affected by the results of policies arising from this Local Plan when they are put in place.

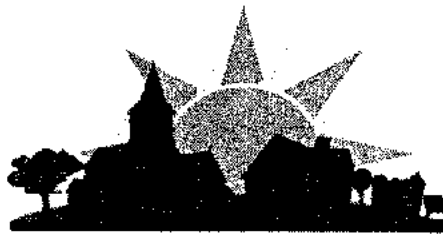
Hopefully the final number of respondents will have provided an adequate sample of opinion across EHDC but with less than 2000 responders registered the last time I looked and a maximum number of responses on any topic ('Overview'!) being 485, one must feel concerned about the lack of engagement generally and how much of this is down to the structure of the document being asked to comment on.

It will be interesting to hear the feedback from yourself and your team including the views of your communication consultant and whether you received feedback from other Parish Councils about their experience with the process and whether any managed to submit a collective response.

Yours faithfully,



Tel: [redacted] Email [clerk@froyleparishcouncil.org.uk](mailto:clerk@froyleparishcouncil.org.uk)



# GRAYSHOTT PARISH COUNCIL

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

10 January 2023

Dear Planning Policy Team

## **Local Plan consultation**

Grayshott Parish Council (GPC) would like to contribute to the consultation on the proposed Local Plan. However, as the consultation questionnaire is focussed on individual opinion, please accept this letter as the Council's submission.

### The consultation process

The council is supportive of the principle of this consultation and grateful to have an opportunity to be involved in the planning process.

- GPC thinks the consultation process and documents are hard for the general public to understand.
- The accessibility of the consultation seems limited for the breadth of the local population, in terms of the technical nature of the document, the usability of the interface, and only three in-person opportunities.
- GPC think the online questionnaire is very time-consuming and difficult to navigate and are concerned that this may lead to user frustration and aborted submissions.
- A low level of completion and low number of responses may lead to questionable validity of the data gathered and that it will not accurately represent the population. As at today's date the number of responses range from 295 on "Vision" to 74 on "Types of Housing Need" and 46 on "General Feedback"

### Draft Local Plan principles

- The Plan should not lose focus on the affordability of housing in EHDC, whilst adhering to the National codes, but not necessarily exceeding those standards.
- The provision of infrastructure is vital alongside housing developments.
- Each settlement should be considered in its own situation eg. the transport needs of rural/semi-rural communities are very different from those in towns.
- The Plan needs to demonstrate an awareness of the individual circumstances of those settlements which adjoin neighbouring Local Planning Authorities and the consequential impact of that location.
- All Local Planning Authorities should seek to fulfil their own allocations.

Grayshott Parish Council feels that residents will be more responsive to the next level of the Plan, when they can see the detail and how that impacts on where they live, and it welcomes the opportunity to work closely with EHDC on the next phase of the consultation and Local Plan.

Yours

GRAYSHOTT SPORTS PAVILION, BEECH HANGER ROAD, GRAYSHOTT, HAMPSHIRE, GU26 6LS

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**Hampshire &  
Isle of Wight  
Wildlife Trust**

Planning Policy  
East Hampshire District Council,  
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01489 774400

Submitted via email to: [localplan@easthants.gov.uk](mailto:localplan@easthants.gov.uk)

**16<sup>th</sup> January 2023**

**CONSULTATION:** East Hampshire Local Plan 2021-2040 - Issues and priorities Regulation 18  
Dear Planning Policy Team,

Hampshire & Isle of Wight Wildlife Trust are an independent charity founded in 1961 and together with 46 others we are part of The Wildlife Trusts, the largest grass roots nature conservation federation in the UK with 900,000 members. Locally across Hampshire and Isle of Wight we have over 27,000 members and we currently manage 5,000 hectares of land for wildlife, primarily nature reserves of local, national, and international importance.

We welcome the opportunity to comment on the draft East Hampshire Local Plan. While we are pleased to see the environment as a key issue of the Local Plan, we consider that the Local Plan in its current form suffers from a lack of development of key policies; it does not represent current best practice in policy clarity and ambition to put nature into recovery across the district.

The plan notes the ‘attractive rural setting’ of East Hampshire, with areas of the South Downs National Park and adjacency to the Surrey Hills AONB. Yet research has shown that most of the Hampshire countryside exists in a state of environmental degradation and that AONBs and even national parks can contain less abundance of nature than landscapes outside them. Aiming to preserve the character of the rural landscape is the wrong goal when we know that current policies are inadequate in protecting the depleted natural capital of the area and have not halted nature’s decline.

It is vital that this plan, that will affect policy for decades to come, is significantly reworked to reflect the reality of the urgent decline of nature in the district. Best practice for local plans will show an ambition for leadership, appropriate nature-based solutions to the climate crisis, and goals for significant nature recovery that are absent in this version of the plan. For example, the themes of ‘environmentally awareness’ and strategic objective of ‘playing a part in improving biodiversity’ do not reflect the leadership needed on these urgent issues.

It is a critical time for nature – we must halt nature’s decline and maximise the benefits that it brings into our lives, communities and economy. For example, as the district strives for net-zero, we urge you to further consider the role of nature-based solutions in both mitigating and adapting to climate change. They offer cost-effective solutions while providing multiple benefits for people, wildlife and the climate.

While we have detailed below our comments on the specific topics, we consider that investing in our natural assets should be considered as part of the foundation of our spatial planning. All planning decisions should be made with protecting and enhancing the District’s natural assets at the core to ensure a sustainable and resilient future for East Hampshire.

We urge you to embed the upcoming Hampshire Local Nature Recovery Strategy as the primary and authoritative foundational spatial layer in the Local Plan and fully participate in the creation process for the strategy. Land for housing should be strategically assessed alongside the need for food production, land for nature’s recovery and renewable energy and only delivered where there is the environmental infrastructure to support it. The Local Nature Recovery Strategies should be used to inform where housing should be avoided and where local authorities can direct Biodiversity Net Gain, Nutrient pollution mitigation and investment in green infrastructure to tackle climate change.

### **Comments on ‘Issues: Environment’ (page 37-46)**

Whilst we are pleased to see the environment as a key theme of the East Hampshire Local Plan, we believe there should be greater ambition and clarity set out in this theme and some areas need to be developed further in order to address the declines in nature locally.

East Hampshire plays a crucial role as the gateway to the South Downs National Park, a landscape that will play an increasing role in nature’s recovery as National Parks and AONBs are prioritised for nature protection. The Council should further consider its role in reconnecting the fragmented habitats with the South Downs by supporting the creation of a contiguous Nature Recovery Network that stretches across the district and through the National Park.

This document correctly stresses the need for conservation of biodiversity and rightly points out the need for a new planning dynamic for habitat conservation, yet the framing of these issues narrowly as a planning problem can mask the scale of ambition needed. Councils need to move beyond ‘consideration’ of biodiversity, to instead recognising the scale of the nature crisis by ensuring all spatial decisions across the local plan actively restore habitat. We recommend that this local plan be updated to focus on active nature recovery and at landscape level.

We therefore urge the Council to commit to create and protect a contiguous Nature Recovery Network as part of the Local Plan, in line with national commitments in the Environment Act 2021. While the objective does reference enhancing wildlife corridors, we

must see a full Nature Recovery Network completed and protected for nature by 2030 if we are to halt the decline of nature and meet the national targets set out in the Environment Act. This must not be confined to legally protected sites or council owned land but extended to provide habitat recovery and access to nature for all district residents.

Furthermore, The Wildlife Trusts are calling for at least 30% of land and sea to be restored for nature and climate by 2030, in line with national and international commitments – planned and delivered as a Nature Recovery Network and providing nature-based solutions such as pollution reduction, carbon removal and flood management.

We would welcome East Hampshire District Council joining this ambition by putting in place a clear target to halt the decline of nature by protecting at least 30% of land for nature by 2030 backed by mapping and appropriate policy mechanisms to ensure that the state of nature is turned around and wildlife starts to recover during this decade.

### **Biodiversity Net Gain**

The Trust strongly urges the council to go beyond the mandatory 10% Biodiversity Net Gain that is set out in the Environment Act 2021 to ensure that we see a measurable uplift in biodiversity in the District. The Trust would support a 20% Biodiversity Net Gain target set within the Local Plan.

Within the evidence presented by Defra consulting on the introduction of Biodiversity Net Gain into the planning system (December 2018-February 2019), it was made clear that an increase of 10% would be the absolute minimum necessary to ensure confidence that a net loss in biodiversity would be avoided - “..In simple terms, [10%] is the lowest level of net gain that [Defra] could confidently expect to deliver genuine net gain, or at least no net loss, of biodiversity and thereby meet its policy objectives.”

We recommend creating a bespoke policy, drawing on case studies such as [Kent County Council’s assessment](#) of the potential effect of a 15% or 20% Biodiversity Net Gain target on the viability of residential-led development in Kent and determine if an uplift from the mandatory 10% Biodiversity Net Gain would materially affect the delivery of development in the county from a viability perspective. In summary a shift from 10% to 15% or 20% Biodiversity Net Gain did not materially affect viability in the majority of instances when delivered onsite or offsite. The biggest cost in most cases is to get to the mandatory, minimum 10% Biodiversity Net Gain. The increase to 15% or 20% Biodiversity Net Gain in most cases costs much less and is generally negligible and because the Biodiversity Net Gain costs are low when compared to other policy costs, in no cases are they likely to be what renders development unviable.

We believe at least 20% net gain should be achieved, and that any offsite gains should be strategically targeted through Local Nature Recovery Strategies, secured in perpetuity and be additional to other commitments and initiatives to recover nature.

We would like to see a proposed Biodiversity Net Gain policy state a preference for an onsite first approach. This will provide measurable biodiversity uplift in urban developments and a wide range of social, economic and environmental benefits that will enhance the development and benefit the local community and wildlife. These benefits include:

- Increased health and wellbeing from access to green space and visual amenity;
- Flood mitigation;
- Increased resilience against extremes of climate;
- Improved air quality;
- Cooling through a reduction in urban heat island effects;
- Higher market value - houses in greener developments can have a higher market value;
- Attracting investment - high quality developments rich in natural green space can attract further investment from business and visitors;
- Opportunities for cycling and walking; and
- Enhanced potential for biodiversity and increased connectivity of habitats.

Encouraging developments to maximise on-site Biodiversity Net Gain through high-quality Green Infrastructure provisioning can help the Local Planning Authority meet multiple objectives. This can also have benefits for developers: delivery of biodiversity net gain on-site can minimize costs and increase the value of the development. For example, proximity to open space can enhance the value of a commercial property by 3% and housing by 18%.

We are also pleased to see that Ecological Network (or Nature Recovery Network) mapping will underpin where offsite Biodiversity Net Gain should be directed. We would like to see havant set out local priorities to strategically optimise habitat creation and enhancement in specified locations across the Plan area, which the local plan should describe and identify as outlined in paragraph 179 of the current NPPF. We would encourage this to be directed by the Local Nature Recovery Strategy.

Offsite Biodiversity Net Gain targeted to such areas can benefit from a Strategic Significance scoring in the Biodiversity Metric and will help contribute to wider nature recovery plans in addition to local objectives.

Well-designed Biodiversity Net Gain will contribute to Nature Recovery Network – a national network, to be described through Local Nature Recovery Strategies (LNRS), intended to enable more resilience by creating a network of bigger, better and more joined up sites for nature – which will also bring benefits for people.

For more information on Nature Recovery Network, we recommend reading the South East Nature Partnerships' 'Principles of Nature recovery Networks across the South East of



England' document, available here:

<https://hantswightlnp.files.wordpress.com/2021/07/joint-south-east-nrn-principles-senp.pdf>

We also consider that the greatest challenge for the implementation of Biodiversity Net Gain will be monitoring both onsite and offsite provisions, as habitats created will need to be maintained for 30 years, especially where Biodiversity Net Gain is in parallel to green infrastructure. We therefore suggest adding the following into your Biodiversity Net Gain Policy and/or any Supplementary Planning Documents:

- requiring regular reporting by developers
- a clear statement that failure to meet milestones in habitat condition would trigger a response from the Council
- statement that amenity features should not be claimed as having high ecological quality unless they have a robust ecological management plan.

The South East Nature partnership is also creating Biodiversity Net Gain best practice guidance for Local Planning Authorities which we will aim share with you in the next few months.

### **Nature Recovery Network**

The Trust is concerned that there is currently little mention of the Nature Recovery Network or ecological network within the Environment policy.

We would strongly recommend that the council commits to the creation and maintenance of a functioning Nature Recovery Network as this is a key mechanism through which the biodiversity of the district can be protected and enhanced. It is now well established that nature is in trouble and that to put nature on the road to recovery it needs bigger, better and more joined up space to thrive. The Nature Recovery Network, embedded within national policy through the Environment Act 2021, is the key mechanism to deliver nature's recovery within the local plan, providing multiple benefits and meeting the government's 25 Year Environment Plan targets.

Nature Recovery Network mapping is about taking a strategic spatial approach to the natural environment, identifying areas of existing value, and looking for opportunities to create connections with new habitats that will benefit people and wildlife. Without such spatial mapping, it will not be possible to identify where interventions are required in order to create the nature recovery network and thus deliver the environmental policy ambition.

Therefore, we strongly recommend that East Hampshire District Council prepare and use the Nature Recovery Network as a foundational tool for the Local Plan to:

- Identify areas within the local plan area that are of special importance within the context of the Nature Recovery Network, including: existing habitats that are of highest value, areas that buffer existing core habitat, and gaps within the existing

ecological network that, if filled, would improve ecological connectivity and reduce fragmentation.

- Assess, identify and prioritise opportunities for ecological enhancement through local plans and strategies.
- Identify the best sites for development and those areas where development should be avoided. Sites of core importance to the Nature Recovery Network should be protected and development should not result in severance of ecological connectivity within the network.
- Inform the design of any development in such a way that it makes a net contribution to the Nature Recovery Network.
- Inform and target biodiversity net gain delivery and other nature-based solutions.
- Inform the use of building standards that promote biodiverse developments within local plans (e.g., Building with Nature standards) to ensure that development targets action to most effectively contribute to restoring nature.
- Send a clear market signal to developers of your expectations for all future planning to contribute positively and meaningfully to nature's recovery.

### **Local Nature Recovery Strategy**

Furthermore, as mentioned above, the Local Nature Recovery Strategy will be a key mechanism through which you can embed the Nature Recovery Network as a spatial framework into the Local Plan.

We need all Local Authorities to commit to using the Local Nature Recovery Strategies within local planning if they are to be an effective tool to direct investment in nature's recovery through Biodiversity Net Gain, and other private finance through developers.

The Local Nature Recovery Strategy (LNRS) should be used by planning authorities to support land use planning in both plan making and development management. It should be used to ensure that the location of new development avoids the best areas for nature and associated action makes a positive contribution to nature recovery.

We urge you to ready your local plan for Local Nature Recovery Strategy and get involved in the process to ensure the outcome (biodiversity priorities and spatial mapping) can be fully utilised for your Local Plan.

### **Green Infrastructure**

We are pleased to see the council recognise the importance of green infrastructure in providing multifunctional spaces that contribute to people's health and wellbeing, as well as biodiversity and climate adaptation.

We would like to see the council going much further by adapting the green infrastructure policy to set high quality green infrastructure principles across the built footprints of new and existing areas. This would lead to increased sustainability of developments, boost climate resilience and public wellbeing, as well as increase value, support a resilient economy and desire to live in the area.

A modern and appropriately ambitious example of green infrastructure policy is the work recently conducted by Southampton City Council through their [‘Green Grid’](#)

*‘The green grid is Southampton’s network of green and blue infrastructure and operates as an integrated environmental resource within and extending beyond the city. It will be identified on the policies map and comprises:*

- i. Sites designated due to their nature conservation value;*
- ii. Other areas of habitat such as wildflower meadows;*
- iii. Open spaces and playing fields;*
- iv. Woodland; v. Street trees and other trees;*
- vi. Continuous stretches of garden;*
- vii. Vegetation along transport corridors; viii. Green walls and roofs; and*
- ix. Pond, streams and rivers (‘blue infrastructure’)*

*However, it also identifies green corridors. These are the green and blue (water course) habitat links between open spaces including the Greenways which follow river streams, trees and stretches of private gardens. Together they create the interconnections between open spaces both within the city and the surrounding countryside and waterfront.’*

An exemplary approach to green infrastructure would be the Trust’s [Building with Nature Standard](#), which sets a new framework for green infrastructure. It brings together existing guidance and good practice to recognise high-quality quality green infrastructure where wellbeing, biodiversity and water are core foundations. We recommend that all proposals for green infrastructure be expected to be designed with the Building with Nature standards, or an equivalent standard set by the Council. This will ensure that all green infrastructure is delivering maximum benefits for the health and wellbeing of residents, and for nature’s recovery.

### **Comments on climate change (page 14-20)**

We welcome the focus on tackling climate change as part of the Local Plan. However, we would like to see the climate change policies go beyond tree planting to consider a wider range of nature-based solutions.

In addition, any nature-based solutions (including tree planting) that aim to deliver increased levels of carbon sequestration must also provide additional benefits, including delivering increased biodiversity. These nature-based solutions should be strategically

targeted to form an integral part of the nature recovery network and put the foundations in place to tackle both the climate and nature emergencies long term.

For example, Winchester City Council's draft Local Plan (Regulation 18), recognises the role of nature-based solutions in policy CN1 which requires developments to demonstrate how the design enables the development to adapt to the impacts of climate change through 'multi-functional areas of open space, tree planting, biodiversity net gain' for the benefit of both people and wildlife.

Nature-based solutions should also consider improving habitats and species resilience to climate change and aide their adaption to a changing climate. We encourage the district to identify the impacts of the climate crisis on nature locally and ensure this is taken into account for all decisions.

Hampshire and Isle of Wight Wildlife Trust is well positioned to deliver nature-based solutions, prioritising significant added value for biodiversity. We are currently one of the only organisations delivering an established nitrates mitigation programme that also delivers additional wildlife and pollution reduction benefits and transforms intensive agricultural land into nature reserves that are safeguarded. We will soon be launching other nature-based solutions services. Please get in touch to discuss this further with us.

### **Natural Capital and Ecosystem services**

We also encourage that the Draft Local Plan should include an ecosystem services policy which would aim to protect and improve natural capital and harness the role of nature-based solutions to tackle some of the societal and environmental challenges facing the District. This would align with revised NPPF paragraph 170 (b) which requires planning policies and decisions to recognise the benefits from natural capital and ecosystem services.

A good example of an effective Ecosystem Services policy is in the [South Downs Local Plan \(Core Policy SD2\)](#) which requires developers to demonstrate how a development proposal impacts, both positively and negatively, on ecosystem services. They provide an ecosystem services map along with an [Ecosystem Services Technical Advice Note](#) which provides advice on how to take ecosystem services into account and what 'actions' are the most appropriate for the application.

We recently published the [Hampshire and Isle of Wight Local Nature Partnership's 'Natural Wealth' report](#) which aims to provide evidence for the state and extent of our county's natural capital and provides recommendations for local planning authorities to embed the approach across their activities, including through planning. Please let us know if you would like to discuss the report further.

### **Nutrient mitigation**

The eutrophication of the Solent waters due to raw sewage from storm overflows and agricultural runoff is widely recognised. It is vital that existing wastewater management infrastructure is fit for purpose and any additional development is properly provisioned to achieve nitrate and nutrient neutrality.

We are encouraged to see the council consider this within the environment theme. We strongly encourage the Council to create a standalone water quality policy that gives a strong preference to nitrate mitigation schemes that will deliver wider environmental benefits, especially for biodiversity.

For example, the Trust's Nitrate Reduction Programme is demonstrating a way of mitigating and reducing the impact of nitrates in the Solent from planned housing developments, through the creation of new nature reserves on formerly intensively managed farmland - creating new habitats for local wildlife and helping nature to recover. We would be pleased to discuss these in more detail with you.

### **Hampshire & Isle of Wight Wildlife Trust answers to the questions proposed in the East Hampshire Local Plan**

**VIS1 How do you feel about this vision?** Very unhappy. The local plan needs to be re-written with a more ambitious strategic vision for nature recovery and district resilience to the climate and nature crises.

**VIS2 Does the vision cover the key matters of importance that the Local Plan can influence and inform?** No.

**VIS2a If no, please tell us what is missing from the vision and why this is important.**

We consider that this vision completely fails to show the ambition of restoring East Hampshire's natural environment, which underpins the fundamental future resilience of the district. As well as providing homes and policies for tackling the climate emergency, the local plan should be central to restoring and reconnecting habitats and this should thus be reflected in the vision. This is especially important for East Hampshire's district as the gateway to the South Downs National Park. Climate, biodiversity, green spaces and challenges such as flooding, drought, water and heat stress need to be holistically tackled in an ambitious local plan, rather than the inappropriate approach of siloeing these interconnected themes. This local plan represents a significantly less developed understanding of these issues compared to many comparable districts across the region.

**OV1 Please sort these key issues and priorities in order of importance to you.**

Environment, Climate Emergency, Infrastructure, Population and Housing, Types of Housing Needs,

**POP1 How do you think we should proceed?**

Further explore whether exceptional circumstances exist to be able to devise a revised local housing requirement POP1a Please explain your answer.

**POP1a Please explain your answer.**

Given that most of the District sits within South Downs National Park, there is a clear case for exploring exceptional circumstances given the environmental and geographical constraints of the District.

**CLIM1 Do you agree that new development should avoid any net increase in greenhouse gas emissions, wherever practicable? Yes**

**CLIM4 In the future, should the Council's policies on the design of new buildings focus more strongly on tackling climate change in accordance with the energy hierarchy?**

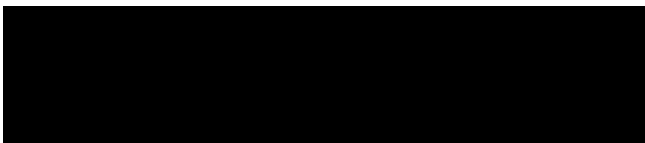
**CLIM5 Should the detailed criteria for tackling climate change be specified in any of the following:**

- **In the emerging East Hampshire Local Plan - Yes**
- **In future neighbourhood plans - Yes**
- **In local design codes - Yes**

**ENV1 Which of the below environmental considerations is most important to you? Sorted in order of importance, from the most important to the least.**

We consider that this is an inappropriate and irrelevant question to ask the public if the local plan consultation has ambition to restore nature. Protecting, expanding and connecting habitats in a functional 'Nature Recovery Network requires an ambitious and strategic policy for land use that cannot be ranked in this simplistic fashion. Likewise, conserving the character of the rural landscape does not directly relate to any of these other three measures which nullifies the usefulness of public responses to this question.

**Yours Sincerely,**



**Main Switchboard: 01489 774400**



## Hampshire and Isle of Wight



Hampshire and Isle of Wight Integrated Care Board  
Hampshire Fire & Police Headquarters  
Leigh Road,  
Eastleigh  
SO50 9SJ

01 March 2023

[REDACTED]  
**Planning Team**  
**East Hampshire District Council**  
Penns Place,  
Petersfield,  
Hampshire  
GU31 4EX

Dear [REDACTED]

### **East Hampshire District Council Local Plan Consultation: Primary Care response**

Following the publication of East Hampshire District Council's Local Plan Regulation 18 consultation, I am writing to you to set out the Hampshire and Isle of Wight Integrated Care Board's (ICB's) primary care response, as well as our early views on the impact of proposed development contained within the Local Plan 2017-2023 Large Development Sites consultation, in lieu of an available Strategic Housing and Economic Land Availability Assessment.

We have been working with our Practices and Primary Care Networks across the East Hampshire area to understand their clinical vision and plan to respond to an increasing population with more complex conditions. Many of our Practices feel the current level of development in their area is unsustainable for local primary care services to appropriately manage and proactively care for. To do so, they need significant capital investment into the infrastructure that underpins the delivery of services and grows with the local population.

Our general practice colleagues often absorb increases in patient population because of new development without a clear plan or resource to manage the additional activity that this creates. Whilst the ICB receives a small capital funding pot (£3.1m per annum across all our geography, which includes GP IT equipment) to assist with capital improvements annually, this budget is significantly oversubscribed, and many practices are not able to self-fund or landlord-fund the improvements and expansion they need to continue to sustain safe services. Appropriate NHS infrastructure is of course of high priority to developers and planning authorities in determining where new development should be sited, and we would like to continue to work closely with you to ensure investment into primary care estate is supported and prioritised accordingly. To this end, we have attached a financial developer ask apportioned to each proposed development area, as well as a detailed overview of the capacity (or not) of each practice.

The attached appendix should be considered as our interim response to Large Development Sites being considered by East Hampshire District Council, as well as comments on the draft Local Plan. Where our submission finds that surgeries within the allocations are already oversubscribed, we object to the proposed development sites unless capital can be allocated to support growth. Where our submission finds that surgeries within the allocations have capacity, we neither support nor object to these allocations.

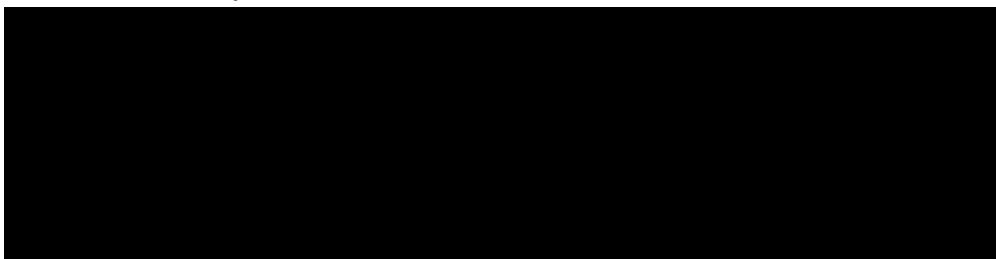
Appropriate estates infrastructure is just one of the underpinning tools required by primary care to provide safe and sustainable services. As you will be aware, our General Practice colleagues and the NHS generally are experiencing significant difficulties with a reduced and fatigued workforce, an ageing population with more complex conditions and increasing comorbidities, and higher expectations regarding health service delivery from the public. Activity levels within primary care have not reduced to pre-Covid levels, and recent challenges facing the sector are not expected to diminish in the short to medium term. Whilst developer contributions may assist with easing estate pressures, the wider challenges facing the system may mean that development may not be supported by the ICB because of the impact on those elements noted above.

Whilst we appreciate each Planning Authority has a housing development allocation it must deliver within its boundary, it is important that we have a collaborative approach to such development, to ensure our health services are appropriately supported to plan for growth in their services and can remain resilient. We also want to ensure that primary care colleagues are consulted on the impact that any future development may bring once the Local Plan has been adopted. Practices are required to keep an open list for new patient registrations in line with their contract, even when they have undersized estate or challenges with their workforce; Practices must evidence that they can no longer provide a safe service if they take on new patients if they wish to apply to close their list. The risk of unmanaged development is that more Practices within the East Hampshire boundary will feel that they cannot provide a safe service, and new patients moving into the area will have to travel further afield to access provision.

Similarly with primary care provision, dental access requires expansion in line with population increases to ensure the needs of the existing and new population is accommodated. Dental access is on the national agenda due to the limited NHS capacity available to the population.

We are keen to continue this conversation through our Local Estates Forums, and through our partnership working with planning colleagues. My ICB colleagues would be happy to meet with colleagues to discuss the contents of our submission further.

Yours Sincerely,





**East Hampshire District Council**  
Penns Place  
Petersfield  
Hampshire  
GU31 4EX

**NHS Hampshire and Isle of Wight**  
Local Planning Engagement Team  
1<sup>st</sup> Floor Estates and Facilities  
Torbay Hospital  
Loves Bridge  
TQ2 7AA

Date: 01 March 2023

Dear [REDACTED]

With reference to: **Issues and Priorities Regulation 18 – Part 1** and **Local Plan 2017-2033 Large Development Sites Consultation**

Please find below the response from Hampshire and Isle of Wight Integrated Care Board (ICB) to the Issues and Priorities Regulation 18 – Part 1 and the previously proposed Large Development Sites documents for the new East Hampshire Local Plan.

We believe that health infrastructure should be of highest priority within the emerging Local Plan in line with question INF1, and we have previously discussed the importance of framing primary care needs within any emerging Infrastructure Plan. We note that East Hampshire District Council (EHDC) prefer the use of Community Infrastructure Levy (CIL) to mitigate against the impacts of development on local infrastructure, and have outlined below where we feel the use of this would be appropriate across GP surgeries in your geography.

In response to INF2, to date, we feel the ICB and EHDC have enjoyed a positive relationship and we appreciate the Council's approach to funding health infrastructure through CIL, such as recent successful bids in the Alton area. We know that deliverability remains a key risk for both of our organisations, given that GP surgeries must fund at least 34% of any improvements to their owned or leased buildings as per the National Health Service (General Medical Services – Premises Costs) Directions 2013, but we have indications that this limit may change for developer contributions in the emerging Directions, date of publication to be confirmed. We feel that CIL should be allocated based on need, and therefore should be used to fund a mixed size of sites across the geography (INF3).

The proposed sites have been reviewed on behalf of the following NHS providers and associated services:

1. NHS Hampshire and Isle of Wight Integrated Care Board (Primary Care): GP Services

The NHS has reviewed the proposed sites which have been identified as suitable for development in line with the Large Development Sites Consultation document 2019 which East Hampshire Council published in 2019. We have produced an analysis of the potential impacts on ongoing primary care health services which will need to be considered as part of any future planning request.

In order to undertake an assessment of the effect of the Large Development sites we have reviewed the developments with the GP Practices that serve the local population. To forecast population for each development, the maximum number of dwellings has been used with an average occupation of 2.4 (England national average) people per dwelling.

These are main highlight points from the more detailed analysis:

1. Currently there are 16 GP Practices and branch surgeries that provide primary care services for the whole of East Hampshire. 12 surgeries will serve the planned Large Development sites listed in the East Hampshire document. 9 Surgeries are in the East Hampshire boundary, 2 in Winchester City Council boundary and 1 in the Surrey Heath boundary.
2. Overall, the 12 GP practices (75%) in East Hampshire have more patients than they physically have capacity to manage.
3. Currently there are 14,423 more patients near the Large Development site areas than there is capacity in the surgeries effected and the Large Development sites could increase this by a further 19,761 patients. This would make a total of 34,184 more patients than these surgeries can physically serve unless a capacity mitigation exercise is carried out.

In December 2022 a comprehensive primary care estates review was carried out on behalf of the East Hants Primary Care Network and the Swan Primary Care Network (PCN) in partnership with the Hampshire and Isle of Wight Integrated Care Board (ICB). Below are some extracts from that review.

### **December 2022 Primary Care Estates Review (Extracts)**

A review of East Hampshire's PCN's Primary Care premises has been carried out by the ICB to assess current utilisation of the estate in the East Hants and Swan Primary Care Network areas, to identify the capacity required to deliver services to a growing population and to provide options for the location of the future General Medical Service (GMS) provision. Specifically:

- To provide technical healthcare planning expertise and conduct site surveys for the GP practice sites to assess their current and future space requirements to inform the overall estates strategy plan for the PCNs;
- To look at the projected population growth and identify which facilities will be impacted the most;
- To look at new ways of working and the requirement to zone and manage the flow of patients and staff to minimise the risks of cross infection in light of the COVID-19 pandemic;
- To model the increased future demand of additional services that are anticipated within the facilities, such as community services and PCN activities;
- To scope feasible site development options with public sector partners and potential third-party developers;
- To report on high level Capital Expenditure (CAPEX) cost implications.

Reviewing properties against NHS Primary Care Building Guidance published in 2013, most of the current practices (based on reimbursement of rent sizes (m<sup>2</sup>)) are undersized when compared to Health Building Note (HBN) HBN 11-01 "Facilities for Primary and

Community Care Services”, with Badgerswood Surgery, The Clanfield Practice, Horndean Surgery and Rowlands Castle Surgery being under most pressure in the East Hants PCN.

The Swan PCN had a general lack of space across all four sites which is most acute in both Liphook surgeries and the main Swan surgery in Petersfield. Due to the way the Swan medical practice operates services, the Petersfield practice is the primary site which deals with urgent on the day appointments for all of its sites.

The East Hants PCN’s vision for service delivery is to provide a base for the new primary care Additional Roles Recruitment Scheme (ARRS). The ARRS scheme adds additional specialist roles to General Practice to create bespoke (multi-disciplinary) team of staff in the practices. The PCN plans to have an administrative base in the north of the PCN area and in the south.

The Swan medical practice operate a different model due to smaller geography, the PCN has struggled to recruit workforce into roles as they do not have space to adequately provide accommodation for staff to work from and see patients.

### **Bordon Health Hub**

The Health Hub development in Bordon will ease the future demand on estate in the north of the East Hampshire area as the proposed facility will increase the provision of GMS Space with an additional 11 clinical rooms and 66 PCN desk spaces.

Even with the new Health Hub at Bordon, there is no capacity within the overall PCN estate to cope with these additional patients and ARRS staff. The Swan PCN accommodation position is also challenging with a long term ambition to co-locate both Liphook surgeries into a functionally suitable building which can grow with the increase in patients from new developments. This has not been possible to date due to availability of funding, and recent surgery mergers.

The recent spending review has not allocated capital funding for Primary Care developments, Therefore central NHS funds are not available for projects that will solve these issues.

The conclusion is that both East Hampshire and Swan Primary Care Estate will require non-NHS financial input to improve the services offered to the citizens of East Hampshire in order to future proof optimum primary healthcare.

### **Winchester Rural North and East Primary Care Network Estates Review**

A review of Winchester Rural North and East (WRNE) PCN’s premises has been carried out by the PCN in conjunction with the ICB to assess current utilisation of the estate across their practices. The review also sought to identify the capacity required to deliver services to a growing population and to provide options for the location of the future GMS provision. The original review took place in 2021, and was updated in August 2022. The Watercross Surgery forms part of this PCN, the catchment of which covers the north east of the District Council geography, including Alton, Medstead and Four Marks. Specifically, the review sought:

- To provide technical healthcare planning expertise and conduct site surveys for the GP practice sites to assess their current and future space requirements to inform the overall estates strategy plan for the PCNs;
- To look at the projected population growth and identify which facilities will be impacted the most;

#### 4 | NHS Hampshire and Isle of Wight ICB - Primary Health Care

- To look at new ways of working and the requirement to zone and manage the flow of patients and staff to minimise the risks of cross infection in light of the COVID-19 pandemic;
- To model the increased future demand of additional services that are anticipated within the facilities, such as community services and PCN activities.

Reviewing properties utilising HBN 11-01, the review found that whilst Watercress Surgery is at capacity in terms of space utilisation, it is appropriately sized for the current population it serves when compared to HBN 11-01 and has a relatively static patient list size. In conversation with the Surgery, we are aware that the footprint of the surgery, which is owned by Partners, has room to expand subject to the relevant planning permissions and therefore, should the Partners wish to do so, could grow its estate to match increases in local population due to development in their catchment boundary. More holistically, WRNE PCN's vision for service delivery is to provide a base for the primary care ARRS staff in the practices, and to have an admin and management hub in Bishop's Sutton.

A31 PCN have not completed a strategic estates review to date, but upcoming work completed through the PCN Toolkit will provide an estates strategy for this group of practices. Unfortunately this will not be completed in time for this consultation submission, but should be available before the next iteration of the draft Local Plan process.

Whilst some capital funding may be forthcoming from the GP partners and potential future NHS England capital, funding from large new developments must also play a part. Residential development will introduce new patients into the area overtime. Section 106 requests to improve primary care facilities that are effected by new housing developments will therefore make a significant contribution towards this capital funding,

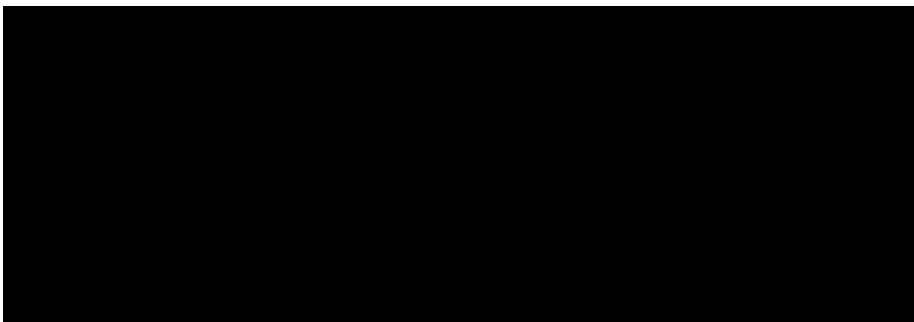
Following conversations with East Hampshire District Council the NHS has been requested to provide indicative developer contribution requests. Based upon the maximum dwelling estimates for the proposed sites the following indicative contribution requests have been calculated:

**Primary Care: £615 per dwelling:**

The contributions will be used to either expand existing GP surgeries or support the building of new surgeries.

The calculation is based upon the NHS Health Contributions Approach using the Health Building Note 11-01: "Facilities for primary and community care services." As issued by the Department of Health.

Yours sincerely,



**NHS Responses to Local Plan Site Options Consultation**

<b>Town</b>	Bordon		
<b>Local Plan Dwellings</b>	1284	<b>Potential Population</b>	3,081
<b>Developments</b>			
Whitehill & Bordon			
<b>GP Surgeries</b>			
Pinehill Surgery BadgerswWood & Forest (Forest Surgery)			
<b>NHS Hampshire and Isle of Wight ICB - Primary Care Response</b>			
<p>1. There is no vacant or void space within the Pinehill building. It would be possible to extend the footprint of the facility, subject to land ownership issues but this would result in a loss of parking spaces. It may be possible to make first floor rooms compliant by incorporating a lift.</p> <p>2. The Health Hub development in Bordon will ease the future demand on the estate as the proposal is to provide 18 clinical rooms, and replace of the Forest Surgery. This will add 11 clinical rooms and c.6 desk spaces.</p> <p>These changes and the development of the Whitehill and Bordon Health Hub, to meet the increase in population caused by this developemnt will require financial support. The ICB will continue to work closely with EHDC on te delivery of the Whitehill and Bordon Health hub and as it progresses the masterplanning pf the “Old Town”.</p> <p>The ICB will therefore be requesting this development to contribute towards this financial support through s106 contribution requests.</p>			
<b>East Hampshire District Council – Local Plan Policies (Review)</b>			
<b>Page 47 Local Plan Review: Infrastructure</b>			
<p>We rely on infrastructure to support our daily lives. It is vital when planning for our area’s future that full account is taken of the infrastructure needed to deliver sustainable growth and what opportunities there are to help reduce gaps in existing provision. It is also critical to ensure these essential facilities and services are delivered at the right time and in the right place.</p> <p>What do we mean by ‘infrastructure’?</p> <p>The term covers a wide range of services and facilities, from those we use everyday to others we use more occasionally. It includes things like:</p> <ul style="list-style-type: none"> <li>• Public transport - buses, trains and bike hire schemes</li> <li>• Footpaths and cycle routes</li> <li>• Roads</li> <li>• Health services - such as GPs and hospitals</li> <li>• Schools and colleges</li> </ul>			

**Page 48: Infrastructure**

Local infrastructure improvements are primarily funded by CIL money. In some cases, infrastructure is paid for by another means called S106 agreements – this is generally used for infrastructure that is specifically linked to a development.

<b>Town</b>	Liphook		
<b>Local Plan Dwellings</b>	600	<b>Potential Population</b>	1,440
<b>Developments</b>		<b>GP Surgeries</b>	
Land South East of Liphook		Swan Medical Group: <ul style="list-style-type: none"> <li>Liphook &amp; Liss Surgery &amp; Liphook Village Surgery</li> </ul>	

**NHS Hampshire and Isle of Wight ICB - Primary Care Response**

**The GP surgeries that serve these potential sites are currently over subscribed by 5,134 patients of December 2022. The additional dwellings from the local plan will add a further 1,440 patients and in order to mitigate this the NHS will be seeking financial contributions to increase the primary care space.**

To accommodate this increase in patient registration, the two surgeries affected will require significant reconfiguration and extension. Ultimately the practices will require a new building to deliver General Medical Services to this population . The Petersfield surgery currently sees patients for on the day (urgent) appointments which cannot be accommodated at either Liphook practice. A small amount of internal space may be released by the conversion of an internal atrium which is currently under discussion and may support very some short term urgent treatment capacity.

The ICB will therefore be requesting this planned development to contribute towards these changes through s106 contribution requests.

If the Council wishes the ICB to request CIL to meet the finance of these projects then the surgeries need to be added to the CIL charging schedule and a reserve a minimum of £369,000 to be ring fenced for the reconfiguration/ redevelopment of these surgeries.

**East Hampshire District Council – Local Plan Policies (Review)**

**Page 5: Section 6.4**

The Local Plan can support primary health care infrastructure improvements by:

- Continuing to work closely with the Hampshire and Isle of Wight Integrated Care System (ICS) and individual GP Practices to encourage submission of CIL bids, so money from new development is used to support improvements to health infrastructure

<b>Town</b>	Horndean		
<b>Local Plan Dwellings</b>	1,000	<b>Potential Population</b>	2,400
<b>Developments</b>			
Hazleton Farm Horndean			
<b>GP Surgeries</b>			
Horndean Surgery The Oaks Healthcare Cowplain The Village Surgery			
<b>NHS Hampshire and Isle of Wight ICB - Primary Care Response</b>			
<p><b>The GP surgeries that serve these potential sites are currently over subscribed by 5,154 patients of December 2022. The additional dwellings from the local plan will add a further 2,440 patients and in order to mitigate this the NHS will be seeking financial contributions to increase the primary care space.</b></p> <p>In addition, two of these surgeries are in the Winchester City Council boundary and will receive further pressure from two specific developments announced in the Winchester City Council Local Plan review. The possible planned developments in the Winchester Local Plan will introduce a further 3,979 potential patients for these surgeries.</p> <p>Horndean surgery has a small amount of infrastructure capacity left but this will be absorbed by the increase in the local population caused by this development. Further clinical space could be obtained by reconfiguring the surgery to increase it's consulting room capacity. Earlier this year additional reimbursable clinical space within Horndean Surgery has been agreed by the ICB. There is further space that could be released.</p> <p>Accordingly, The ICB will therefore be requesting this planned development to contribute towards these changes through s106 contribution requests to meet that reconfiguration.</p>			
<b>East Hampshire District Local Council – Local Plan Policies (Review)</b>			
<p>The below statement is extracted from the East Hampshire Local Plan review. The <b>ICB must robustly point out that an open patient list at a GP surgery is not an indication that the surgery has patient or infrastructure capacity. In most cases the GP practice is fulfilling its obligation under the contract that it has been awarded by the ICB whether there is capacity or not.</b></p> <p><b>Page 6: Section 6.9</b></p> <p>Increases in populations add additional people to GP practices lists. It is very rare that a GP practice cannot accommodate new residents due to having a closed list. No GP practices in East Hampshire currently have closed lists or are anticipated to at present.</p>			

<b>Town</b>	Bentley		
<b>Local Plan Dwellings</b>	800	<b>Potential Population</b>	1,920
<b>Developments</b>		<b>GP Surgeries</b>	
Northbrook Park		Holly Tree Surgery (Surrey heath)	
<b>NHS Hampshire and Isle of Wight ICB - Primary Care Response</b>			
<p><b>The GP surgery that serve this potential site is currently over subscribed by 592 patients of October 2022. The additional dwellings from the local plan will add a further 1,920 patients and in order to mitigate this the NHS will be seeking financial contributions to increase the primary care space.</b></p> <p>Bentley Village Surgery closed permanently in March 2022 due to a lack of available GPs. This has exacerbated an already difficult problem in this area and the closest GP practice to this site is Holly Tree Surgery which is in the Surrey Heath ICB.</p>			
<b>East Hampshire District Council – Local Plan Policies (Review)</b>			
<p>This particular site does not support the statements from the East Hampshire Local Plan Review as this is a cross boundary situation (see below)</p> <p><b>Page 5: Section 6.4</b></p> <p>The Local Plan can support primary health care infrastructure improvements by:</p> <ul style="list-style-type: none"> <li>• Identifying locations that are key strategic health infrastructure and ensure the Local Plan supports their needs and ambitions</li> <li>• Allocating key health infrastructure that has intentions to extend, to provide in principle certainty for the provider</li> <li>• Continuing to work closely with the Hampshire and Isle of Wight Integrated Care System (ICS) and individual GP Practices to encourage submission of CIL bids, so money from new development is used to support improvements to health infrastructure.</li> </ul>			



<b>Towns</b>	Four Marks/ Alton		
<b>Local Plan Dwellings</b>	1,200	<b>Potential Population</b>	2,880
<b>Developments</b>			
Chawton Park			
<b>GP Surgeries</b>			
Chawton Park Surgery			
<b>NHS Hampshire and Isle of Wight ICB - Primary Care Response</b>			
<p><b>The GP closest GP surgery that serves this potential site, Chawton Park Surgery, currently has infrastructure capacity as of December 2022 and can register a further 1,409 patients. The additional dwellings from the local plan will add a further 2,880 patients and in order to mitigate this the NHS will be seeking financial contributions to increase the primary care space.</b></p> <p>Chawton Park Surgery have previously submitted a CIL allocation in 2022/23 to reconfigure internally on the ground floor, intending to reduce the size of two treatment rooms and remove a child play area to create two new offices. Owing to an increase in the cost of construction, the Practice have not yet started this work and intend to make a further CIL application in 2023/24.</p> <p>To achieve this full funding requirement the ICB will therefore be requesting this planned development to contribute towards these changes through s106 contribution requests to meet that reconfiguration. The funding will be kept separate from the CIL draw down to keep within the CIL regulations by utilising s106 contributions to specific projects within the redevelopment of the surgery.</p> <p>Alternatively, a Health charge for the surgery could be added to the new CIL charging schedule and a sum of £376,943 can be ring fenced to complete the surgery reconfiguration.</p>			
<b>East Hampshire District Council – Local Plan Policies</b>			
<p><b>Page 5: Section 6.4</b></p> <p>The Local Plan can support primary health care infrastructure improvements by:</p> <ul style="list-style-type: none"> <li>• Identifying locations that are key strategic health infrastructure and ensure the Local Plan supports their needs and ambitions</li> <li>• Allocating key health infrastructure that has intentions to extend, to provide in principle certainty for the provider</li> <li>• Continuing to work closely with the Hampshire and Isle of Wight Integrated Care System (ICS) and individual GP Practices to encourage submission of CIL bids, so money from new development is used to support improvements to health infrastructure.</li> </ul>			

<b>Area</b>	Holybourne/ Alton		
<b>Local Plan Dwellings</b>	600	<b>Potential Population</b>	1,440
<b>Developments</b>		<b>GP Surgeries</b>	
Neatham Down		The Wilson Practice (Alton Health Centre)	
<b>NHS Hampshire and Isle of Wight ICB - Primary Care Response</b>			
<p><b>The closest GP surgery that serves these potential sites, The Wilson Practice, is currently over subscribed by 2,554 patients of October 2022. The additional dwellings from the local plan will add a further 1,440 patients and in order to mitigate this the NHS will be seeking financial contributions to increase the primary care space.</b></p> <p>The Wilson Practice successfully bid for CIL last year to convert a records room into usable clinical space – they are however out of lease at the moment (NHS PS building) and future improvements to this building will be made via NHS Property Services, as their landlord. NHS PS may wish to explore the use of CIL directly with EHDC.</p> <p>To renew the lease and increase the physical infrastructure capacity of the building and meet the existing demand the practice will require either s106 contributions from this development or be allocated on to the CIL charging schedule. The amount that requires ring fencing to meet this proposed development will be in the region of £369,000.</p>			
<b>East Hampshire District Council – Local Plan Policies</b>			
<b>Page 5: Section 6.4</b>			
<p>The Local Plan can support primary health care infrastructure improvements by:</p> <ul style="list-style-type: none"> <li>Continuing to work closely with the Hampshire and Isle of Wight Integrated Care System (ICS) and individual GP Practices to encourage submission of CIL bids, so money from new development is used to support improvements to health infrastructure</li> </ul>			

<b>Town</b>	Four Marks		
<b>Local Plan Dwellings</b>	2,750	<b>Potential Population</b>	6,600
<b>Developments</b>		<b>GP Surgeries</b>	
Four Marks South 700-800 Land South of Winchester Road 600-700 South Medstead 600 West of Lymington Bottom Road 650		Boundaries Surgery Watercross Mansfield Park Surgery	
<b>NHS Hampshire and Isle of Wight ICB - Primary Care Response</b>			
<p><b>The GP surgeries that serve these potential sites currently has infrastructure capacity as of December 2022 and can register a further 875 patients. The additional dwellings from the local plan will add a further 6,600 patients and in order to mitigate this the NHS will be seeking financial contributions to increase the primary care space.</b></p> <p>The four potential large development sites listed in the Large Development site document total 2,750 new dwellings, all in close proximity to each other. This will add a possible 6,600 new patients to the two GP surgeries that are in the sites catchment areas. This has the potential to overwhelm the primary care provision in the area.</p> <p>The concentration of new housing in the Four Marks area will need a radical rethink of how the ICB delivers primary care in this area. The two practices currently sit in different PCN geographies which may add complexity to finding a solution. However, the ICB will work with the practices to encourage collaboration and strategic thinking to this potential challenge, and would welcome EHDC's involvement in this as a key stakeholder.</p> <p>Section 106 contributions could potentially yield £1.69m for any potential new site(s) but this will not be enough. Early discussions between EHDC and the NHS ICB is recommended to ensure that primary care delivery is not compromised</p>			
<b>East Hampshire District Council – Local Plan Policies (Review)</b>			
<p><b>Page 5: Section 6.4</b></p> <p>The Local Plan can support primary health care infrastructure improvements by:</p> <ul style="list-style-type: none"> <li>• Identifying locations that are key strategic health infrastructure and ensure the Local Plan supports their needs and ambitions</li> <li>• Allocating key health infrastructure that has intentions to extend, to provide in principle certainty for the provider</li> <li>• Continuing to work closely with the Hampshire and Isle of Wight Integrated Care System (ICS) and individual GP Practices to encourage submission of CIL bids, so money from new development is used to support improvements to health infrastructure.</li> </ul>			



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

Registered Office:-  
Hampshire Chamber of Commerce  
Fareham College  
Bishopsfield Road, Fareham,  
Hampshire, PO14 1NH

Email: [localplan@easthants.gov.uk](mailto:localplan@easthants.gov.uk)

Monday 16<sup>th</sup> January 2023

Dear Sir or Madam,

**OBJECTION TO THE EAST HAMPSHIRE LOCAL PLAN**

Thank you for allowing Hampshire Chamber of Commerce (including it's Planning & Transport Business Strategy Group) with the opportunity to provide our feedback regarding the East Hampshire Local Plan.

A Consultation has been published seeking responses to the proposed revisions to the National Planning Policy Framework. The revisions include changes to paragraph 62 now 63 with regard to establishing housing need, it states **“Within this context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to: those who require affordable housing – families with children; older people including for retirement housing, housing-with-care and care homes; students; people with disabilities; service families; travellers; people who rent their homes and people wishing to commission or build their own homes <sup>(33)</sup>”**

The footnote <sup>(33)</sup> states: **“Under section 1 of the Self Build and Custom Housing building Act 2015, local authorities are required to keep a register of those seeking to acquire serviced plots in the area for their own self-build and custom house building. They are also subject to duties under sections 2 and 2A of the Act to have regard to this and to give enough suitable development permissions to meet the identified demand. Self build and custom-build properties could provide market or affordable housing.”**

We would like to highlight that there is no reference in the East Hampshire Local Plan Consultation to self and custom build housing.

**We would like to highlight the following objections to the East Hampshire Local Plan:-**

**1.0 INTRODUCTION**

- 1.1 This objection relates to the fact that the Local Plan has failed to meet the government's requirements to provide sufficient plots for self build and custom build housing. It is considered that the Council has not been transparent in this matter. It has ignored the duty to make provision as set out in the relevant Acts.
- 1.2 Councils generally suppress demand for a variety of reasons. The objection sets out the case to make specific allocations for self build and custom build housing in order to meet the real demand.

**2.0 GOVERNMENT ADVICE**

- 2.1 The government is committed to diversifying the housing market. The White Paper "Fixing our Broken Housing Market" 2017 emphasised the need to help small builders and developers and it placed considerable emphasis on the desirability of promoting self build and custom build housing.
- 2.2 This commitment is enshrined in the Self Build and Custom Build Housebuilding Act 2015 and the Housing and Planning Act 2016. The main points are:-

**Self build and Custom Build Act 2015**

- 2.3 This Act imposed a duty on local planning authorities to keep:-

*Registers of persons seeking to acquire land to build a home*

- 1) Each relevant authority must keep a register of
- a) individuals, and
  - b) associations of individuals (including bodies corporate that exercise functions on behalf of associations of individuals), who are seeking to acquire serviced plots of land in the authority's area in order to build houses for those individuals to occupy as homes.

**Housing and Planning Act 2016**

- 2.4 The Housing and Planning Act 2016 (c. 22); Part 1 —New homes in England: Chapter 2 —Self-build and custom housebuilding, this imposed: A Duty to grant planning permission:
- 1) This section applies to an authority that is both a relevant authority and a local planning authority within the meaning of the Town and Country Planning Act 1990 ("the 1990 Act").
  - 2) An authority to which this section applies must give suitable development permission in respect of enough serviced plots of land to meet the demand for self-build and custom housebuilding in the authority's area arising in each base period.
  - 6) For the purposes of this section—
    - a) the demand for self-build and custom housebuilding arising in an authority's area in a base period is the demand as evidenced by the number of entries added during that period to the register under section 1 kept by the authority.

### **3.0 DUTIES OF LOCAL PLANNING AUTHORITIES**

- 3.1 The Act, therefore, which came into force on 1 April 2016, requires local planning authorities to compile a REGISTER of persons seeking to acquire land to build or commission their own home and to have regard to that register when carrying out their planning housing, land disposal and regeneration functions.
- 3.2 The Housing and Planning Act 2016 requires local planning authorities to ensure that there are sufficient serviced permissioned plots consistent with the local demand on their custom build registers.
- 3.3 It can be seen that these Acts placed a duty on local planning authorities to keep a Register of people who are seeking to acquire serviced plots. Local authorities must provide sites to meet the needs of applicants on its Register within three years and in addition local planning authorities are encouraged to support self build and custom build provision within their Local Plans. Most local authorities do not have any land suitable for self build or custom build. Only developers can provide the sites.

### **4.0 SELF BUILD AND CUSTOM BUILD HOUSING**

- 4.1 Self build and custom build housing is housing built by individuals or groups for their own use, either by building the home on their own or by working with builders.
- 4.2 There are various types of self build and custom build projects:-
- Individual self build or custom build where an individual purchases a plot and builds a house to live in. They may do some or all of the work themselves or employ a builder to oversee the work;
  - Developer led custom build is where a developer divides a larger site into individual plots and provides a design and build service to purchasers.
- 4.3 It is recognised that people seeking plots aspire to provide the highest standards of energy efficiency. They are also wanting to be able to influence the design and layout so that they have a bespoke design. This allows them to have a kitchen for a chef; or a separate kitchen and dining room or a combination.
- 4.4 It is a legal requirement of the Act to provide full services to the plot frontage.

#### **A serviced plot**

- 4.5 A serviced plot is defined as a parcel of land with legal access to a public highway, and at least, waste foul drainage and electricity supply at the plot boundary or can be provided with those things in specified circumstances or within a specified period.
- 4.6 Connections for electricity, water and waste water means that the services must either be provided to the boundary of the plot so that connections can be made as appropriate during construction or adequate alternative arrangements must be possible such as the use of a cesspit rather than mains drainage.

## **Exemption from the Community Infrastructure Levy (CIL)**

- 4.7 Self build and custom build housing is exempt from making the payment of CIL provided that certain requirements are met including:-
- Housing built or commissioned by a person must be occupied by that person as their sole or main residence for at least 3 years.
  - It is necessary for self builder to declare that their development is intended to be self build prior to the commencement of the development.

## **5.0 THE BACON REVIEW**

5.1 Richard Bacon MP is one of the UK's biggest champions of self-build and custom-build housing. The Conservative MP for South Norfolk founded an All-Party Parliamentary Group in 2013 to promote the practice, and in 2015 pushed through a law to facilitate it.

5.2 It was evident that the Act was not achieving the level of provision of plots that had been expected. The then Prime Minister, Boris Johnson, requested an independent review. This was commissioned in April 2021 and was led by Richard Bacon MP. He said that:-

**Building your own home shouldn't be the preserve of a small number of people, but a mainstream, realistic and affordable option for people across the country.**

5.3 Richard Bacon made recommendations in his report to government on how to support growth in all parts of the custom and self build market, helping to boost capacity and overall housing supply in our housing market. These aim to support more competition and innovation within the housebuilding industry, as well as our Net Zero housing ambitions.

5.4 The objective of the recommendations is to boost delivery of plots from the current 13,000 per annum to between 30,000 and 40,000. Research by Nationwide showed that 61 per cent of the UK population would like to self or custom-build a home at some point in their lives.

5.5 Richard Bacon believes that:-

**In a functioning housing market, consumers need to have real choice, and there needs to be relatively low barriers to entry, so that new suppliers can come into the marketplace to meet demand.**

## **The Recommendations**

5.6 The review, entitled "House: How Putting Customers in Charge Can Change Everything" makes six key recommendations:

- A greater role for Homes England, including the creation of a new Custom and Self Build Housing Delivery Unit to support the creation of serviced plots;
- Raise awareness of self build and show by 'doing', with the creation of a custom and self build 'Show Park' and by strengthening existing legislation to mandate the wider publicity of the 'Right to Build' Registers.
- Reignite the Community Housing Fund and create more opportunities for communities to build, such as through a Self-Help Housing Programme and a Plot to Rent Scheme.

- Promote “green homes” and the increased use of Modern Methods of Construction (MMC)
- Align custom and self build changes in particular through making focused changes to the Right to Build legislation to ensure that it achieves its objectives.
- Iron out tax issues to create a level playing field between self built homes and speculatively built homes.

5.7 Robert Jenrick, the then Secretary of State for Housing, Communities and Local Government stated that:-

**We know that self build and custom builders deliver high quality well designed homes that are energy efficient and welcomed by local communities.**

### **The Levelling-Up and Regeneration Bill**

5.7 The Levelling-Up and Regeneration Bill is progressing through parliament. There are innumerable clauses but the Bill specifically supports self build and custom build housing. Minor amendments to the 2015 Act are proposed to increase the provision of plots. Chapter 6; paragraph 115 states that:-

Duty to grant sufficient planning permission for self-build and custom housebuilding; In section 2A of the Self-build and Custom Housebuilding Act 2015 (duty to grant planning permissions etc)— (a) in subsection (2)— (i) omit "suitable"; (ii) for "in respect of enough serviced plots" substitute "for the carrying out of self-build and custom housebuilding on enough serviced plots"; (b) omit subsection (6)(c).

## **6.0 WHY IS THE PROVISION OF PLOTS SO LOW**

6.1 Local planning authorities have been very resistant to the provision of plots. Initially, some authorities proposed very high fees for people to Register. There is no attempt to encourage people to register. On the contrary, authorities have required a “Local Connection Test” which only permits people in the District to register. Plots are supposed to be provided within three years of registration. There is no penalty for failing to meet the demand on the Register in any base period.

6.2 This means that people seeking a plot in a specific area are excluded and area such as London Boroughs where there is very high demand have little prospect of obtaining a plot. There is an organization promoting self build and custom build housing called the National Association of Custom Self Build (NASCBA). This organization has published information on the data provided by local authorities in respect of its Registers. The highest level of registrations are in the cities where there are the lowest number of plots available (NACSBA: Report 2020).

6.3 Councils do not offer genuine sites and some count windfalls as opportunities when they are not actually available on the market. Many authorities seek 5%-10% of allocated sites to include plots but this is very unpopular with developers who do not want people doing their own thing in their estates. It is claimed that it makes sales more difficult and it creates conflict where different builders are working within the new estate.



- 6.4 Authorities are reluctant to publish data. The level of interest on Registers is difficult to obtain. Authorities claim that they are unable to reveal details because of issues of privacy. It is difficult to obtain details of where plots have been made available. Some require details of people's finances to prove that they are in position to build the house before they can register. On the other hand, it is known that it is possible to build cheaply over a period of time by craftsmen and architects.
- 6.5 The principal reason why authorities are so reluctant to meet the demand is the loss of monies from the Community Infrastructure Levy. It is ironic that the market for plots is strongly skewed towards the upper and most expensive part of the market where self and custom builders could most comfortably pay the levy.

## **7.0 THE MARKET PLACE**

- 7.1 The market is strongly skewed towards the wealthy and middle aged. 64% of the self and custom builders are over 55 years of age. They are typically seeking single plots especially in rural locations. The shortage of plots in built up areas has led to the demolition of large houses to create an even larger bespoke house.
- 7.2 Developers and promoters of plots seek sites that fall beneath the affordable housing threshold. Sites of ten or less than a hectare avoid the need to make provision. Two sites in Fareham that breach this threshold have been required to make financial contribution considerably in excess of £150,000 for just 7 (greater than a hectare) and twelve units (above 10) respectively.
- 7.3 As a consequence, small sites can fetch very high figures. One site for six plots in Greenaway Lane, Warsash is believed to have been sold for over £450,000 each. It is claimed that four of the eight plots in Brook Avenue, Warsash were sold for £750,000 prior to launch (Chimney Pots Estate Agents). There is no need for the purchasers to have a 'local connection' and, therefore, they can be purchased by people from other Districts. Thus, there is unlikely to be any reduction in the people on the Register from the sale of these plots.
- 7.4 Self build and custom build plots often offer greater value than traditional ones. However, they cannot compete with large housebuilders because the development of a large self build/custom build scheme requires substantial sums to pay for infrastructure to meet the requirements of providing service plots in advance of sales. Furthermore, the sale of the plots can take a considerable period and therefore profits can take a long time to achieve. It is expedient to take a smaller sum immediately than a larger sum that has some uncertainties.
- 7.5 On large sites, custom build is preferred because it is desirable to coordinate the designs and use similar materials. It is also important to ensure that the building work is organised carefully to avoid conflict. Self builders often seek unique designs and the use of contemporary materials more suited to single sites or larger sites.
- 7.6 Planning applications for sites for plots and planning appeals for self and custom build schemes do not gain any weight. The only way in which this shortage of affordable plots for more people is to allocate large sites. Perhaps these sites should offer to pay the Community Infrastructure Levy. Larger sites would be required to provide affordable housing to the

Council's requirements. The benefits to the local community is clear while the benefits of small schemes are confined to the land owner and the developer.

7.7 The National Association of Custom Self Build (NASCBA) has point out that:-

**Custom and Self build houses are built by SME housebuilders, who feed into local economy and train local people.**

## 8.0 CONCLUSION

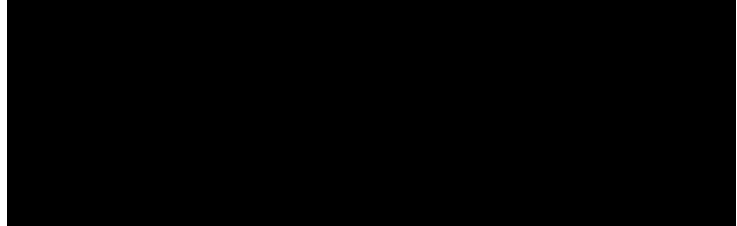
- 8.1 It is evident that provision of plots for people aspiring to build a self or custom build house is severely restricted in spite of strong government support. Local authorities appear to be reluctant to support the concept. Although they are required to maintain Registers and to meet the demand, authorities create obstacles in order to limit registrations.
- 8.2 The provision of plots is not transparent. Sites are counted that are not genuinely available to purchasers. Councils do not invite residents to Register and surveys indicate that people are not aware of the need to register.
- 8.3 The most significant reason for the Councils' reluctance to promote self and custom build housing is the loss of revenue from the Community Infrastructure Levy. However, the purchasers that benefit most from the exemption are the purchasers of plots that command the highest prices. So it is the purchasers who could most readily pay the levy that benefit. The removal of the exemption from the levy seems desirable.
- 8.4 The allocation of sites specifically for plots would have the benefit of meeting the demand for a wider range of people and it would have the benefit of meeting the appropriate level of affordable housing. The plots should not be subject to a "Local Connection Test". People should be able to decide where they want to live.
- 8.5 There is also a need to make funding available to facilitate the provision of infrastructure. The provision of serviced plots is a significant cost that has to be made upfront.
- 8.6 There is a clear need to make changes to the Planning Policy Guidance and the National Planning Policy Framework to ensure that the benefits of self and custom build housing is strongly supported.
- 8.7 It is evident that there is strong government support for self/custom build housing. There are sound reasons to support the SME builders. They support the local economy and can provide training in the relevant skills. For these reasons, it is considered that the Local Plan should provide clear policy guidance to encourage this sector.

We look forward to East Hampshire District Council taking these points into consideration.

Yours sincerely



**Hampshire Chamber of Commerce**

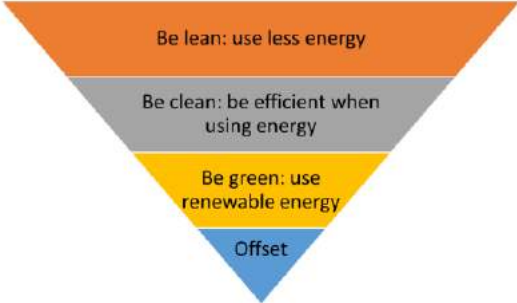


**Hampshire Chamber of Commerce**

## East Hampshire District Council Local Plan 2021-2040: Regulation 18 Issues & Priorities (Part 1) Consultation

*Hampshire County Council, as a landowner, offers the following comments, in the spirit of its duty to cooperate, in line with the Town Planning (Local Plan) Regulations 2012 and to ensure future East Hampshire District Council's development plan documents would be positively prepared, justified, and consistent with national policy.*

Consultation Questions / Ref.	Object / Support / Comment	HCC Landowner Response
<b>Climate Change</b>		
<p><b>CLIM1</b> Do you agree that new development should avoid any net increase in greenhouse gas emissions, wherever practicable? (Y/N)</p>	<p><b>Support.</b></p>	<p>As landowner, Hampshire County Council supports the District Council's priorities for tackling climate change and encouraging the reduction of greenhouse gas emissions within its local plan. This aligns with the County Council's <a href="#">Vision for Hampshire 2050</a> to develop and promote a focus on embedding climate resilience and mitigation across key policies and sectors, working with communities across Hampshire.</p> <p>The County Council agrees that 'new development should avoid any net increase in greenhouse gas emissions, wherever practicable'. The County Council as a landowner (which delivers public-built assets, such as new schools), is supportive of this pragmatic approach as it provides flexibility for new development which could be subject to various challenges such as site-specific constraints and viability issues.</p>
<p><i>A best-practice definition of 'net-zero carbon' development is considered to be one whereby:</i></p> <ul style="list-style-type: none"> <li>▪ <i>The energy consumed by a building's occupants is taken into account and reduced as far as possible. This would mean considering all of the</i></li> </ul>	<p><b>Support.</b></p>	<p>The County Council in its role as a landowner and developer of operational public-built assets, welcomes a clear definition for 'net zero carbon development' to build consensus and understanding across the built</p>

Consultation Questions / Ref.	Object / Support / Comment	HCC Landowner Response
<p><i>energy consumed, not only that which is regulated by the Government's Building Regulations;</i></p> <ul style="list-style-type: none"> <li>▪ <i>The remaining energy demand is met with the equivalent amount of renewable power generation, either onsite or offsite;</i></li> <li>▪ <i>The remaining carbon dioxide emissions that are associated with a building (e.g. through making or obtaining its building materials) are estimated and reduced, wherever practicable.</i></li> </ul> <p><b>CLIM 3.</b> Do you agree that the Council should define 'net-zero carbon development' in this way? (Y/N)</p> <p><b>CLIM3a</b> If you answered 'no', how should the definition be improved?</p>		<p>environment industry in policy context of the forthcoming local plan.</p> <p>The County Council broadly agrees with the proposed definition and suggests the District Council may wish to consider the approach to defining net-zero carbon development as shared by the UK Green Building Council's <a href="#">Net Zero Carbon Buildings: A Framework Definition</a> (April 2019).</p>
<p><b>CLIM4</b> In the future, should the Council's policies on the design of new buildings focus more strongly on tackling climate change in accordance with the energy hierarchy? (Y/N)</p>  <p><b>CLIM4a</b> If you answered 'no', how should we balance the design of new buildings with the need to tackle climate change?</p>	<p><b>Support.</b></p>	<p>The County Council in its capacity as a landowner supports the idea that the forthcoming local plan's design policies should focus more strongly on tackling climate change in accordance with the energy hierarchy. The proposed energy hierarchy aligns with the 'carbon hierarchy' of key principles of the County Council's <a href="#">Climate Change Strategy 2020-2025</a>.</p> <p>To avoid the future design policies being too restrictive, which may impact on delivery of new developments or housing, the County Council suggests the District Council ensures an element of flexibility is included in the relevant design policies or supporting policy texts.</p>

Consultation Questions / Ref.	Object / Support / Comment	HCC Landowner Response
<b>Call-for-Green sites</b>		
<p><i>Call for Sites - 'Green Sites' - These include Suitable Alternative Natural Greenspace (SANG), Biodiversity Net Gain and/or Nutrient Neutrality mitigation sites.</i></p> <p><b>CFS2</b> Please describe where the land is and provide an address if possible (e.g. street name, local area, what landmarks are nearby)</p> <p><b>CFS2a</b> Please upload any maps or photos of the land you are suggesting to our <a href="#">digital engagement platform</a>.</p>	<p><b>Comment.</b></p>	<p>Hampshire County Council in its role as a landowner highlights land at Stanford Grange Farm as a submission for the call for Green Sites. The land at Stanford Grange Farm is located to the east of Hollywater Road. The land is considered to have potential for provision of SANG and biodiversity net gain (BNG) credits.</p> <p>The availability of any land would be on commercial terms by agreement with the District Council and other landowners. It would also be subject to future approval by the County Council's members. The County Council would welcome further discussion with the District Council about the potential of the land as a 'green site' and mechanisms to ensure the County Council secures suitable commercial terms.</p>



Planning Policy Team  
East Hampshire District Council

Hampshire 2050  
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Enquiries to

[Redacted]

My reference

Direct Line

[Redacted]

Your reference

Date

17 January 2023

E-mail

[Redacted]

Dear Sir,

**East Hampshire District Council Draft Local Plan (2021 – 2040) - Issues & Options**

Thank you for consulting Hampshire County Council on the East Hampshire District Council Local Plan Issues & Options. The County Council provides the following response in its capacity as the local highway authority, the minerals and waste planning authority, the waste disposal authority and also as an adult services provider. The full technical responses are set out as appendices.

I trust that these comments are of assistance to you. If you wish to discuss any of the comments raised, please do not hesitate to contact my colleague [Redacted]

Yours faithfully,

[Redacted Signature]

Hampshire 2050

Director of Hampshire 2050

[Redacted Name]

## **Appendix 1: Local Highway Authority**

### **Development Strategy & Spatial Distribution**

#### **Settlement hierarchy & accessibility scoring**

The County Council broadly welcomes the approach that has been taken to identifying the settlement hierarchy. The location of a new development has a significant impact on the ability of the planning system to deliver sustainable development. The accessibility and connectivity of a site by active travel and public transport plays a critical role in creating quality places for people, not cars.

The County Council supports the approach taken for this Regulation 18 (Part 1) document to identify zones across the district that meet the 20-minute neighbourhood criteria. The use of these zones to inform the settlement hierarchy and to identify the most sustainable locations for new residential development is to be supported.

However, it may be worthwhile undertaking a further mapping exercise to develop a district wide transport accessibility/connectivity appraisal tool to complement the 20-minute neighbourhood assessment work. This is because the current 20-minute mapping exercise does not provide enough information to enable the identification of the most sustainable locations for larger development proposals. Larger development proposals may be able to deliver the additional amenities and services needed to create new 20-minute neighbourhoods, or at least enable settlements with limited existing services to meet the criteria to become 20-minute neighbourhoods.

There is also a need to consider the accessibility and connectivity of sites for non-residential land uses such as employment. It may not be appropriate to locate larger commercial or employment sites in residential areas and locations close to rail stations or corridors with good public transport services may be more appropriate.

The transport accessibility/connectivity tool will also be able to show how planned or proposed improvements to active travel and public transport infrastructure will impact the accessibility score of a location. For example, it could show how accessibility scores for locations around Horndean and Clanfield might change if the Star Bus Corridor and the South East Hampshire Rapid Transit (SEHRT) route infrastructure was extended north from Waterlooville.

The accessibility of a location to employment by public transport and active travel modes is particularly important and differs significantly for settlements in East Hampshire. According to the transport connectivity evidence base work undertaken for the Local Transport Plan (LTP) 4, the percentage of jobs accessible by public transport in Petersfield is 11%, whereas in Alton it is 7% and in Bordon it is only 3% (2016 data - LTP4 Evidence Base Paper – Transport Connectivity Analysis).



The 'jobs to population' ratio of a settlement also varies significantly across the district and has significant implications for future trip generation and the number of external longer distance trips made to access jobs. For example, the percentage of jobs to population in Alton is 52% whereas in Bordon it is only 23% (2016 figures - LTP4 Evidence Base Paper – Transport Connectivity Analysis). This suggests that a much higher number of residents in Bordon may need to travel externally to access their future place of work compared to Alton.

This should have an influence on the scale of future housing growth and/or the number of jobs and employment to be allocated to Bordon. The County Council note that several employment-led developments are already proposed or under construction in Bordon and Whitehill and therefore the figure of 23% is already likely to be out of date.

### **Accessibility scoring methodology and ranking of settlements**

Whilst the approach taken in the accessibility scoring methodology and ranking of settlements is broadly supported, the County Council has the following comments and queries on the current methodology that it considers would enhance the methodology and make for a more robust assessment:

- Employment clusters – question as to whether the score weighting accurately reflects locations with the largest number of employment sites;
- Secondary schools – considering the transport and cost implications associated with these schools the score weighting may need reviewing;
- Secondary schools – is there a need to factor in the capacity of the school and ability for it to expand and opportunities to provide a new secondary school?;
- 1200 metre walking distance rather than 800 metres – the justification for this change in distance needs to be clearly set out and it is questioned whether the 20-minute neighbourhood terminology will still be appropriate. A walking speed of 4.8 kilometres per hour (3 miles per hour) is commonly used for the purposes of transport planning within England and is based on the Manual for Streets (MfS) published by the Department for Transport (DfT). Para 4.4.1 of MfS states that an average person walks 800 metres in 10 minutes. The value provides a consistent value that is used throughout accessibility assessments, including the Department for Transport's Journey Time Statistics. The Chartered Institution of Highways and Transportation (CIHT) states that a 'Walkable Neighbourhood' is typically characterised as having a range of facilities within 10mins walking time or 800 metres distance: [Planning for Walking LARGE\\_DOC\\_V1.indd \(ciht.org.uk\)](#). If the District Council is intending to change this criteria there will need to be robust evidence to justify it, especially if 'as the crow flies' radial distances are being used rather than walking isochromes;

- The 1- or 2-point scoring method for accessibility to rail and bus services is a simplistic methodology considering the range of possible public transport services that will be available in different locations;
- Consideration should be given to the use of real-world walking/cycling isochromes instead of a direct 'as the crow flies' radial lines. The use of 'as the crow flies' radial lines will not be very reflective of realistic walking times if for example there is severance created by railway lines or motorways;
- Is the District Council intending to assess the potential of a location to deliver additional services, amenities & local jobs?;
- Is the District Council intending to assess the modal shift potential of a site, i.e. how easy will it be to improve the accessibility of a site to rail stations, bus services, employment sites or local centres through the provision of new connections and infrastructure?; and
- Will there be consideration of the potential of a site to integrate with/enhance public transport on a key corridor serving larger centres e.g. South East Hampshire Rapid Transit (SEHRT)/Star Corridor or the A31.

The County Council also recommends that the District Council consider the following topics and criteria to inform any future accessibility appraisal:

- Public transport services to hospitals;
- Further education facilities;
- Early years childcare facilities;
- Cycling isochromes;
- Existing mode share data;
- Car ownership levels;
- Internet connectivity; and
- Linked settlements and shared services via active travel networks.

For the Reg 18 Part 2 document the County Council will expect the existing transport network capacity constraints, highway congestion and access to the Strategic Road Network (SRN) to be considered alongside any assessment of the impacts from sites and the settlement hierarchy.

## **Development Strategy (DEV1-2) – Options to inform a strategy**

### *Option 1 – Disperse new development to a wider range of settlements*

From a transport sustainability perspective, the County Council welcome modest housing growth and development dispersed across market towns and rural settlements if it helps support increased services in these locations which in turn improves self-containment of the communities. Any proposed development and housing growth in these locations must be supported by active travel infrastructure improvements and the development of a rural transport strategy. Consideration

should be given to innovative rural mobility hubs and the Velo-City concept of connecting services in linked settlements by active travel routes.

Any significant allocations of housing growth in lower tier smaller settlements and villages (Tier 3 and 4) without adequate services or amenities are unlikely to be supported. This is due to the distances needed to travel to services and the absence of public transport in these areas resulting in an overreliance on unsustainable private car trips.

There is some doubt as to whether this option will be better at mitigating greenhouse gas emissions relating to transport compared to option 2 as is currently suggested in the document.

#### *Option 2 – Concentrate new development in the largest settlements*

From a transport sustainability perspective, the County Council is likely to support housing growth and development concentrated in the largest settlements with existing services that can be accessed by active travel. This growth should be planned to ensure it delivers increased services which in turn improves self-containment of the settlements. Any proposed development and housing growth in these locations will need to be supported by active travel and bus infrastructure improvements and the development of a transport strategy for each settlement.

It could be argued that it will be easier to improve accessibility to services by walking and cycling in this option rather than in option 1, due to the concentration of sites facilitating more funding to be secured for infrastructure improvements. There is also some doubt as to whether this option will be worse at mitigating greenhouse gas emissions relating to transport compared option 1 as is currently suggested in the document.

#### *Option 3 – Distribute new development by population*

Whilst this option seems logical and the suggested spatial scenarios are expected to be similar to option 2, further information is required to better understand the spatial strategy approach before providing comment.

#### *Option 4 – Concentrate development in a new settlement*

From a transport sustainability perspective the County Council would be unlikely to support a stand-alone new settlement of approximately 1,500 homes because it would not be of a large enough scale to deliver and support enough new services and infrastructure to make the settlement sustainable and self-contained. Evidence from Garden Villages elsewhere in the country suggests that a new stand-alone development will only start to become sustainable from a transport perspective if it is large enough to support a new secondary school.

From a transport sustainability perspective Hampshire County Council might be more likely support a new development of 1,500 homes if it is a contiguous expansion/extension to an existing town that already has a good range of services

and facilities, including a secondary school, which can be easily accessed by active travel from the proposed site.

#### **Local Transport Plan 4 - General comments relevant to all options**

The draft LTP4 Policy DM 1 (*Integrate transport and strategic land-use planning to reduce the need to travel*) sets out the required characteristics that strategic sites would be expected to have in order to be supported in transport terms:

- are 'accessible' or 'highly accessible';
- offer a mix of uses;
- achieve appropriate density of development;
- have good public transport access;
- achieve the necessary critical mass of development needed to encourage self-containment and support viable public transport services and frequencies, in both new settlements and urban extensions; and
- have been assessed for their transport carbon impacts, are compliant with carbon neutrality targets, or where this is not achievable, the impact is offset; as defined in development planning guidance.

The County Council suggests that the spatial strategy for the emerging Local Plan should be informed by the ability of sites to achieve high active travel mode shares through the delivery of the above characteristics.

Development should have a density of at least 40 dwellings per hectare to support a sustainable bus service (40dph) and greater than 60 dwellings per hectare to support the extension of bus rapid transit services and associated infrastructure.

Opportunities for the delivery of rural mobility hubs should also inform emerging spatial strategies and the potential for densification around these sites and existing transport interchanges such as rail stations should also be considered.

As per the emerging LTP4 Policy DM2 (support proactive masterplanning of new development sites for high quality neighbourhoods), the following principles and strategies should be factored into decisions regarding the future spatial strategies for the district:

- Emerging Hampshire Movement & Place Framework;
- Road User Utility Framework;
- Low traffic neighbourhoods – minimising through traffic in residential neighbourhoods and designing for active travel over the car;
- New accesses onto A roads or the principal road network or traffic sensitive streets will only be supported where the strategic flow of traffic is prioritised and all other reasonable options have been considered;
- Parking strategies and other travel demand management tools that lock in sustainable travel behaviours;

- User and modal hierarchy;
- Street and access hierarchy;
- Healthy Streets Approach;
- Future proofing access points for adjacent planned developments;
- Shared mobility schemes and transport services focused on rural mobility hubs; and
- New schools to be planned so that they are close to local centres and design out the traditional school gate congestion issues and facilitate safe and comfortable journeys by active modes. Refer to latest County Council guidance on planning for new schools in developments.

### **Infrastructure & CIL (INF1)**

The County Council welcome the following additions to the definition of 'Infrastructure' list for transport:

- Parking (lining/signing/car parks/P&R/Park&Stride);
- Bridges;
- Structures;
- Drainage;
- Roads and streets;
- Public Rights of Way;
- Shared mobility schemes; and
- Electric vehicle charging infrastructure.

The County Council welcome the consideration of these topics in the transport section of the Infrastructure Technical Paper for the Regulation 18 Part 2 document:

- Local Cycling and Walking Infrastructure Plans network and Public Rights of Way network;
- Public transport infrastructure improvements;
- Place making proposals in town centres;
- Potential for expansion of the South East Hants Rapid Transit (SEHRT) and the Star Corridor for the Southern Parishes;
- Existing bus and transport services on the A31 corridor;
- Rural mobility hubs or other innovation rural transport proposals;
- Development of Transport and Movement Strategy for each of the Tier 1 settlements;
- Transport accessibility appraisal of the whole district; and
- Highway pinch points and congestion hotspots.

### **National Highways Responsibilities**

It may be worthwhile mentioning in the Local Plan or background evidence papers that National Highways is the highway authority for the A3(M) and A3 dual carriageway and reference DfT Circular 01/22.

## **Appendix A**

There is a dedicated appendix providing comprehensive information on rail services and stations in the district however there is no similar level of information or appendices for bus services, walking, cycling and other transport modes. The County Council welcome that level of information also being presented.

## **Flood Risk**

The County Council would welcome reference to surface water flooding and the where necessary the need to upgrade highway drainage system and incorporate SuDS alongside minimising runoff from developments onto the public highway.

## Appendix 2 – Minerals and Waste Planning

Hampshire County Council, as the Minerals and Waste Planning Authority (MWPA), would like to promote the inclusion of the Hampshire Minerals and Waste Plan (HMWP) in the East Hampshire Local Plan. Currently, there is no mention of the HMWP in the Issues & Options document, nor is there mention of safeguarding mineral resources, or the need to push waste up the Waste Hierarchy.

The County Council would like to see the inclusion in the emerging Local Plan of how East Hampshire plans to reduce waste production across the Local Plan area and how EHDC are preparing waste for re-use. These are the top two levels of the Waste Hierarchy for which Local Authorities are responsible.

As mentioned above, the East Hampshire Local Plan - Issues & Options document does not include reference to the safeguarding of mineral resources or infrastructure, while there are currently no housing sites proposed for allocation, Hampshire County Council request that any proposed sites are assessed against the safeguarding policies of the currently adopted Hampshire Minerals and Waste Plan (2013). These being Policy 15 (Safeguarding – mineral resources), Policy 16 (Safeguarding – minerals infrastructure) and Policy 26 (Safeguarding – waste infrastructure).

Hampshire County Council ask that should a site fall within the buffer zone of a safeguarded mineral or waste site, as defined under Policies 16 and 26, that this is listed as a constraint and that consultation with Hampshire County Council, as the MWPA, will be required as well as potentially a safeguarding assessment report. Safeguarded site mapping information can be provided upon request.

Hampshire County Council ask that should sites come forward that are over 3 hectares in area and that are partially or wholly within the Minerals Safeguarding Area, as defined under Policy 15 of the HMWP, that these sites' constraints listing contains the requirement for the production and submission of a Minerals Safeguarding / Resource Assessment prior to or as part of any planning application to Hampshire County Council, as the MWPA. Further information on the safeguarding of minerals and waste in Hampshire can be found in our [Minerals and Waste Safeguarding in Hampshire Supplementary Planning Document](#).

Hampshire County Council is available to discuss minerals and waste safeguarding issues further with East Hampshire District Council if required. Please get in contact via [planning.policy@hants.gov.uk](mailto:planning.policy@hants.gov.uk) or alternatively contact [planningconsultation@hants.gov.uk](mailto:planningconsultation@hants.gov.uk)

### **Appendix 3: Waste Disposal Authority**

Hampshire County Council and local authorities in Hampshire are committed to delivering recycling and waste management services which place emphasis on the waste hierarchy with waste prevention as the best outcome. The County Council notes the adoption in April 2002 of the East Hampshire climate change and sustainable construction SPD document which incorporates the waste hierarchy in Section 7.

The County Council take this opportunity to reiterate that all Project Integra Partners, including the East Hampshire District Council, formally approved the Project Integra Joint Municipal Waste Management Strategy (JMWMS) in May 2022, and in doing so jointly endorsed the move to a twin stream recycling system that will see kerbside dry recycling being delivered in two different streams from 2025 onwards. The first stream will be a container mix (can, tins, plastic bottles, aerosols, pots, tubs, trays, cartons and glass) and the other a fibre mix (paper and card); this is to increase the segregation of materials that could contaminate each stream and lead to lower quality material be captured.

In addition to this it is expected that all waste collection authorities will be required, by the Environment Act 2021, to provide a separate weekly food waste collection service to all properties and many will also offer a green garden waste collection. Therefore, consideration for the adequate and safe storage of waste containers at future housing sites should be considered as an important feature of their design and masterplanning.

The County Council currently operates three household waste recycling centres (HWRCs) in East Hampshire District; Petersfield, Bordon and Alton. These provide a key role in diverting household waste from disposal, reusing, recycling or recovering an average of 84% of the material brought to them in 21/22.

The Petersfield HWRC is small and of outdated single level design, and while the Alton and Bordon HWRCs are both split-level (i.e. there are no steps to access the waste containers and the servicing yard is in a separate lower area), all three sites have their limitations. Alton HWRC is small, and Bordon HWRC is nearing capacity with the significant new housing being provided in the area. The Bordon and Petersfield HWRCs have been subject to redevelopment studies in the past, but no suitable proposals or alternative locations were identified and consequently there are no plans to redevelop them at present.

The County Council is available to discuss any waste disposal issues further with East Hampshire District Council if required. Please get in contact via [waste.management@hants.gov.uk](mailto:waste.management@hants.gov.uk) or alternatively contact [planningconsultation@hants.gov.uk](mailto:planningconsultation@hants.gov.uk)



## **Appendix 4: Climate Change**

The County Council is pleased to see that the issue of climate change is being addressed via a range of strategic questions seeking input on how best to respond to the challenge of climate change. The County Council's Climate Change Framework for Strategic Programmes (2020 – 2025) sets out the mitigation and resilience programmes which the County Council will be pursuing. These strategic programmes have been designed to deliver outcomes to reach the County Council's targets in 2050 and are therefore very long term and extensive in nature.

The County Council is therefore supportive of the approach taken in the Issues & Options document seeking input on key climate changes issues via Climate Change (CLIM1-2), Climate Change (CLIM3) - Defining 'Net Zero Carbon Development', Climate Change (CLIM4) - The Energy Hierarchy as an approach to mitigation, Climate Change (CLIM5) – Criteria for adapting and tackling climate change and Climate Change (CLIM6) – Living locally & 20 minute neighbourhoods which in principal are all seeking to develop policies to help mitigate and adapt to climate change and which the County Council considers will align with the key milestones set out in the building and infrastructure theme of the County Council's Climate Change Framework for Strategic Programmes.

The County Council also notes the existing green infrastructure and green corridors that are listed in the Local Plan as part of the evidence base and the County Council is also supportive of the call for green sites as part of this local plan consultation.

### **Climate Change (CLIM1-2)**

Surface transport is the largest contributor to UK domestic greenhouse gas emissions (50%) and the emerging Local Plan must ensure that new development contributes to the decarbonisation of the transport network and reduces the need to travel by car.

The integration of planning and transport is key to achieving net zero goals. If a development is car dependent because it is located in the wrong place, then it can never be sustainable and will be impossible to achieve net zero.

The emerging Local Plan should facilitate the decarbonisation of all transport modes by enabling the switch to electrification and zero emission fuels. New development must provide appropriate levels of futureproofed infrastructure and opportunities for recharging and refuelling vehicles no matter the mode.

The emerging Local Plan should aim to ensure that any new infrastructure results in a positive environmental legacy and is futureproofed to be resilient to climate change.

The County Council endorse the approach to reducing the demand for carbon intensive trips by making it easier for residents of new developments to live locally and access services close to where they live by linking new homes to local jobs, shops, education, leisure and other facilities in 20-minute walkable neighbourhoods

where active travel is prioritised over the motor vehicle for local trips. The emerging Local Plan must also ensure that new development provides a genuine choice of transport modes by designing it around and integrating it with existing active travel connections, and delivering new and improved public transport provision, and accessible, convenient and safe active travel connections to achieve net zero growth.

The County Council recognises that in a rural district like East Hampshire it is challenging to deliver a genuine choice of transport modes in the form of traditional public transport. The emerging Local Plan should investigate ways of providing increased opportunities for walking, cycling, and new innovative ways of moving people and goods bespoke to rural areas.

### **Climate Change (CLIM3) - Defining 'Net Zero Carbon Development'**

There is no specific reference to transport emissions associated with both the construction and occupation of new development. Paragraph 6 does state that transport emissions during construction are considered non-operational emissions or 'embodied' or 'whole life cycle' emissions. This does not recognise that traffic movements associated with the construction phase includes more than just the transportation of building materials to the site. There is also no reference to transportation emissions associated with occupation of the development.

### **Climate Change (CLIM4) - The Energy Hierarchy as an approach to mitigation**

The County Council welcome reference to the Carbon Management Hierarchy (AVOID-REDUCE-REPLACE-OFFSET) principles outlined in the emerging Local Transport Plan 4 (LTP4) Policy C4 (page 66) which includes delivery of the following interventions:

- avoid carbon-intensive activities by reducing the need to travel, and looking for opportunities to 'live locally' and undertake shorter trips;
- reduce dependency on the private car by providing better walking, cycling and public transport choices, and use our vehicles more efficiently; and
- replace our petrol and diesel vehicles (which emit CO<sub>2</sub>) with zero emission vehicles;

Policy C4 of the emerging LTP4 also refers to working with local planning authorities to require transport-related carbon emissions associated with developments to be estimated and assessed at the site selection and planning approval determination stages. The County Council would welcome further discussions as to whether there is still an opportunity to reflect this in the emerging Local Plan.

A coalition of sub national transport bodies have commissioned consultants to develop a carbon tool that will allow local areas (at district or greater geographical area) to model carbon pathways and emissions from transport. The tool will most likely have a web portal access system allowing any organisation to access it and run different development or policy intervention scenarios. The County Council

expect the tool to be available in early 2023 and for it to have useful application as part of local plan making process. It is currently in development and testing phase.

#### **Climate Change (CLIM5) – Criteria for adapting and tackling climate change**

The key strategic and development management policies for ensuring new development helps to adapt to, and tackle climate change should be set out in the Local Plan with more detailed site-specific requirements and design criteria set out in future neighbourhood plans and local design codes.

#### **Climate Change (CLIM6) – Living locally & 20-minute neighbourhoods**

The County Council endorses the 'living local' concept and the principles of 20-minute neighbourhoods which are referenced in policies C5 and DM2 of the draft LTP4.

## **Appendix 5: Adults Health and Care (which includes Older and Younger Adults)**

Hampshire County Council as a provider of Adults Health and Care (which includes Older and Younger Adults) notes that assertion from EHDC that local communities are changing, and that they are getting older within East Hampshire. The headline data from Census 2021, illustrates that there has been an increase from 2011 of 30.5% more residents aged 65+, the largest percentage increase for any age cohort. As stated by EHDC, the predicted population change from 2021-2038 for the whole district is 43.5% of 65 years and over, and in East Hampshire LPA area only this increases to 45.5%.

The County Council would therefore support a specific target in terms of number of homes for older persons accommodation to be delivered within the plan period as the increase in ageing population and health conditions associated with this group will become more prominent.

The County Council would therefore seek to ensure that specific housing needs are met for this cohort of residents to ensure independent living, dignity and sustainable accommodation can be secured within East Hampshire. Enabling a choice of specialist accommodation and supported housing for residents in a range of locations across East Hampshire will enable a continuation of community support and the sustained sense of wellbeing in a familiar place for ageing residents.

Due to this increase in the aging population for East Hampshire there is a recommended requirement for the provision of supported housing, such as Affordable Extra Care Housing both for older people, people with dementia and those with learning disabilities and physical disabilities (LD & PD).

Extra Care Housing schemes would typically be 60-80 homes, for Learning difficulties this should be between 8 – 16 homes, including 3 - 4 accessible units for people who use wheelchairs.

For Extra Care Housing these are typically a mix of 1 and 2 bed self-contained accommodation, mostly affordable housing and could be a mixture of need to include, older adults, adults with dementia, and/or adults with LD and/or PD.

Due to the likely projected increase of a long-term health issue in the population aged over 65 years, the County Council would also recommend that these units are built to wheelchair accessible standards and in line with the Hampshire County Council Design guide on Accessible Homes. This will enable residents to live independently for as long as possible.

The nature of land and buildings required to meet such needs mean that they must be carefully planned. Hampshire County Council's emerging planning obligations guidance sets out the County Council's approach to seeking to secure planning obligations towards County Council services and infrastructure where there is a demonstrable impact on that service or infrastructure created by new development which needs to be addressed including a section on Extra Care, Supported Housing and Accessible Housing.

The County Council do consider that a requirement on large sites for a percentage of new homes to be adaptable is a sensible policy requirement to incorporate in the emerging Local Plan as this will ensure that there is a range of locations and options for residents to choose from in respect of house type and tenure for residents who require adapted homes now or in the future.

The current requirement of 40% affordable homes on qualifying sites should certainly not be reduced and if possible and evidence supports an increase that would be a positive outcome, however the County Council understands that any policy will need to be based on evidence and pass the tests of soundness to be included in the Local Plan.



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

[Redacted]

Direct Dial

[Redacted]

[Redacted]

Email Address

[Redacted]

Our ref:  
Your ref:

[Redacted]

14<sup>th</sup> December 2022

Dear Sir or Madam,

**RESPONSE TO REGULATION 18 CONSULTATION – BETTER HOMES, BETTER PLACES – EAST HAMPSHIRE LOCAL PLAN**

Thank you for your email of the 21<sup>st</sup> November 2022 and the opportunity to respond to the consultation. Having considered the proposed local plan I have the following comments to make with reference to the prevention of crime and disorder<sup>1</sup>.

Section 17 of the Crime and Disorder Act 1998 (as amended) requires all local, joint and combined authorities (as well as National Parks, the Broads Authority and the Greater London Authority) to exercise its various functions with due regard to the likely effect of those functions on, and the need to do all that it reasonably can to prevent:

- a) crime and disorder in its area (including anti-social and other behaviour adversely affecting the local environment); and
- b) the misuse of drugs, alcohol and other substances in its area, and
- c) re-offending in its area and
- d) serious violence in its area

The duty imposed on an authority by subsection (1) to do all it reasonably can to prevent serious violence in its area is a duty on the authority to do all it reasonably can to –

- a) prevent people from becoming involved in serious violence in its area, and
- b) reduce instances of serious violence in its area

<sup>1</sup> In the context of this letter “disorder” includes Anti-Social Behaviour (ASB)



[www.hampshire.police.uk](http://www.hampshire.police.uk)



Deaf? Non-emergency text **07781 480999**



For crime and community information [www.hampshirealert.co.uk](http://www.hampshirealert.co.uk)





Crime and disorder are very real issues that affect all people. New development effects crime, whether within the development itself or elsewhere as a result of the development.

Left unchecked crime and disorder ruins lives and undermines communities. To provide for the safety of the individual and the community, every opportunity must be taken to reduce the opportunities for crime and disorder. The planning process is one of those opportunities.

The Government's commitment to use the planning system to reduce levels of crime and disorder are highlighted within several pieces of the planning guidance:

(i) The National Planning Policy Framework (NPPF):

Paragraph 92. Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:

- b) are safe and accessible so that crime and disorder, and the fear of crime do not undermine the quality of life of community cohesion – etc.

Paragraph 130. Planning policies and decisions should ensure that developments:

- f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

(ii) Planning Practice Guidance (PPG); Healthy and Safe Communities; Supporting Safe Communities:

- a. What is the role of planning in preventing crime and malicious threats?

- i) Planning provides an important opportunity to consider the security of the built environment, those that live and work in it and the services it provides.

- b. How can planning help achieve resilient places?

- i) Good design that considers security as an intrinsic part of a masterplan or individual development can help achieve places that are safe as well as attractive, which function well, and which do not need subsequent work to achieve or improve resilience. However good security is not only about





physical measures and design; it requires risks and mitigation to be considered in a holistic way.

- ii) Good design means a wide range of crimes from theft to terrorism are less likely to happen by making committing those crimes more difficult. It helps create safer places, infrastructure and buildings that are less vulnerable to terrorist attack and, should an attack take place, where people are better protected from its impacts. It can also reduce the cost and impact of security measures by avoiding retrospective works and enable mitigating measures to be blended into the environment.

It is clear that Central Government's intension is that the design of a development must contribute to reducing the opportunities for crime and disorder and the fear of crime.

Within the adopted East Hampshire Local Plan, Policy CP29 (design) does contain the following paragraph:

- i) be accessible to all and designed to minimise opportunities for crime and anti-social behaviour without diminishing the high quality of the overall appearance

Unfortunately, this reference makes reducing the opportunities for crime and disorder conditional on the overall appearance of the development. In our opinion it should be possible to achieve both, reducing the opportunities for crime and disorder and a high quality appearance.

Paragraph 2.4.2: of the supporting document, "East Hampshire District Local Plan 2017-2036 SUSTAINABILITY APPRAISAL INTERIM SCOPING REPORT", states:

The revised NPPF stresses that the planning system can play an important role in creating healthy, inclusive communities. Key messages include that planning policies should aim to achieve places which:

- Promote social interaction through mixed-use developments, strong neighbourhood centres and pedestrian- and cycle-friendly street layouts;
- Are safe and accessible, so crime, disorder and the fear of crime do not undermine quality of life or community cohesion;
- Enable and support healthy lifestyles, especially where this would address identified local health and well-being needs.

Whilst the need for planning policies to address crime and disorder and the fear of crime is identified within this document, it has not been carried forward to the local plan for consultation; as the other key messages are to some extent. Generally crime







and disorder are not subjects that are considered during the making of the local plan. Yet crime (and the absence of crime) will impact many of the aspirations within the new local plan; and as such reducing crime and disorder and the fear of crime should be a priority for the Local Authority.

The design and layout of a development influences the opportunities for crime and disorder. The presence of good natural surveillance of the public realm, the layout of the public realm, defensible space (especially about dwellings), appropriate connectivity and safe permeability, and good lighting will reduce the opportunities for crime and disorder and reduce the fear of crime.

Reducing crime and disorder and the fear of crime does not happen by chance it requires the right policies to be put in place. To that end we would ask that a policy which addresses the need for development to reduce the opportunities for crime and disorder and reduce the fear of crime is included within the new local plan. We would suggest a policy containing the following points:

- a) The layout of the development must reduce the opportunities for crime and disorder, and contribute to improving community safety.
- b) All development must incorporate measures to reduce the opportunities for crime and disorder, such as, but not limited to:
  - i. Good natural surveillance of the public realm
  - ii. Defensible space about buildings especially dwellings
  - iii. Appropriate levels of safe connectivity and permeability
  - iv. Lighting to the relevant British Standard

The prevention of crime and disorder and reducing the fear of crime brings a number of benefits to both the individual and the community. Low levels of crime and disorder provides a 'safe' environment within which individuals and communities are able to thrive and fulfil their potential.

Mitigating the effects of poor design can never be as effective at preventing crime and disorder as good design.

I would be grateful if you would contact me at the next stage of the consultation process.

If I can be of any further assistance please do not hesitate to contact me.

Yours sincerely,



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

**Enquiries to:** [REDACTED]  
**Direct line:** [REDACTED]  
**Email:** [REDACTED]  
**My reference:** EHDC Reg18 Local Plan  
**Your reference:** Reg18 Local Plan  
**Date:** 11 January 2023

Dear [REDACTED],

### **East Hampshire Local Plan 2021-2040– Regulation 18 Consultation**

I am writing in response to your Regulation 18 Consultation. In doing so, I have also taken account of your recent response to our own Regulation 18 consultation on Havant's Building a Better Future Plan. It is suggested that these two responses might form the beginning of further Duty to Cooperate discussions between our two authorities.

We have read with interest your Regulation 18 Draft Plan. Havant supports East Hampshire's proposal to meet its own housing need in full, and thanks you for acknowledging that there is a need for East Hampshire to consider meeting need from both the South Downs National Park and the PfSH area.

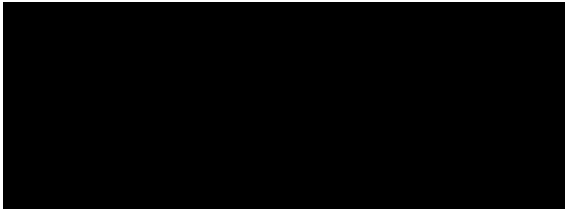
It is acknowledged that Havant's evidence base on housing supply is currently not well enough advanced to confirm supply against the Standard Method and thus categorically confirm whether or not it will be able to meet its own development needs over the plan period. Havant Borough Council will continue to build its evidence base regarding housing need and supply. This will include an updated SHLAA, and a detailed constraints and supply analysis (see below), among others. Critically, Havant Borough Council will leave no stone unturned to meet its own need, before making formal requests to other districts. However, as we have previously discussed and reflected in early work on your Local Plan Sustainability Appraisal, we consider it highly likely that Havant will be forced to make a formal request in due course; our work on the previous Local Plan and the inspector's draft findings on that plan give a reasonable indication that this may be the case.

On this basis, it is considered inevitable that this matter will need to be addressed fully within both Havant's and East Hampshire's Regulation 19 Plans, and I note your desire to continue to collaborate with Havant on cross boundary matters. For the avoidance of doubt, in response to your consultation question POP4, we would strongly encourage East Hampshire to assist with unmet need. As well as relationships with existing communities in East Hampshire there may be potential sites within East Hampshire with relationships to neighbouring districts including Havant.

As part of joint exploration of potential sites, I would like to extend an invitation for East Hampshire to work with Havant on an analysis of development constraints and supply in both districts. HBC is commissioning a piece of work for its whole area to support the Local Plan in any case, but I would suggest that joint working, perhaps focussed on the border between the two districts would be beneficial. If agreement could be reached on the parameters applied to the availability of sites and constraints to development, and questions around density, accessibility, landscape factors and the like, and joint working on these points could be demonstrated, I consider that this would be helpful to both authorities at examination.

Havant Borough Council and East Hampshire District Council have a proven track record of positive collaboration on cross-boundary matters through past joint management arrangements. Despite the loss of this formal connection, I look forward to continuing our positive collaboration and discussing our respective local plans as they progress. Might I suggest a meeting to start these talks at the earliest convenient date?

Your sincerely





Historic England

FAO:  
The planning policy team  
East Hampshire District Council

Our ref:



[localplan@easthants.gov.uk](mailto:localplan@easthants.gov.uk)  
by email only

13 January 2023

Dear planning policy team

**Re: East Hampshire Local Plan (2021-2040) consultation, Issues and Priorities, Regulation 18 – Part 1**

Thank you for consulting Historic England on the ‘Better Homes, Better Places’ document to inform East Hampshire District Council’s emerging Local Plan. As the Government’s adviser on the historic environment, Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process. In this letter I set out general comments below and append more detailed comments and suggestions.

A summary of our headline comments is as follows:

**Historic environment evidence base**

We note that this consultation does not feature heritage, as stated on page 12 of the document. Doing so is clearly the Council’s prerogative, though it is not a choice we would usually recommend for Local Plan development, as it risks compartmentalising heritage into a niche area, without recognising links with other key policy issues.

We assume that further work on heritage will become clear in the next stage of consultation, with reference to and supported by an appropriate evidence base.

We note that heritage considerations inform (to a greater or lesser extent) several of the studies already undertaken, including the Landscape Capacity Study, Green Infrastructure Study, Renewable and Low Carbon Study and Neighbourhood Character Study, underscoring the cross-cutting nature of heritage. We anticipate and look forward to seeing further work on the heritage evidence base regarding:



Historic England, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA  
Telephone 0370 333 0607 [HistoricEngland.org.uk](http://HistoricEngland.org.uk)

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.



- heritage impact assessments of proposed development sites, with the level of detail proportionate to the type and location of each allocation and the potential heritage issues arising;
- conservation area appraisals and management plans, noting that some of the published appraisals or guidance documents would benefit from review; and
- other studies as appropriate, with reference to the concerns we raised about heritage evidence in our response to the Local Plan consultation in March 2019 and to the Large Development Sites consultation in October 2019.

We emphasise that knowledge of the historic environment and the opportunities it offers evolve over time. The condition of heritage assets may change, assets may be designated for their significance on the [NHLE](#) or identified as non-designated heritage assets; new discoveries of archaeological remains may have occurred; and new proposals may be put forward which the Local Plan could help to facilitate.

### **Sustainability Appraisal (SA)**

It is regrettable that this consultation document is not informed by sustainability appraisal, especially to inform the Council's analysis of spatial development options from the outset. The options are assessed in a background paper against five topics which do not include the historic environment. As a result, they give an incomplete framework for assessment. We look forward to further detail being added via SA as the Local Plan progresses.

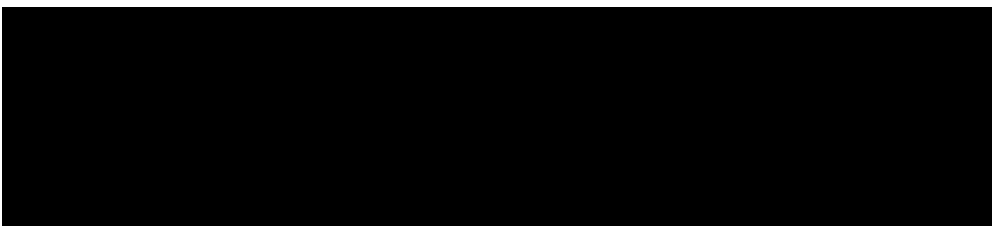
### Detailed Comments

Our detailed comments, including answers to relevant consultation questions, are set out in an Appendix to this covering letter.

To avoid any doubt, this does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed Local Plan, where we consider these would have an adverse effect on the historic environment.

I hope that these comments are helpful. If you have any queries about this matter or would like to discuss anything further, please do not hesitate to contact me.

Yours sincerely



## APPENDIX A: Detailed comments

Page	Question	Comment
5		<p>While we appreciate the rationale for re-setting the Local Plan as outlined on page 4, we are not entirely comfortable with the language on page 5. Stating that “We are seeking comments and information on the key issues and priorities that should be addressed in the new Local Plan” without including content on the historic environment in the document risks misinterpretation. We infer the Council is seeking comments and information on <u>selected</u> key issues and priorities, not on all key issues that would deliver a sound plan. This may be stating the obvious, but there is no diminution in the importance of heritage issues since the Council’s prior work on revising its Local Plan in 2019. The text on page 12 gives some reassurance in this matter.</p> <p>Also, while we realise the language in the final paragraph of this page only offers some examples, we reiterate a point made in our prior correspondence of the importance of referring to the built, <u>historic</u> and natural environment (as outlined in the NPPF; for example, in paragraph 8). The terms ‘built environment’ and ‘historic environment’ are not interchangeable.</p>
9		<p>We note that the Council’s ‘Climate and Environment Strategy 2020-2025’ defines the environment only in terms of the natural environment. Historic England strongly supports urgent climate action and, crucially, believes that heritage is part of the solution.</p> <p>We have published a range of resources that may be of interest to the Council, including our own Climate Change strategy, and we recommend further consideration of the role of heritage in this regard. Our hub page is here: <a href="https://historicengland.org.uk/whats-new/features/climate-change/">https://historicengland.org.uk/whats-new/features/climate-change/</a></p>
11	VIS1	Unhappy
11	VIS2	No
11	VIS2a	<p>Unlike the vision of the Council’s place-making strategy 2019, the draft vision of the Local Plan does not refer to the District’s heritage, which we believe is a missed opportunity. One way to tackle this would be to change ‘green’ places to ‘sustainable’ places. This would also avoid any uncertainty about the term ‘green’ e.g. does this refer to green infrastructure or is it a colloquial term, more synonymous with sustainable? Note the term ‘green’ is used later in the Plan when commenting on net zero buildings to refer to the use of renewable energy.</p> <p>Alternatively, if the Council would consider expanding the vision a little, we’d recommend the addition of a clause such as shown below (also including the change to ‘green’):</p> <p>“By 2040 our residents will live in healthy, accessible and inclusive communities, where quality homes, local facilities and employment opportunities provide our communities with <u>sustainable, green and welcoming</u> places to live, work and play, <u>making the most of the District’s natural, built and historic environment</u> and <u>responding positively to the climate emergency.</u>”</p>



Historic England, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA  
Telephone 0370 333 0607 [HistoricEngland.org.uk](http://HistoricEngland.org.uk)

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Correspondence or information which you send us may therefore become publicly available.



11	VIS3	No comment
12 / 13	OV1	No comment on ranking; however, we flag the important point that the environment is a broad term that includes both the natural environment and the historic environment. If the key issue identified relates to the <u>natural</u> environment, please make this clear.
14		Retrofitting does not automatically or universally fall outside the remit of the Local Plan. As noted in Appendix 3 of the Council's background paper on climate change, Local Plans can include planning policies to ensure that changes to existing buildings – such as extensions or redevelopments – are undertaken sustainably. While it's true that many retrofitting measures do not require consent, there remains scope for the Local Plan to support sustainable retrofitting where consent is required. We note that South Downs National Park Local Plan mentions retrofitting in Strategic Policy SD48: Climate Change and Sustainable Use of Resources. We recommend further consideration of the role of the Local Plan regarding retrofitting, helping to inform decision-making on proposed schemes for development that include retrofitting. As the Council will be aware, retrofitting of historic buildings requires special consideration. Further information is available on our website: <a href="https://historicengland.org.uk/advice/technical-advice/retrofit-and-energy-efficiency-in-historic-buildings/">https://historicengland.org.uk/advice/technical-advice/retrofit-and-energy-efficiency-in-historic-buildings/</a>
15	CLIM1	No comment
15	CLIM2	We do not wish to comment on ranking; however, we welcome the reference that any wind or solar development must be in keeping with the locality and its surroundings, which we infer includes reference to the historic environment.
16	CLIM3	No comment
16	CLIM3a	While we note the definition proposed for net zero is being applied to new buildings only, this has the potential to impact on the historic environment if it is used in any decision-making relating to extensions or conversions. In such cases, traditionally constructed buildings merit special consideration, as acknowledged in the Building Regulations (Approved Document Part L). We provide further advice on our website: <a href="https://historicengland.org.uk/advice/technical-advice/building-regulations/">https://historicengland.org.uk/advice/technical-advice/building-regulations/</a>
17	CLIM4	Yes, though this needs to be done while also considering potential impacts on the historic environment i.e. taking a holistic approach
18		We are not certain that the Figure is very helpful, as it risks over-simplifying the various ways in which resilient environments can be created e.g. through use of passive heating and cooling.
18	CLIM5	Yes, local plans, neighbourhood plans and design codes all have a role, individually and collectively in mitigating and adapting to climate change. As the Council will know, this is not delivered by single climate change policies or measures in isolation, but in a suite of relevant approaches that support climate change mitigation and adaptation. This ranges from the protection and provision of green infrastructure to support for building re-use and the suitable retrofitting of existing buildings.



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20	CLIM6	No comment
24	POP1	No comment
25	POP2	No comment
26	POP3	No comment
27	POP4	No comment
32	HOU1	No comment
32	HOU2	No comment
33	HOU3	No comment
33	HOU4	No comment
35	HOU5	No comment
35	HOU6	No comment
36	HOU7	No comment
36	HOU8	No comment
37	CFS1	No comment
38 – 46	Environment	The environment is a broad term that includes both the natural environment and the historic environment. Consequently, there is potential for confusion if the term 'environment' is considered to mean 'the natural environment'. Also, it is important to recognise the overlap between the natural environment and the historic environment. We welcome heritage significance and heritage assets being considered in the Council's work on landscape character; and we emphasise the importance of considering the heritage dimension of other work on the natural environment, ranging from the approach to the provision of green infrastructure, to considering archaeological considerations in sites better known or indeed designated for their natural beauty. When the Council reviews sites put forward as potential 'green sites' – responding to the call for green sites on page 46 – the relationship with the historic environment should be factored into the analysis.



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45	ENV1	No comment
46	CFS2	No comment
48	INF1	<p>NPPF paragraph 20 advises that: "Strategic policies should set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for: ... c) community facilities (such as health, education and cultural infrastructure); ... "</p> <p>Historic England considers cultural infrastructure to include heritage assets. While it is difficult to quantify a requirement for cultural infrastructure, given the importance of cultural infrastructure, as identified in the NPPF, Historic England asserts that it would be reasonable to expect the plan to aim to at least maintain existing levels of cultural assets that exist within the District, and to seek improvements to secure the long term future of assets classed as 'at risk'. Clearly, regimes for the protection of heritage assets are already in place. However, for heritage assets that are identified 'at risk', while a range of mechanisms may be used to save these assets, none of these are guaranteed. Therefore, Historic England is keen that any opportunity to save heritage assets is explored. For example, Walldown enclosures is on the Heritage at Risk register and I believe has been for some time. Given its public value, the Scheduled Monument could be an ideal candidate for further engagement, via a project to enhance access and interpretation through community engagement and active participation.</p>
50	INF2	No comment
50	INF3	No comment
51-61	Development strategy and spatial distribution	We agree with the Council's statement on page 61 that "it's important that the process of site-selection starts from the right point of departure." However, as explained in our cover note, we are very concerned that the spatial options are currently being considered without reference to the historic environment. We trust that this omission is addressed as a priority in future work on the Council's spatial strategy.
61	DEV1	No comment
61	DEV2	No comment
61	DEV3	No comment
62	GEN1	No comment
62	GEN2	No comment



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Sent by email to: [localplan@easthants.gov.uk](mailto:localplan@easthants.gov.uk)

16/01/2023

Dear Sir/ Madam

### **Response by the Home Builders Federation to the consultation on the Issues and Priorities for the East Hampshire Local Plan**

1. Please find below the Home Builders Federation (HBF) response to the consultation on the East Hampshire Local Plan. The HBF is the principal representative body of the housebuilding industry in England and Wales and our representations reflect the views of discussions with our membership of national and multinational corporations through to regional developers and small local housebuilders. Our members account for over 80% of all new housing built in England and Wales in any one year.

#### **Plan period**

2. The Council are proposing a plan period of 2021 to 2040. On the basis of the plan being adopted in September 2025 it is stated that the plan will look forward at least 15 years as required by paragraph 22 of the NPPF. However, given what is a tight time scale that would require the examination to be concluded in less than a year we would recommend that an extra year be added to the plan period to ensure that the plan period is consistent with national policy and avoid the need for modification post examination.

#### **Climate emergency**

##### **Net zero greenhouse gas emissions**

3. Whilst the HBF recognises the need for new development to reduce greenhouse gas emissions and work towards net zero the approach taken by the Council must be consistent with national policy. The Council must recognise that the Government has already set out a clear road map to achieving zero carbon ready homes as part of the Future Homes Standard from 2025, prior to the proposed adoption of this plan, and as such the HBF does not consider it necessary for an alternative standard and compliance framework to be included in the local plan. In considering its approach the Council will need to take into account section 5 of



Planning and Energy Act 2008 which states that energy policies in local plans “... *must not be inconsistent with relevant national policy*”. Alongside this consideration must also be given to current Government policy which was first established in the Written Ministerial Statement and then reiterated in paragraph 6-012 of PPG. These two statements set out that Council’s should not go beyond a 20% improvement on the 2013 building regulations (an improvement equivalent to the long-abolished level 4 of the Code for Sustainable Homes). Given that this has now been exceeded by Building Regulations it is evident that the Government’s intention is to use building regulations as the main focus for change on this matter and this is further reinforced by paragraph 154b of the NPPF states in relation to greenhouse gas emissions that “... *any local requirements for the sustainability of buildings should reflect the Government’s policy for national technical standards*”.

4. This would suggest that whilst the Government have accepted some uplifts to technical standard can be made through local plans, they are seeking to deliver major changes to energy efficiency standards through building regulations and not through local plans. Certainly, it cannot be argued that they are expecting Council’s to set standards in excess of the Future Homes Standard which as mentioned above, will deliver homes that are zero carbon ready from 2025. As such the Council must follow the Government’s position which is that improvements to technical standards moving forward will be addressed through building regulations and not through local planning policy.

#### *Design of new buildings and the energy hierarchy*

5. The energy hierarchy sets out good practice with regard to the delivery of net zero development. However, its application needs to be consistent with the approach to energy efficiency that is expected to be established through the Future Homes Standard and with national planning policy which, for example, makes no mention at present of development being required to offset any residual emissions following the application of technical building standards and any renewable energy requirements set in the local plan.

#### *Criteria for tackling climate change*

6. Any detailed criteria should be provided for within the local plan as this will ensure a consistent approach to these across the Borough. Any criteria should also ensure that there is sufficient flexibility to take into account site specific circumstances and viability.

#### *Living locally and the location of new homes*

7. The principle behind the 20-minute neighbourhood is one that is a reasonable aspiration to take forward within the local plan, but the Council must remember that this should be seen as an aspiration within appropriate locations rather than a blunt tool for development management or site allocations across the Borough.

For example, the application of this principal in more rural areas, as the Council note, is inevitably more difficult as populations are generally too low to meet all the features of a 20-minute neighbourhood. However, this should not prevent development from happening in such locations where appropriate.

8. Firstly, there may be clusters of villages that provide a range of services for that area within reasonable travelling of each other. These areas might be able to sustainably support a substantial level of development but may not meet the principles of the 20-minute neighbourhood and as such development in such areas is not supported in the local plan. Secondly, the Council will need to recognise that settlements that currently do not have the services that are consistent with the 20-minute neighbourhood could expand to include those services if new development is allocated in those areas. The 20-minute neighbourhood should not be used as a basis for only locating development close to existing services rather identifying where services could be improved through new development. There is a real danger that the principle could be used negatively and become a way of preventing development in certain communities rather than promoting improved neighbourhoods.
9. Finally, the Council must also recognise that if it seeks to apply this principle there is a need for the Council to provide a strong leadership function for local public services to ensure that these are in place and are retained. The Council must ensure that they and their partners are able and willing to support this concept at larger strategic developments or where the Council is seeking to deliver higher density development. Without this strong co-ordinating role, the Council are unlikely to achieve their aspirations in relation to the 20-minute neighbourhood.

## **Housing**

### *Approach to assessing housing needs*

10. The Council should use the standard method to establish the minimum number of homes that the Council need to deliver. The HBF agrees with the Council's evidence and does not consider there to be any exceptional circumstances in East Hampshire to warrant the use of an alternative methodology.

### *Meeting unmet needs in neighbouring areas.*

11. In the consultation the Council ask how many homes the Council should deliver in response to the housing needs in the area covered by the South Down National Park Authority (SDNPA). The Council identify that there is an annual need for 517 homes within those areas of East Hampshire outside the national park and 115 homes each year for those areas in the national park. The statement of common ground between the two authorities state that the SDNPA will be able to meet its commitment to delivering 100 dwellings per annum in those areas of East Hampshire for which it is the local planning authority up to 2028. As such there will be a shortfall in meeting needs up to 2028 and it is reasonable to assume that

these shortfalls will continue across the period of the new local plan. In fact, there is a significant likelihood that the amount of unmet needs in the area covered by the SDNPA will grow given the constraints on growth within that area.

12. The Council will therefore need to work closely with the National Park as part of the review of SDNPA Local Plan to determine the capacity of that area to deliver more housing to 2040. Once this has been established then the Council will have a clearer position as to the number of additional homes it will need to deliver in order to ensure needs across the whole of East Hampshire are met.
13. The Council should be looking to support neighbouring authorities wherever possible to meet their needs. We note that the recent consultation by Havant stated that there would likely be shortfalls in meeting housing needs due to constraints and the Council should be considering whether those area adjoining Havant could deliver more housing to address some of Havant's unmet needs.
14. However, the shortfalls in south Hampshire go beyond Havant. What is evident from plan preparation across south Hampshire is that there are unmet needs also arising in a number of other areas including Portsmouth, Southampton, and Gosport. Indeed, the latest evidence considered by the Partnership for South Hampshire as part of the updated Statement of Common Ground indicated that the shortfall across the area was some 20,000 homes. This is a significant shortfall and whilst clearly East Hampshire cannot be expected to meet all of these needs it should be looking at developing a spatial strategy that would meet some these needs.
15. It is important to recognise that the impact of neighbouring LPAs failing to meet needs has wider impacts. For East Hampshire it will mean that the housing growth it proposes will have less impact on the rising cost of housing seen within the area. The area already suffers from poor affordability with median house prices being over 14 times median salaries. Whilst some of this will be due to the cost of housing in the national park the situation will not improve if insufficient housing is not provided outside of the national park.
16. Other benefits of meeting these needs will be the increased delivery of affordable homes to better meet local need for such homes, increase Council Tax returns for the Council, and the collection of the Community Infrastructure Levy to improve local infrastructure. With regard to affordable homes the Council have identified that they need to deliver 613 affordable homes each year to meet needs. This is significant and reflects the worsening affordability of housing in East Hampshire. Whilst the Council will not be able to meet these needs in full it can do more by delivering more homes than the minimum required by national policy. Such an approach is supported by paragraph 2a-024 of PPG and must be a key consideration in determining the number of homes to be planned for.
17. In relation to other benefits the Council note in their latest AMR that the Council sent out demand notices in 2020-21 for CIL totalling over £4m and has a

provisional allocation for New Homes Bonus in 2023/24 of nearly £700,000. These are substantial financial benefits to the Council and given the constraints on Council revenues must be recognised as key benefits when considering the number of homes, it can build and the degree to which it can meet some of the unmet needs in neighbouring areas.

#### *Conclusions on housing needs*

18. Given that there are identified unmet needs for housing in neighbouring areas the Council will need to consider strategies for delivering more than the minimum level of housing need calculated using the standard method. These strategies should be assessed as reasonable alternatives in the Sustainability Appraisal and give an accurate assessment of the benefits accruing from house building within East Hampshire.

#### **Type of housing needed.**

##### *Older people's housing*

19. The HBF would recommend that the Council include a specific policy to support the delivery of older people's housing. This policy should include a specific target for these needs and, if possible, allocations in the local plan to show how these needs will be met. Whilst the NPPF does not require the housing needs of older to be included in such policies the HBF considers the absence of a stated requirement means that such policies are ineffective. In order to be effective decision makers must be clear as to the level need for this type of accommodation and whether there is a shortfall in meeting these needs. If there is a shortfall decision makers can then act appropriately giving significant weight to the delivery of such homes to meet any shortfalls.

##### *Accessible housing*

20. The Government consulted on making part M4(2) the mandatory standard for all housing and confirmed its intention to do so in its consultation response published in July 2022<sup>1</sup>. However, the optional standard with regard to M4(3) remains and if the Council wishes to set a specific requirement with regard to this standard it will need to provide evidence, as required by national policy, as to the needs for such homes in East Hampshire and consider the impact of any requirements on viability.

##### *Housing mix*

21. Firstly, the most effective way of ensuring a mix of housing sizes, types and styles is through the allocation of a wide variety of sites in terms of size, type and location.

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<sup>1</sup> <https://www.gov.uk/government/consultations/raising-accessibility-standards-for-new-homes/outcome/raising-accessibility-standards-for-new-homes-summary-of-consultation-responses-and-government-response>

This will support a greater variety of house builder to deliver homes in the area who will inevitably provide different types and sizes of homes that will meet the needs of different markets in East Hampshire.

22. Secondly, any policy on housing mix must also take into account that housing needs assessments are a snap shot in time and that the type of home needed across the Borough. The type of home needed in different areas can vary significantly from the brough wide needs and also with regard to what has been delivered in the past. Some more built up areas may have had more flatted development delivered and as such there is more need for family homes. Therefore, rather than set fixed percentage we would recommend that the policy establishes that development must have regard to the most recent evidence on housing needs which will include the Borough's housing needs assessments but also any local studies and monitoring evidence that has been published. This will ensure that most up to date evidence is used and the Council can apply its policy on mix to reflect what is needed in relation to the area in which the site is located.
23. With regard to the size of development that should be required to deliver any mix stated in policy we would suggest that this only be applied to major development. Sites of fewer than 10 units are less likely to be suitable to deliver a mix of homes on site.

#### Affordable housing

24. The Council have yet to produce a viability study to support the development of this local plan. Without this evidence it is not possible to say whether the current 40% affordable housing threshold remains appropriate given that there will be significant additional costs placed on development, such as the mandatory delivery of 10% net gains in biodiversity and higher energy efficiency standards on all new homes, that were not present when the previous local plan was prepared. In addition, the Council must take account of paragraph 58 of the NPPF and paragraph 10-002 of PPG which both outline the need for decision makers to be able to assume that development meeting all policies in a local plan are viable and that negotiations on viability will be limited. This will require the Council to consider, for example, variable affordable housing requirements based on site type and location as well as ensuring that there is sufficient headroom to take account of abnormal and uncertain costs, such as those relating to Biodiversity Net Gains (BNG).
25. It will be important for the Council to work with the development industry to ensure that policies are realistic and will not compromise the deliverability of the local plan. To support local planning authorities in preparing their viability evidence the HBF has prepared a briefing note, attached to this response, which sets out some common concerns with viability testing of local plans under the latest guidance and how these should be addressed. Whilst this note focuses on all aspects of the viability testing of the residential development and should be taken into account,

we would like to highlight four particular issues with whole plan viability assessments.

26. The first issue is with regard to the approach taken to abnormal infrastructure costs. These are the costs above base construction and external costs that are required to ensure the site is deliverable. Prior to the 2019 iteration of the NPPF viability assessments have taken the approach that these cannot be quantified and were addressed through the site-by-site negotiation. However, as outlined above, this option is now significantly restricted by paragraph 58 of the NPPF. As such these abnormal costs must be factored into whole plan viability assessments. We recognise that the very nature of an abnormal costs means that it is impossible to quantify them accurately, but it is a fact that they are often substantial and can have a significant impact on viability. Where and how these costs arise is also variable. They can occur in site preparation but can also arise with regard to the increasing costs of delivering infrastructure, such as upgrades to increase the capacity of utilities. It is also the case that abnormal costs are higher on brownfield sites where there can be a higher degree of uncertainty as to the nature of the site and the work required to make it developable.
27. Whilst we recognise that national policy expects abnormal costs to come off the land value, we are concerned that if abnormal costs are high then it can result in sites not being developed as the land value will be insufficient to incentivise the landowner to sell. It is therefore important that a significant buffer is included within the viability assessment to take account of these costs if the Council are to state with certainty that those sites allocated in the plan will come forward without negotiation.
28. Secondly, we would encourage the Council to use the upper end of any of the ranges suggested with regards to fees and profit margins. Again, these will vary from developer to developer but given that the Government want to minimise negotiation on planning obligations it would make sense to use the highest point of any range.
29. Thirdly, build costs and fees will need to take account of the inflationary pressures seen recently. Increasing prices and labour costs will have a significant impact on house prices and it cannot be relied on that house price inflation will be sufficient to offset the increased costs of bring froward and building development in Havant.
30. Fourthly, the councils must ensure that all the policy costs associated arising from the local plan are considered alongside the likely costs that will be imposed on development through local plans and other national policies and standards. In terms of new national building standards and levies imposed on house builders the HBF have estimated in a new report that these cost on average about £20,000 per new home built. This is in addition to the costs imposed through local plans. It will be essential that the strategic policies and aspirations of the local plans do not take account of these costs. However, it will also be necessary to leave sufficient headroom as the cost of delivering some national policies are still uncertain. For



example, the Impact Assessment on BNG undertaken by Government makes the assumption that a 10% net gain will cost on average £20,000 per hectare. However, in some cases our members have seen the costs of delivering this at more than £20,000 per unit. Whilst we recognise this will depend very much on the site the Council will need to ensure that there is sufficient headroom in viability to take account of costs such as BNG which are so uncertain.

31. Finally, the approach to land values needs to be a balanced and one that recognises that there will be a point at which land will just not come forward if values are too low to take account of policy and infrastructure costs. There are a variety of reasons why a landowner is looking to sell their land and it cannot be assumed that they will absorb significant reductions in land values to meet policy costs.

#### *Self-build housing*

32. It will be important that any policy is proportionate to the evidence of demand for self-building within East Hampshire. Since the introduction of the requirement to maintain a self-build register in 2016 the Council's latest AMR indicates that there are 102 individuals on the list. This does not suggest that there is significant demand for plots in East Hampshire. and should work with land owners seek to identify specific sites that will meet the needs of those looking to self-build. The Council will need to review the list periodically to ensure it is robust and that those on the list are still interested in building their own home.
33. The level of demand for plots would suggest that the Council should include a policy that is supportive of self-build development whilst working with land owners to identify suitable sites that could deliver self-build plots. In particular the Council should look to its own land. In outlining how Councils can fulfil their duties with regards to self-build<sup>2</sup> the government have set out that they should consider the demand for self-build when disposing of land within their ownership. Therefore, should the Council be seeking to allocate any site within their ownership in this local plan it will need consider whether these would be suitable to support those looking to build their own homes.

#### **Development Options**

34. To a large extent the development strategy will be defined by the location of the sites being promoted for development. As the Council notes there are pros and cons with regard to each of the proposed development strategies and in the long run elements from each may need to be adopted. Therefore, rather than give a preference as to a specific strategy we consider it more important that that the eventual strategy chosen by the council allocates a wide variety of sites in terms of size and type and that the strategy ensures a consistent supply of homes across the plan period.

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<sup>2</sup> Paragraph 57-025 of Planning Practice Guidance

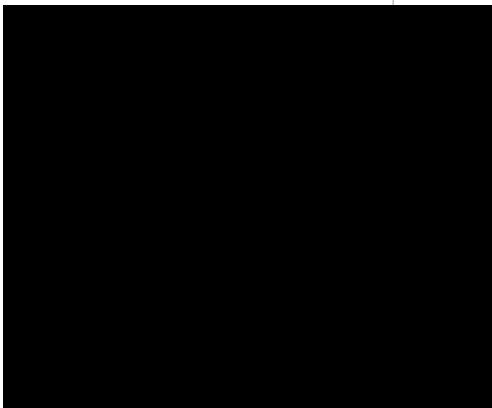
35. The Council must not unnecessarily push back the delivery of new development. Whilst PPG recognises that plans might need to include a stepped trajectory the aim in the first instance should be a plan that seeks to meet needs consistently across the plan period. This will require the plan to allocate a range of sites with smaller sites coming forward in earlier in the plan period and strategic sites delivering homes in the middle and end of the plan period. Local Planning Authorities can focus on strategies that rely heavily on large strategic sites at the expense of more balanced strategies that deliver more smaller sites. The consequence is that housing needs are met later resulting in increasing housing costs and longer waiting lists for affordable housing.

### **Conclusion**

36. The Council are in the early stages of preparing the plan and there are still a number of important pieces of evidence to be produced. In moving forward, the HBF recommend that the Council examines spatial strategies alongside the SDNPA that would in the first instance ensure needs across the whole borough are met regardless of where those needs arise. In addition, the Council should also consider whether further allocations are possible in the South of the Borough to meet unmet needs in South Hampshire. As we have highlighted in our comments above there are already unmet needs within the most urban areas of South Hampshire and if these are to be met it will require Councils such as East Hampshire to identify more land for development. Strategies that deliver more housing than the minimum required will need to be tested as reasonable alternatives in the SA and should provide a balanced assessment that recognises the benefits of such delivery with regard to affordable housing delivery, the cost of housing, infrastructure improvements and local services.

37. We hope these representations are of assistance in taking the plan forward. Should you require any further clarification on the issues raised in our comments please contact me.

Yours faithfully



## PART 1: WHAT IS VIABILITY APPRAISAL?

### INTRODUCTION

Housing land supply is critical to the Government's housing delivery objectives. A vital part of deliverability is that the development of land must be viable. The Government's approach to viability is clearly set out in the National Planning Policy Guidance (NPPG). It states how viability is critical to the soundness of local plans, the setting of CIL and the delivery of sites for housing. It is important that emerging practice is transparent and simple and that as much as possible of the new methodology can be agreed between all parties involved in housing delivery.

All stakeholders in the planning process are at the start of the journey of understanding and implementing the new approach. The aim of this guidance is a contribution to the emerging practice – putting forward the industry issues that must be addressed in order to ensure that local plans are deliverable and sites come forward for development. Without a robust approach to viability assessment land will be withheld from the market and housing delivery will be threatened, leading to unsound plans and delivery targets not being met.

Throughout this report references are made to "Viability Testing in Local Plans - Advice for planning practitioners". (LGA/HBF - Sir John Harman) June 2012 as "The Harman Report" and the RICS report "Financial Viability in Planning", 2012 as "The RICS Guidance".

### WHAT ARE IMPLICATIONS OF THE NEW VIABILITY GUIDANCE?

Viability is now a key issue for local plans and their test for soundness. It is acknowledged that land value must reflect policy requirements, but such requirements must be able to demonstrate that proposed sites in the plan are viable and that policy requirements will not prevent land from being brought to the market by landowners.

With simplification and standardisation at the heart of the new process it is accepted that a typology approach is necessary for plan-wide assessment. However, for specific sites on which the local plan relies to ensure delivery targets are met a more detailed, site specific assessment will usually be required.

Under the new guidance it is necessary to assess at what level of land value landowners will continue to be willing to sell land in the market. This benchmark land value (BLV) must be realistic in terms of existing use value of the land and a reasonable landowner's premium. This is known as EUV+ (existing use value plus a landowner's premium).

All policy requirements (including all development management policy requirements) must be included in the viability assessment. It is also vital that, as recommended in the Harman Report, a reasonable buffer is included within the assessment. Calculations cannot be at the margins of viability, without any buffer, as to do so will threaten the delivery of sites where assumptions change over the life of the plan.

In order to best reflect the policy requirements of local authorities, the risk profile of developers and the land value requirements of landowners, partnership working is essential in order to maximise the chance of delivery matching requirements of the local plan.



## WHAT IS THE LOCAL CONTEXT?

Local context is an assessment of:

- Current and emerging local needs and demands
- Local plan strategy and delivery priorities and intentions
- Spatial characteristics of the local area
- Market and affordability characteristics of the local area
- Current and historic delivery rates
- The policy circumstances under which previous consents that led to delivery were granted.

## WHAT ARE THE KEY STAGES OF A LOCAL PLAN VIABILITY ASSESSMENT?

Local plan viability assessment should:

- Follow the guidance in the NPPG
- Facilitate early engagement between all stakeholders, including developers
- Seek to assist understanding by simplifying and standardising inputs
- Address each stage of NPPG's residual appraisal approach in sequence
- Identify reoccurring issues experienced across the country and formulate these into simple questions to be addressed if the process is to be robust
- Finally assess resultant BLV and the issues that must be balanced to ensure the Plan can be found sound, the necessary land supply identified and delivery of dwellings secured

## HOW WILL ADDRESSING THESE ISSUES EARLY AND IN PARTNERSHIP LEAD TO BETTER PLANNING?

If the Plan lead system with viability and deliverability at its heart is to work, we need all interested parties to work together, in partnership. The NPPG strongly encourages such an approach in order to strike the right balance between the aspirations of developers / landowners and the aims of the planning system. Failure to work collaboratively risks failing to delivery housing needs and aspirations and failing to significantly boost housing supply.

Advantages of partnership working are to increase understanding, reduce plan making time, improve transparency, provide communities with certainty and, ultimately, deliver better local plans of which we can all be confident that allocated sites will be delivered where, when and how they are expected to be delivered.

Joint working will provide a clear benchmark for development management decision making and will ensure that any consideration of post plan adoption policy formulation (SPD's etc) are unlikely to give rise to further burden that makes development unviable.



## **PART 2: A STEP BY STEP APPROACH TO VIABILITY APPRAISAL**

### **a) Sales / Revenue**

Viability appraisal should be specific to the local planning authority area and fully evidenced from local examples. Evidence should be drawn from actual prices achieved in sales, derived from the best possible comparable sources. Such comparables must be fully critiqued (new build and second-hand market) / adjusted as necessary so that they can be relied upon to provide a robust position for future sales. Care must be taken to reflect the strong likelihood that within each LPA area there may be geographic variations in value which must be fully understood and applied to both site specific and typology viability work.

Market strength and anticipated sales rate are fundamental components dictating cash flow. Care should also be taken in determining the correct market mix for an area / based on SHMA / local market evidence / settlement & site characteristics.

Affordable housing revenue must also be fully justified against comparable transactions with registered providers and the correct % reductions from OMV must be applied for all types of subsidised/affordable housing (including private sector solutions such as shared ownership and discounted market sale).

#### **Common concerns:**

- Sales evidence used is based upon Net Sales Area instead of Gross Internal Area which significantly inflates the price per square foot thus distorting viability work
- The use of headline advertised “For Sale” prices. These prices are usually the aspirational prices for a homebuilder and do not reflect the final price achieved in negotiation with the purchaser which ordinarily involve discounts to secure the purchase.
- Actual sold prices from Land Registry/Hometrack – These prices omit incentives such as extra internal features / carpets / part exchange costs / developer deposits etc.
- Internal areas obtained from Energy Performance Certificates are used in revenue / coverage calculations. However, these generally do not represent actual Gross Internal Area as the calculation methodology is different.

### **b) Coverage**

Coverage assumptions (the quantum of sales coverage per net developable acre (NDA) must be contextual and reflective of the type and form of development envisaged and the context within which it is to be placed. It should be calculated on the basis of coverage per NDA and all parties should agree over what type of floorspace is included or excluded.

It needs to be reflective of all development management policies that will be in play which will affect the eventual scheme coverage (eg: scale, massing, amenity distances, space standards, accessibility standards, site topography, car parking levels, drainage, landscaping, biodiversity net gain etc.)



### Common concerns

- Each site is different and may have major constraints to site coverage within its boundaries, dependent upon its size and scale
- A failure to understand mix and type of homes that achieve very different quantum of coverage per NDA.
- For plan making, reasonable assumptions should be based on the expected nature of the scheme, the local housing need / demand objectives, site context and how the application of development management policies has previously affected coverage.

## c) Net Developable Area (NDA)

It is inappropriate to apply generic gross to net rates across entire regions. Discussion should be had in typology work based upon the nature and characteristics of the sites proposed to be allocated in a plan with comparable schemes examined to ensure % gross to net rates are robust. NDA should always be contextual and informed by policy requirements – including open space / sustainable drainage requirements / environmental requirements such as biodiversity net gain and suitable alternative natural green space (SANGS), etc.

### Common concerns

- That the approach taken is over simplistic and leads to inaccurate assumptions that are then multiplied across a plan area
- All stakeholders promoting sites should be able to fully engage with the process to ensure that assumptions are realistic and achievable.

## d) Costs

Assessment of costs should be based on evidence which is reflective of local market conditions. Costs should seek to be drawn from appropriate published and recognised data sources. All parties involved in site promotion should assist in ensuring all matters are taken into account. A partnership approach must ensure that all costs are accounted for and can be explained transparently and inputted into the viability assessment in a manner that all stakeholders can readily understand.

### Unit Build Cost (UBC)

The appropriate data should come from the Building Cost Information Service (BCIS). However, it is important to understand what these published costs actually include and exclude. Careful consideration must be given to the type



and scale of sites, type of developers, contextual matters that impact upon design and all DM applicable policies. Recognition should be given to regional variation and that build cost inflation will be a key factor in forward planning such that median figures should be only the starting point from which site-specific assessment can be applied.

New build housing is, by its nature, high specification (internal fit out / kitchens / bathrooms / heating) and this is reflected in BCIS which reflects Building Regulations at a particular point in time. Design or specification enhancements above this level fall within abnormal costs (see below). Care should be taken to use the most up to date and correct BCIS categories.

### Common concerns

- There is often a lack of understanding about what is included in standard measures of costs. The BCIS cost is only the cost of the house itself and is based upon a flat site with standard foundations.
- BCIS does not account for plot works (drives / paths / fencing / walls / gardens & plot landscaping / connections / detached garages) nor any costs associated with more complex ground / gradient conditions
- Although BCIS does include standard site management / overhead costs this is only to the extent of the items it measures, not full costs.
- BCIS does not account for any site externals or their overhead sums which are explained below.

### External costs

These are the base costs usually experienced on a simple, flat, unconstrained, clean site ready for building. It includes standard plot works (again based upon a standard site) covering estate roads and footpaths, sewers, drainage connections, utility provisions and connections, mains connections, street lighting, signage to adoptable standards – all based upon simple connections to existing systems / shallow excavations etc.

### Common concerns

- The costs associated with plot and site construction are commonly missed altogether or incorrectly included as part of the unit cost
- The general overheads of a development company are often completely ignored
- There is a difference between a standard cost and an extra over cost as a result of site-specific conditions – both must be accounted for but usually in different places (see abnormalities below)
- Any % of unit cost calculation to allow for externals must be very carefully considered in the context of all of the above with comparables used as evidence – if a % range is to be used it must be agreed with local developers and based upon real examples



## Abnormal Infrastructure costs

All of the above costs effectively deal with the costs associated with the base construction costs of the houses themselves (Unit build cost) alongside the standard external costs (External costs). Abnormal infrastructure costs are all those costs over and above the standard costs outlined above that are required in order to deal with site specific conditions and meeting all planning and technical requirements.

For example, in relation to external costs detailed above, in addition to the standard cost will be all costs specific to the scheme such as ground conditions / levels and topography / upgrading of utilities if insufficient capacity / drainage / contamination / additional specification required by design or development management policy requirements etc.

There are a huge range of abnormal infrastructure costs that need to be accounted for over and above standard external costs which need to be taken fully into account on a site-specific basis. Any attempt to apply standard rates whilst undertaking plan wide typology viability work should be treated with caution.

The following bullet points give some examples to assist understanding and are not to be treated as exhaustive:

- For larger development sites due recognition needs to be made of the additional cost of, for example, spine roads etc. required to service individual development parcels in addition to the estate roads which will form part of the standard costs
- Ground and enabling works – cut and fill costs associated with topographically challenging sites to allow building plateaus / effective road gradients / capping layers associated with gas / grouting / mine shafts / ground stabilisation / demolition and clearance works / remediation of contamination / subsoil conditions / dealing with groundwater / archaeological investigations / temporary haul routes etc
- On and off-site highway works – extra over road widths for bus routes / cycle route provision / single sided roads / improvements to offsite roundabouts / junctions necessary to mitigate impact / enhanced public realm works / large areas of garage courts etc
- Surface and foul water drainage – attenuation on site via SUDS / tanking / oversized pipes / permeable paving / off site sewage work upgrading / diversions etc
- Utilities – off-site upgrading / need for sub stations / primary sub-station / diversions etc
- Foundations and underbuild – costs associated with pile / raft / extra deep foundations / extra build costs dealing with levels / land retention to unit and plot build
- Ecology and landscape – laying out and maintaining new open space, habitat, screening & bunding associated with the development
- Elevational and sustainability enhancements – in order to address local design requirements / contextual features / local materials / sustainability requirements over and above Building regulations / noise attenuation with increased insulation and window specification etc.





## Common concerns

- Issues associated with effective site development are often hidden within the need to comply with other planning and/or technical requirements and are, therefore, missed or not fully understood. Commonly, only the most visible ones such as sustainable drainage or a need for a link road are picked up regularly.
- Provision needs to be made to deal with situations that may be unclear at the early stages of planning but become hugely important as sites progress
- Understanding as many of these issues early is key but to ignore them is folly – this is a key area for plan makers and developers working in partnership
- Caution is needed and plan assumptions must not be on the margins of viability. A clear buffer must be included within all viability assessments.

## Policy Requirements

Policy Requirements in their widest sense also cover a number of the issues identified in the abnormalities section above. However, to keep matters simple we have sought to split out the physical / technical matters (in abnormalities above which normally come from condition discharge / meeting technical standards) from the monetary / land use items which we aim to pick up here.

- S106 contributions – all costs associated with mitigation payments needed in order to make the development acceptable in planning terms – education / health / sports / art / public transport / police / SANGS / training / ongoing management etc + any associated indexation / fees
- S106 works – all costs associated with works / items required – play areas / allotments / community building / sports pitch / school or school expansion / landscape improvement / local tariffs for net biodiversity gain / SANGS etc
- CIL – all payments required as a result of existing or proposed CIL whilst ensuring that no double counting occurs with S106 items + any associated indexation / fees
- Mix Policy – the effect that specialist housing provision may have on land value that is not covered by affordable costs allowed for in revenue or coverage – requirements for private rented, self-build, extra care, sheltered housing
- Non-residential uses – costs associated with servicing / marketing / construction of local centres etc
- Land / Third Party costs – these are interlinked with contractual matters yet they are regularly occurring issues - eg ensuring clean title / JR & covenant insurance / vacant possession from tenant farmers / mines and minerals payments / ransoms such as Railtrack Shared Value Policy



## Common concerns

- Obvious S106 contributions are very visible. However it is important to also include those matters where it is harder to quantify the cost.
- CIL is particularly difficult to deal with if it is considered after the local plan viability stage. New guidance suggests that CIL should be considered as an integral part of local plan viability assessment. If this is not done it will reopen the widespread use of application level viability assessment (contrary to NPPF ) as schemes considered viable at a policy compliant level will no longer be so.

## Contingency

All development schemes require a degree of contingency planning built into the viability to cover a wide range of matters. Issues as mundane as bad weather to more complex political policy issues such as quality control/snagging and government proposals for improved customer satisfaction. Due to their uncertainty, these costs are best dealt with as a % of total build costs including fees (Unit, External and Abnormals) with the % being dependent upon the complexity of the scheme and scale of site abnormals to contend with. The actual % should reflect the opinion of independent QS companies and be backed by clear evidence.

## Agent Fee costs

All development transactions usually require agents acting on behalf of the parties and an allowance needs to be made for this in overall viability work. Usually this cost is around 1-2% of land value (Harman Review) but local evidence should be obtained including from the Public Sector Estate Departments.

## Legal Fees costs

All development transactions require legal representation in order to ensure each party is protected and understands their respective contractual commitments. Again, a standard assumption of 0.75-1.5% of land value (Harman Review) is generally sufficient unless there is robust local evidence to the contrary (although this can be much higher should the land purchase involve multiple landowners).

## Marketing Costs (sales)

Housing development is sales driven without which a house builder will not receive the revenue essential for continued investment and build. Advertising and marketing is crucial to this process and allowances must be made for this in viability. This is generally assumed to be 3-5% of the value of the development depending on strength / quality of the market (Harman Review) unless there is robust local evidence to the contrary.

## Professional Fees

The development process requires huge input from a wide variety of disciplines from design and engineering to ecologists and archaeologists. The process is complex and requires expert opinion and guidance throughout. This must



be accounted for in viability work with the level dependent upon the complexity of the site, in particular, the extent of abnormal costs.

An allowance of 8% to 10% of all costs and up to 20% for complex sites (Harman Review) should be made unless there is robust local evidence to the contrary.

For larger development sites a range of professional fees associated with the servicing of the land need to be specifically considered – these will be in addition to the fee allowance based off Build Costs.

Discounting should not be applied for larger development companies simply because they have internal resources as this is still an identifiable cost that is not included within the general company overhead. It therefore needs to be accounted for within the viability assessment.

## General Finance Costs

The development of land requires significant financial investment on behalf of the developer. This requires finance to be raised at the prevailing market rate, reflective of the risk profile considered appropriate by the particular lending institution. This needs to be allowed for in all viability assessment.

The HCA currently uses a range of 5-7%. The HBF recommends 6.5% to 7% across the whole housebuilding sector. However, this is an annual finance rate and a cashflow will need to be produced. Quantity surveyors vary in their preference for applying this to a 'funds' or a 'cash' position. Industry preference is to use 'funds'. However, should 'cash' be used a 'credit rate' should not be used once the scheme goes 'cash positive'.

### e) Profit

A fair and reasonable profit for developers reflective of the particular risk profile of the specific scheme must be secured if viability is to be established. As part of this, an acceptable cash flow (return on capital employed – ROCE) must also be secured which is key to scheme delivery. The Harman review suggested a minimum ROCE of 25% but made it clear that this would depend on site specific risk.

Developers should be incentivised to build and the degree of risk they must take to facilitate this should be reflected in the margin received / planned for as well as ROCE. The NPPG clearly outlines what it considers a reasonable assumption for plan making as 15 – 20% of GDV but stresses that alternative figures can be used dependent upon risk profile.

The RICS Guidance states that not only should the direct risks within the scheme be considered but also the broader market risks such as the strength of the local market. The risk profile of a scheme will be affected by the timing of the delivery, the complexity of the scheme and the cashflow for specific projects, particularly where significant upfront investment is necessary to facilitate development.

Thus, it is unlikely that adoption of a single standard plan wide benchmark would be appropriate as it is unlikely to reflect an appropriate risk profile for specific projects. The NPPG also indicates that where affordable housing guarantees an end sale a reduced level of profile may be justified as risk is significantly reduced.

Achieving an acceptable profit is an essential part of effective scheme delivery – if it is eroded too far this will act as a deterrent to investment or result in no investment at all.



## f) Benchmark Land Value (BLV)

Fundamentally, the application of the step by step approach above arrives at a residual value which is the amount of money left over to purchase the site at a level that ensures policy compliance – this is a key objective of the new NPPG approach.

That value is to be based upon EUV+ whereby the combination of EUV and premium provide a reasonable incentive for a reasonable landowner to bring forward land for development. NPPG states that this will be arrived at via an iterative process informed by professional judgement and must be based upon the best available evidence informed by cross sector collaboration. This should assess market evidence, reflect the cost of policy compliance, take account of all site / market specifics and importantly reflect the reasonable expectations of landowners. Alternative use value may also be informative in establishing BLV.

As recognised in the RICS Guidance, achieving a suitable BLV requires a balanced judgement to be made. If that balance is not correct it could lead to a disincentive for owners to bring land to the market. This would seriously undermine the delivery agenda with the aim of significantly boosting supply which requires the widest range and choice of sites possible to maximise market absorption. It is illogical and counterproductive to effective plan making / boosting housing supply to seek to plan at the margins of viability and thus jeopardise site delivery and plan soundness.

Achieving an acceptable land value cannot, therefore, be a one-sided debate and is the key area that all must come together on as early in the process as possible utilising an effective format with senior representation on all sides with the necessary expertise and evidence to back up key viability judgements / assumptions.

### Common concerns

- The circumstances of each and every owner is different – some need to sell, some don't / some have a requirement to reinvest, some don't / some can act independently, some cannot. These are all important matters that help to establish reasonable incentive to sell.
- Land is a hugely important / unique commodity and as such it cannot be treated in the same way as most other commodities. It involves legacy issues / personal attachment issues / local community issues / inheritance issues / lifespan issues in an ever changing world. All of these matters are also important in establishing what is a reasonable incentive to sell.
- Taxation must also be factored in – inheritance tax planning / corporation tax / Capital Gains Tax must be taken into account when determining reasonable incentive. There is a probable 20% impact from CGT on all land transactions.
- Fundamentally, there is little understanding of landowner considerations within the planning process yet without it the plan led system and housing delivery will be undermined.



## **PART 3: CONCLUSION AND USE OF THIS GUIDANCE**

### **CONCLUSION**

The aim of this guidance is to set out a clear interpretation of the NPPG. It encourages early collaboration between all interested parties in order to understand the components of Plan viability. Consistency is the key, as is the need to ensure legitimate costs are fully accounted for in a transparent manner that all stakeholders can understand. It provides a platform for establishing a Plan led evidence base and where there is disagreement, a format that an EIP can use to focus debate and discussion having agreed as much as possible via Statements of Common Ground.

Dealing with this vital issue via an industry wide, HBF methodology, allows for this consistency and continuity with all stakeholders. We hope that it will assist in reducing delays to the plan making process and make the best use of resources in both plan making and again at EIP.

The principles adopted herein are equally applicable to plan-wide or site-specific viability assessment. With more strategic sites this work should also be accompanied by cashflow information to ensure all key projects are deliverable.

### **RECOMMENDED USE OF THIS GUIDANCE**

- To act as a starting point for Plan led viability and stakeholder involvement.
- To help ensure that the methodological approach of all parties is consistent and straightforward.
- To ensure that LPA expert appointments are instructed to work on this consistent basis
- To provide a basis of narrowing differences down early in the process to assist more informed decision making and more robust plan formulation.
- To act as a checklist / platform for Plan examination at EIP that is transparent / understandable to all, thus allowing focused debate and speedier / better decision making.



Suggested response to Local Plan Consultation: Issues and Priorities Reg 18- Part 1.

VISIÓN:-

VIS1- Happy.

VIS2 - Yes. it sets the parameters for how the District should be developed over the Plan Period.

VIS3 - No. the document would become too cumbersome and could result in challenges based on interpretation by parties with differing agendas.

OVERVIEW:-

OV1 - Climate Emergency.

Environment.

Population and Housing.

Infrastructure.

Types of Housing Needs.

There is very little to choose between these categories but it makes sense that planning authorities take on board the emerging problems with climate change and plan accordingly. There is little point in having a population housed in properties built in the wrong place. Without a sound environment, we do not have a viable place to live. Infrastructure is intrinsically caught up in the decision making process.

CLIMATE EMERGENCY:-

CLIM1 - Yes.

CLIM2 - That trees and other green infrastructure could play an important part in reducing flood risks.

That climate change policy should clearly identify the impacts on water availability with water consumption being reduced in new developments including by reusing it on site.

That all new buildings should be carbon zero.

That every new development should have renewable energy provision etc

That the construction of new buildings should use less fossil fuels etc.

CLIM3 - Yes.

CLIM4 - Yes.

CLIM5 - Yes, all three factors should be considered.

CLIM5a - The emerging East Hampshire Local Plan should be the overarching document setting out the policy. Future Neighbourhood Plans and Local Design codes should focus on aspects specific to an area and proposed development.

CLIM6 - Happy.

CLIM6a - The principle of living locally is an attractive one but is totally impractical and unachievable for most residents of Horndean. Poor planning in the past combined with often ill thought out development means that in order to live in Horndean, it is necessary to have a car. Services and facilities are generally not close to most residents.

POPULATION AND HOUSING:-

POP1 - Further explore whether exceptional circumstances exists to be able to devise a revised local housing requirement.

POP1a - Housing needs in the areas outside the South Downs National Park is artificially inflated due to the unmet need from the SDNP. The fact that the SDNP is a national park means that it is not penalised for not taking its full compliment of housing based on need. That unmet need should not be passed on to areas outside the SDNP- it should just be taken as a general constraint on development in SDNP areas.

POP2 - Yes.

POP2a - The government is revisiting the basis of assessment. There seems little point in binding a District to an artificially high calculation of housing need.

POP3 - None of the housing needs of East Hampshire's part of the SDNP.

POP3a - There is no penalty to the SDNP for not meeting its housing need as the fact of it being a national park falls within the general constraint policy.

POP4 - Do not offer to assist with any requests from our neighbours.

POP4a - For the Southern Parishes, the numbers for the PfSH revised housing figures are unknown. The Southern Parishes have seen a substantial amount of development. Development should be sustainably dispersed around the District but not forced on an area where there are local constraints.

#### TYPES OF HOUSING NEED:-

HOU1 - All three policies are an important part of providing the necessary homes for an aging population.

HOU2 - Unless there is a specific policy that will ensure the delivery of the right type of housing for an aging population, developers will not provide the same preferring to build 'market housing'. With suitable and sufficient properties available, a cycle can then ensure that as families grow up and leave home, parents can move to housing suitable for their needs thus freeing up family homes. Similarly smaller homes will then become available as their occupants move up the housing ladder.

HOU3 - Yes.

HOU4- There is a proviso that there should be the data available to drive what is built as adaptable housing. It needs to be an informed policy.

HOU5 - Yes.

HOU5a - 2-3 bed homes. There is a need for both types of homes but the provision of 2-3 bed homes would seem to provide more flexibility for development.

HOU6 - All development sites.

HOU6a - Balanced communities are required and the need is for more smaller homes. There would seem to be little incentive to developers to build smaller homes and thus there is a need to force the position.

HOU7 - Stay the same.

HOU7a - This figure has been in place for some time now in East Hampshire with such housing being spread across a development. It results in a balanced community plus a contribution towards satisfying housing need.

HOU8 - We are not in a position to comment on other forms of housing.

#### ENVIRONMENT:-

ENV1 - All four are crucial and are important to conserving and enhancing green infrastructure. Without the landscape and habitat, there will be no species or green infrastructure.

#### INFRASTRUCTURE:-

INF1 - All eight identified types of infrastructure are crucial to a sustainable community.

INF2 - Happy.

INF3 - A mix of these with development being appropriate to the proposed location. In the right place, a large site provides the best infrastructure for a place where people wish to live and work and that is an asset to an existing community.

INF3a - See reply to 3 above.

DEVELOPMENT OPTIONS:-

DEV1 - Option 1, Option 2, Option 3 and then Option 4.

DEV2 - That order seems a logical way to allocate development with a view to achieving a good and sustainable community for both existing and new residents.

DEV3 - We are not qualified to comment.





# Medstead Parish Council

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12<sup>th</sup> January 2023

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

Dear Sir

## **Response of Medstead Parish Council, being a constituent part of the Medstead & Four Marks Steering Group (NPSG), to the East Hampshire District Council's document entitled: "ISSUES AND PRIORITIES REGULATION – PART 1"**

Medstead Parish Council welcome the opportunity to contribute to this consultation. As many of the issues raised are necessarily complex, we have chosen to respond by way of this letter.

In the main, we support the proposals in the "ISSUES AND PRIORITIES REGULATION – PART 1" document. In particular we support the emphasis and priority that the Council have given to policies to mitigate the impact of climate change and improve the quality of our local environment.

We also understand that EHDC are not reconsulting on many of the topics or sites previously considered in 2019 and that the information and opinions that were shared with EHDC at that time remain part of the preparation of this Local Plan and are not lost. We would ask that particular note is taken of the following three documents that we have previously submitted:

- i) The NPSG response to the EHDC Settlement Policy Boundary Review Draft Methodology – June 2017
- ii) The NPSG response to the EHDC Draft Local Plan consultation – March 2019.
- iii) The NPSG response to the EHDC consultation on the 10 Large Sites – October 2019.

However, there are a number of important issues raised by the "ISSUES AND PRIORITIES REGULATION – PART 1" document that we would like to comment on. These are as follows:

- i) The Quantum of Housing
- ii) The Affordability Ratio
- iii) The Four Options

- iv) Affordable Housing
- v) Settlement Hierarchy
- vi) Brownfield

## 1. THE QUANTUM OF HOUSING.

We are concerned that the target for new houses specified in the document does not reflect the real, current need of the district and has been set at an unnecessarily high level under the current Standard Calculation.

We believe that further consideration should be given to the following issues:

- i) The national park covers 57% of the district but currently takes a fraction (just one sixth) of the JCS Local Plan's allocated homes.

We fully support the statement made by the Leader of East Hants District Council when he said (in the article in the Alton Herald of 15 December 2022),

*"It has long been our opinion the government method to calculate housing figures is inadequate and unfair for areas like East Hampshire. This is especially when you consider our relationship with the South Downs National Park. The national park covers 57% of the district but takes a fraction of the allocated homes."*

- ii) The current housing requirement for each local authority is based on out-dated information. Furthermore, these 2014 household projections are based on the 2011 census. Now that the 2021 census data is available, we recommend that the future housing needs for the next 15 years should be based on the most up-to-date data.
- iii) This consultation is premature in view of the letter of 5 December 2022 from DLUHC to all MPs. The housing targets have always been the starting point for local plans and this letter indicated a move to "advisory" housing targets and allowing departures for exceptional circumstances. The change from in reality mandatory to advisory housing targets, as set out in the DLUHC letter means that this Consultation is effectively out of date as regards housing numbers as the official numbers will become only the starting point. It seems that departures from this starting point will be permitted at Examination if to take account of factors such as local constraints, the character of the local plan area and concerns of the local community.

We recommend that both the total numbers for the District and the split between the National Park and the LPA are reviewed and are the starting point before any strategic delivery options can be considered and decisions made. Therefore, EHDC should follow the example of other LPAs and wait for government clarification of changes to the NPPF and especially how the LDP 15 year housing target will be derived going forward.

## 2. THE AFFORDABILITY RATIO.

The Affordability Ratio is one of the key aspects of the Standard Method of calculating housing need that we believe to be 'unfair'. According to the HEDNA, the target for housing in East Hampshire needs to be increased by 66% over and above the projected need of the inhabitants of East Hampshire. We believe that that is an unjustifiable burden on the local residents.

We also believe that the fundamental rationale for the Affordability Ratio is flawed. The rationale put forward is that a significant increase in the supply of housing will lead to a material reduction in

the price of housing, making housing more affordable to the many local residents who are currently priced out of the market.

We can find no evidence to support this thesis. In fact, the data suggest the opposite. According to the census data, over the last 10 years, the number of households in East Hampshire grew by over 11%. During this time, the number of households in Four Marks/South Medstead grew by over 25%. In neither area is there any evidence that this increase led to a reduction in house prices. Indeed, the data suggest the opposite. In the same period, house prices in the GU 34 area, have gone **up** by over 30%.

There are a number of reasons as to why the market may have responded in a way that is diametrically opposite from the one that was posited. We highlight two of them:

- i) The Affordability Ratio has a built in incentive for developers to build more expensive houses. The algorithm used means that the more houses that are built above the median house price the greater the number of houses that the LPA is required to get built.
- ii) These houses are attractive to those who want to move out of London. For those who have sold at London prices, this is an attractive opportunity to move to the countryside. This then prices local residents out of the market.

With regard to the detail of the calculation of the Affordability Ratio, we are also concerned about the data set that has been used to generate the figure of 14.51%. An analysis of the data included in the HEDNA suggests that

- Some of the trends implied by the data are unreliable
- The actual Affordability Ratio could be as low as 9.8%.

This is very significant, because a re-assessment of the Affordability Ratio could lead to a reduction of 112 dwellings pa or 1680 across the period of the Plan.

We recommend that the whole data set for the Affordability Ratio is subject to a rigorous review before any strategic options are considered.

### **3. AFFORDABLE HOUSING**

We recommend that the debate about Affordable Housing should be re-framed. It should be based on the principle of what people can afford. In other words, it should start with an analysis of what people earn – rather than being based on a discount from the market price. We welcome the recent EHDC ambition and statements on real affordability [Bringing affordable homes to East Hampshire | East Hampshire District Council \(easthants.gov.uk\)](https://www.easthants.gov.uk/news/bringing-affordable-homes-to-east-hampshire), rather than the government’s national 20% discount off market price. This is essential to meet the needs of the key groups - young couples; keyworkers; those in poor quality housing; and the retired.

The proposed new approach would define homes as affordable:

- For owners: if homes were priced no more than 4.5 times the median earnings for a couple in the District
- For renters: if the rent was no more than 35% of net household income

Policies should be designed to differentiate between ownership and renting.

- i) Ownership: the policy should be based on what can be afforded in terms of a mortgage. The calculation above indicates a figure of less than £300,000.

- ii) Private Rented: there is a need in East Hampshire for more rented housing. The policy should be based on earnings
- iii) Social rented housing: there is an urgent need in East Hampshire for more social rented housing. It is important to address the housing needs of the people who already live in the district but suffer from inadequate housing. This is a major issue and should be the focus of a number of policy initiatives.

#### 4. THE FOUR OPTIONS

The document entitled '*ISSUES AND PRIORITIES REGULATION – PART 1*' puts forward four different options for the distribution of new housing and asks the public to put them in the order of priority.

We do not believe that any of the options are the optimum approach for the distribution of new housing in East Hampshire, whatever the final 15 year Housing Market may be. Our recommendation is that at least one alternative option should be considered. This Option 5 would focus on the key demographic trends in East Hampshire which confirm the need for smaller, low cost accommodation.

#### **Option 5: Focus new development on providing smaller, low cost accommodation to meet the needs highlighted by the demographic trends**

There are important demographic trends forecast for East Hampshire (c.f. the HEDNA) which confirm the need for smaller, low cost accommodation. The main areas of need are:

- For the ageing population
- Young people trying to get on to the housing ladder
- Those with no or low quality housing
- Keyworkers on low wages

#### **a) The Ageing population**

This is the most significant trend identified in the HEDNA. As Table 6.12 shows, 66% of the forecast growth in population in East Hampshire will come from the population of '65 and over'.

**Table 6.12 Population change 2021 to 2038 by broad age bands – East Hampshire (linked to delivery of 632 homes per annum)**

Age Group	2021	2038	Change in population	% change from 2021
Under 16	22,288	23,990	1,702	7.60%
16-64	72,234	77,059	4,825	6.70%
65 and over	29,956	42,990	13,034	43.50%
Total	124,478	144,038	19,560	15.70%

It is also noticeable that the forecast increase in the population of '65 and over' is 13,034. Assuming that the average members of these households will be 3 or less that indicates a need for 4,344 homes. This suggests that most (if not all) the new housing in the Local Plan should be built for this group.

This group is not homogeneous. As it represents such a large percentage of the forecast growth, it is important that policies are designed for each of the component parts

- The fit and healthy (who want to down-size)
- Those that wish to move to a community for senior citizens
- Care homes
- Nursing homes.

**b) Young people trying to get on to the housing ladder**

The HEDNA does not split out the increase in population for this group, but it is well known that there is a significant number of young people who cannot buy a home because they are generally far too expensive.

Many people in this category will be looking to buy a property at or below the maximum that they can secure for a mortgage based on median earnings. As discussed above this is likely to be under £300,000.

The HEDNA does highlight that some categories of market homes do meet this criterion. As can be seen from Table 2.2 below both flats and terraced houses are generally available at this more affordable level, and “in character” of this type should be encouraged.

**Table 2.2 Median House Prices, 2021**

	Detached	Semi	Terraced	Flat	All Sales
East Hampshire	£575,000	£376,750	£295,000	£207,500	£412,500
South East	£539,950	£359,950	£290,000	£210,000	£360,000
Differential	£35,050	£16,800	£5,000	-£2,500	£52,500
England	£385,000	£243,500	£215,000	£230,000	£274,000
Differential	£190,000	£133,250	£80,000	-£22,500	£138,500

*Source: Icen Analysis of ONS Small Area House Price Statistics, Year Ending March 2021*

**c) Those with no or low quality housing**

The data shown in the Affordable Housing Strategy indicates that Hampshire Homes Register calculate that there is a need for 1,640 homes for people on their register. The data shows that over 80% of the need is for 1 or 2 bedroom accommodation.

The Council has identified over 600 parcels of land in its ownership. Most are small and unsuitable for development, however, some warrant further investigation into their development potential. As stated in the Strategy, the distribution of new housing in the Local Plan should be based on feasibility studies undertaken to establish which of these have the greatest potential for affordable housing development.

The Local Plan should also include policies for all relevant forms of tenure with particular emphasis on Social Rented Housing.

#### **d) Keyworkers**

There are many keyworkers who live in the District who have difficulty in accessing affordable housing.

There is a real urgent need to provide affordable opportunities to this group of people either to purchase, equity share, or rent at an affordable price.

**We therefore recommend that in reviewing the strategy for the distribution of new housing consideration be given to Option 5.** This would focus on delivering new housing to meet the critical needs of these groups who form the community's housing need, rather than a high margin demand for yet more commuter executive homes for those moving out of cities and large towns.

Whilst these are very disparate groups, they tend to have one thing in common – they have a need for smaller, lower cost accommodation.

We therefore recommend that the policies in the Local Plan on the distribution of housing should cover all nature of tenures (include Social Rent; Affordable Rent; Intermediate Rent; Shared Ownership; Shared equity and Rent to Buy) and focus on delivering dwellings that are

- 1-2 bedroom
- Terraced
- Flats
- At a price that someone on median earnings can secure a mortgage for.
- At a rent that is no more than 35% of their net earnings

In terms of the location of the new housing, these groups would clearly benefit from living in existing urban areas where they would have ready access to all the facilities that they will need to meet their everyday requirements.

### **5. SETTLEMENT HIERARCHY/THE 20 min NEIGHBOURHOOD**

Option 1 (for the distribution of new housing) of the issues and Priorities document recommends a new settlement hierarchy based on the concept of a 20 minute neighbourhood as described in the Settlement Hierarchy Background paper published by EHDC for the purposes of Local Plan Regulation 18 Consultation, November 2022 - January 2023.

We find the principle of a 20 minute Neighbourhood appealing and it is a popular concept in the Planning trade press/websites and for a number of LPAs and communities. However, the proposed application of 20 minute neighbourhoods has been in larger urban locations, not semi-rural villages the size of Four Marks and Medstead.

Therefore, we do not believe that it would be practical in Four Marks/South Medstead for the following reasons:

- a) The Settlement Hierarchy paper acknowledges that the 20 min Neighbourhood is impractical and extends the concept to a 30 minute Neighbourhood.
- b) The paper acknowledges that Four Marks/ south Medstead is an 'anomaly' and does not even 'fit' a 30 min Neighbourhood.
- c) The proposed 30-minute round trip is calculated on the basis of 'how the crow flies'. In FM/SM this does not reflect the physical layout and therefore real timescales.
- d) Most of the main daily activities (defined by the TCPA) do not take place within the settlement

- e) There is very little evidence that 20 min Neighbourhood will be practical in a rural area.
- f) Any consideration of the most relevant distance must take into account the aging population
- g) Significant 'behaviour change' needs to be well established for this concept to succeed.
- h) There is a risk that the approach increases house prices.
- i) The data in Appendix D is only a snapshot in time.
- j) The data in the evidence base contains a significant number of factual errors
- k) The methodology used for Appendix D significantly distorts the key conclusions


Further details supporting these points are included in Appendix 1.

## 6. BROWNFIELD

Govt policy is to give priority to 'brownfield sites. As Minister of State for LUCH states in his Written Statement of 6 December *"The new Infrastructure Levy will be set locally by local planning authorities. They will be able to set different Levy rates in different areas, for example lower rates on brownfield over greenfield to increase the potential for brownfield development. That will allow them to reflect national policy, which delivers our brownfield first pledge by giving substantial weight to the value of using brownfield land.*

We recommend that the distribution of new housing should start with a full and proper assessment of all the brownfield sites in the district, to update the existing incomplete Brownfield Register.

Yours faithfully,

  
Clerk to Medstead Parish Council

Tel: 

[www.medsteadpc.org](http://www.medsteadpc.org)

## THE SETTLEMENT HIERARCHY

The comments below relate to the Settlement Hierarchy Background paper published by EHDC for the purposes of Local Plan Regulation 18 Consultation, November 2022 - January 2023. That paper forms the basis for the new settlement hierarchy that is proposed in support of the recommendations in Option 1.

### i) The Principle

In the ISSUES AND PRIORITIES REGULATION – PART 1 21 November 2022 - 16 January 2023 document (I&P) it states (on Page 19) that

*“The Council’s declaration of a climate emergency puts renewed emphasis on reducing travel distances and increasing opportunities for walking and cycling as a means of transport. Whilst the increased use of electric vehicles will help to lower emissions, the truth is that there are still greenhouse gases associated with their use and production. The challenge of meeting net-zero emissions is also a challenge to walk and cycle more frequently to access local destinations.*

*For this reason, we have produced a new settlement hierarchy for the emerging Local Plan that emphasises accessibility on foot and by bike, to enable people to live more locally in the future. Further information on “living locally” is provided in the settlement hierarchy and climate change background papers, but in summary living locally picks up on some of the key ideas from “20-minute Neighbourhoods”:*”

The NPSG welcome the emphasis on addressing climate change and, in principle, support the concept of a '20 minute Neighbourhood'

As it states in the TCPA document the benefits of the '20 minute Neighbourhood' approach are multiple: *“people become more active, improving their mental and physical health; traffic is reduced, and air quality improved; local shops and businesses thrive; and people see more of their neighbours, strengthening community bonds.”*

These are benefits that all communities would welcome.

However, the NPSG have some major reservations about the new settlement hierarchy that is based on the concept of the 20 min Neighbourhood.

### ii) Implementation is impractical in Four Marks/South Medstead

The NPSG believe that a 20min Neighbourhood would be impractical in Four Marks/South Medstead

- a) The paper acknowledges that the 20 min Neighbourhood is impractical and extends the concept to a 30 minute Neighbourhood.** The Settlement Hierarchy paper (at 3.3) states that:

*“Initially, a 20-minute neighbourhood area based on 800m distances – this being a 20-minute round trip on foot – was investigated, but this was found to exclude many residential areas within the larger settlements..... As such, a compromise position of using 1,200m distances to define a 20-minute neighbourhood has been applied.”*



There is no evidence base to support an approach based on 1,200m i.e., a 30 minute Neighbourhood. This is confirmed by the Olsen paper referred to above: *“There was little benefit in increasing the 10-min walking distance to 15-min for improving access to a range of facilities and amenities in rural areas”*

**b) The paper acknowledges that Four Marks/ south Medstead is an ‘anomaly’ and does not even ‘fit’ a 30 min Neighbourhood.**

At 4.2 and 4.3 the paper highlights that Four Marks/South Medstead does not fit the template

*“application of the ‘20-minute neighbourhood area’ for Four Marks and South Medstead was unusual..... The Four Marks & South Medstead anomaly has the potential to skew the results by failing to adequately represent potential accessibility to services”*

**c) The 30 minute round trip is calculated on the basis of ‘how the crow flies’. In FM/SM this does not reflect the real timescales.**

Four Marks and south Medstead is a linear settlement along two miles of the A31, with a major mobility barrier of the historic “Watercress” railway lines crossed by single carriage-way vehicle bridges in two locations at either end of the settlement with dangerous narrow pedestrian walkways, and a pedestrian bridge at Medstead & Four Marks station.

We have carried out a project to assess the real time taken to walk between key points within the settlement and can confirm that few of them can be completed within the proposed 30mn round trip.

**d) Most of the main daily activities (defined by the TCPA) cannot take place within a 20 min or 30 min Neighbourhood.**

As the TCPA document makes clear, the concept will only work when the main daily activities are within the 20 minute range. They highlight “six essential social functions as crucial to sustaining a high quality of urban life: living, working, commerce, healthcare, education, and entertainment.”

This would only be possible in the Tier 1 settlements. For all the other settlements most of these ‘main daily activities’ take place well outside the 30 min Neighbourhood.

- Working: a recent survey shows that 75% of residents commute out of the settlement for their work
- Shopping: most residents carry out their main shopping outside the settlement. One reason for this is that the cost of goods bought in Alton are significantly cheaper than those in Four Marks. A recent survey has confirmed that on a range of 8 branded grocery products a leading supermarket in Alton was over 10% cheaper than one of the major convenience stores in Four Marks. Additionally, the price petrol bought at supermarkets in Alton makes the trip attractive.
- Secondary schools: there are no secondary schools in Four Marks/South Medstead

- Primary schools: the primary school in Four Marks is on the extreme edge of the settlement. The primary school in Medstead cannot expand.
- Entertainment: There is no theatre, cinema or pub in Four Marks/South Medstead.

**e) There is very little evidence that 20 min Neighbourhood will be practical in a rural area.**

(c.f. Nationwide equity assessment of the 20-min Neighbourhood in the Scottish context: A socio-spatial proximity analysis of residential locations Jonathan R. Olsen, Lukar Thornton, Grant Tregonning, Richard Mitchell<sup>1</sup>)

**f) Any consideration of the most relevant distance must take into account the ageing population.**

As the HEDNA makes clear the main demographic trend over the next few years will be an increase in the 65+ age group. Any concept of accessibility on foot must take this into account.

**g) Significant 'behaviour change' needs to be well established for this concept to succeed.**

In the Town & Country Planning Association document, *20-Minute Neighbourhoods Guide Creating Healthier, Active, Prosperous Communities An Introduction for Council Planners in England*, 2021<sup>2</sup>, and is aware of the barriers for developing successful 20MN, recorded in Section 7

The document identifies the key blockers associated with:

- Intra- and cross-organisational governance
- Planning and development policy and enforcement
- Making greenfield developments work within broader geographic scales
- Investment, funding, and budgetary constraints
- Resident/user perception and the need for behaviour change

This highlights to critical importance of behaviour change amongst local residents. Without this, the concept will fail.

**h) There is a risk that the approach increases house prices.**

The various studies that have been carried out into 20 Neighbourhoods all point to the risk of them becoming too attractive. If the location becomes too popular, then the housing will become more expensive. With the Affordability Factor already high locally, this would not be a help to our communities.

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<sup>1</sup> **Nationwide equity assessment of the 20-min neighbourhood in the Scottish context: A socio-spatial proximity analysis of residential locations (Jonathan R Olsen Lukar Thornton Grant Tregonning , Richard Mitchell)**  
<https://pubmed.ncbi.nlm.nih.gov/36368061/>

<sup>2</sup> **The Town & Country Planning Association: 20-Minute Neighbourhoods Guide Creating Healthier, Active, Prosperous Communities An Introduction for Council Planners in England**, 2021  
[https://tcpa.org.uk/wp-content/uploads/2021/11/final\\_20mnguide-compressed.pdf](https://tcpa.org.uk/wp-content/uploads/2021/11/final_20mnguide-compressed.pdf)

**i) The data in Appendix D is only a snapshot in time.**

Many of the criteria on which the scoring in Appendix D is based change frequently over time. It is not a sound basis for a long term plan.

**j) The data in the evidence base contains a significant number of factual errors**

In the Settlement Hierarchy paper (at 4.1.) it says that *"Table 2 (below) highlights the ranking of the settlements in accordance with the scores from Appendix D. These scores are based on the three-stage methodology that has been described in this background paper"*

There are too many errors contained in Appendix D for there to be any confidence in drawing conclusions from this data set. For example, it states that there are no churches in Headley or Lindford; and there is no dentist in Clanfield.

**k) The methodology used for Appendix D significantly distorts the key conclusions.**

The methodology used states that the maximum score for any settlement is 2.

We believe that this approach distorts the data. For example, we believe it would give a more accurate comparison if the data was based on the actual number of a particular facility. The data presented in Appendix D suggests that Four Marks/ south Medstead has 59% of the facilities of Alton. However, if both settlements were measured on the basis of the actual number of facilities available, this would give a score of 233 vs 44 – or showing Four Marks/South Medstead having 17% of the facilities of Alton. We consider this to be a more accurate reflection of the size of the two settlements.

Our Ref: [REDACTED]

13 January 2023



East Hampshire District Council

[LocalPlan@easthants.gov.uk](mailto:LocalPlan@easthants.gov.uk)**via email only**

Dear Sir / Madam

**Local Plan Issues and Priorities Consultation  
November 2022 – January 2023  
Representations on behalf of National Grid**

National Grid has appointed Avison Young to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

**About National Grid**

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators, so it can reach homes and businesses.

National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.

National Grid Ventures (NGV) is separate from National Grid's core regulated businesses. NGV develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States.

**National Grid assets within the Plan area**

Following a review of the above Development Plan Document, we have identified one or more National Grid assets within the Plan area.

Details of National Grid assets are provided below.

**Electricity Transmission**

Asset Description
VB ROUTE TWR (004 - 122): 400Kv Overhead Transmission Line route: FLEET - LOVEDEAN 1
4VF ROUTE TWR (001 - 190): 400Kv Overhead Transmission Line route: BOLNEY - LOVEDEAN 1
Electrical Substation: LOVEDEAN 400KV
Electrical Substation: LOVEDEAN 132KV
4YE ROUTE TWR (023 - 065): 400Kv Overhead Transmission Line route: BOTLEY WOOD - LOVEDEAN

A plan showing details and locations of National Grid’s assets is attached to this letter. Please note that this plan is illustrative only.

Please also see attached information outlining further guidance on development close to National Grid assets.

**Utilities Design Guidance**

The increasing pressure for development is leading to more development sites being brought forward through the planning process on land that is crossed by National Grid infrastructure.

National Grid advocates the high standards of design and sustainable development forms promoted through national planning policy and understands that contemporary planning and urban design agenda require a creative approach to new development around high voltage overhead lines, underground gas transmission pipelines, and other National Grid assets.

Therefore, to ensure that future Design Policies remain consistent with national policy we would request the inclusion of a policy strand such as:

*“x. taking a comprehensive and co-ordinated approach to development including respecting existing site constraints including utilities situated within sites.”*

**Further Advice**

National Grid is happy to provide advice and guidance to the Council concerning their networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.

To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets. Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect National Grid’s assets. We would be grateful if you could check that our details as shown below are included on your consultation database:





[nationalgrid.uk@avisonyoung.com](mailto:nationalgrid.uk@avisonyoung.com)

Avison Young  
Central Square South  
Orchard Street  
Newcastle upon Tyne  
NE1 3AZ

[box.landandacquisitions@nationalgrid.com](mailto:box.landandacquisitions@nationalgrid.com)

National Grid  
National Grid House  
Warwick Technology Park  
Gallows Hill  
Warwick, CV34 6DA

If you require any further information in respect of this letter, then please contact us.

Yours faithfully,



**For and on behalf of Avison Young**

National Grid is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

#### Electricity assets

Developers of sites crossed or in close proximity to National Grid assets should be aware that it is National Grid policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance.

National Grid's '*Guidelines for Development near pylons and high voltage overhead power lines*' promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here: <https://www.nationalgridet.com/document/130626/download>

The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

National Grid's statutory safety clearances are detailed in their '*Guidelines when working near National Grid Electricity Transmission assets*', which can be downloaded here: [www.nationalgridet.com/network-and-assets/working-near-our-assets](http://www.nationalgridet.com/network-and-assets/working-near-our-assets)

#### Gas assets

High-Pressure Gas Pipelines form an essential part of the national gas transmission system and National Grid's approach is always to seek to leave their existing transmission pipelines in situ. Contact should be made with the Health and Safety Executive (HSE) in respect of sites affected by High-Pressure Gas Pipelines.

National Grid have land rights for each asset which prevents the erection of permanent/temporary buildings, or structures, changes to existing ground levels, storage of materials etc. Additionally, written permission will be required before any works commence within the National Grid's 12.2m building proximity distance, and a deed of consent is required for any crossing of the easement.

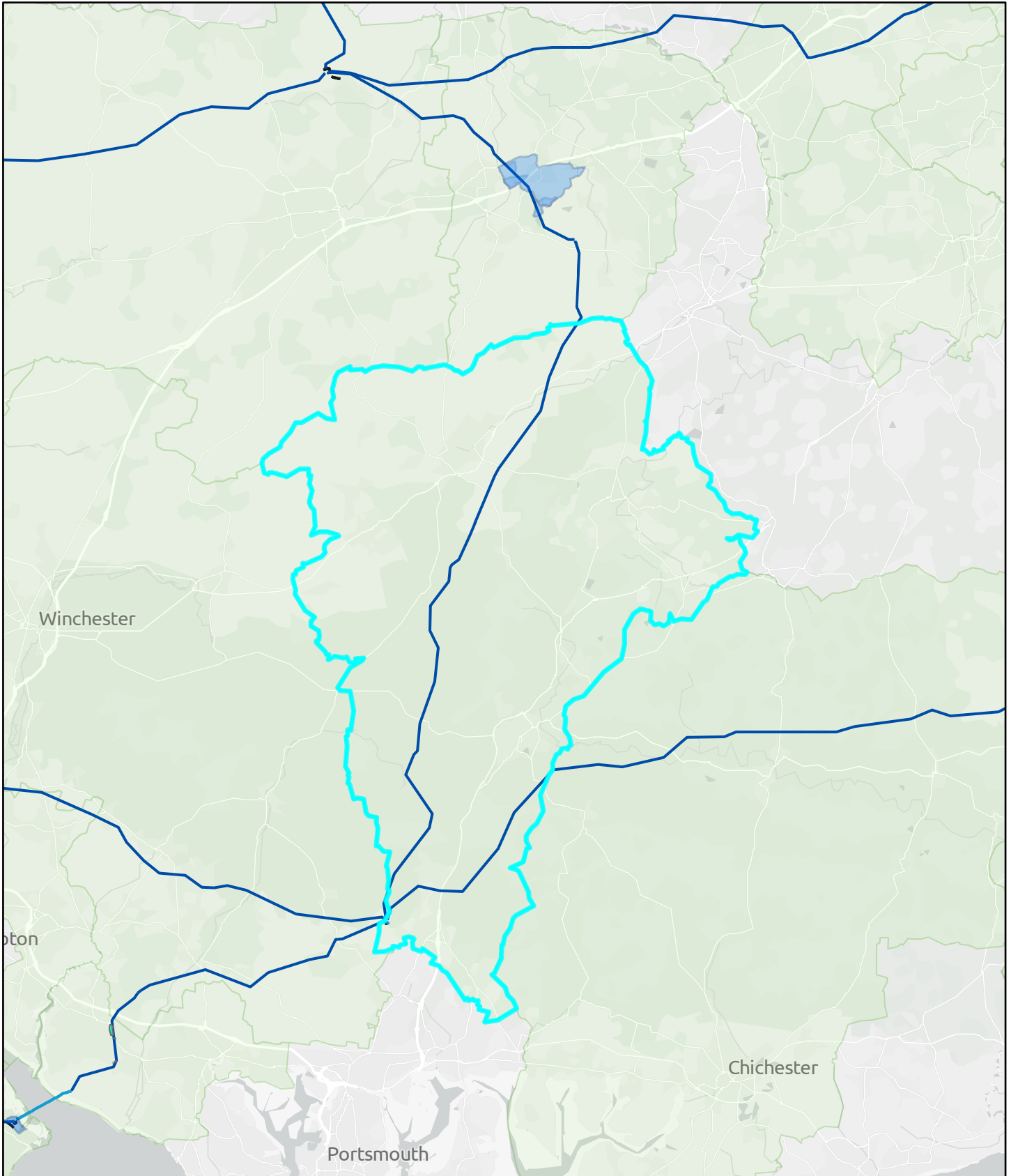
National Grid's '*Guidelines when working near National Grid Gas assets*' can be downloaded here: [www.nationalgridgas.com/land-and-assets/working-near-our-assets](http://www.nationalgridgas.com/land-and-assets/working-near-our-assets)

#### How to contact National Grid

If you require any further information in relation to the above and/or if you would like to check if National Grid's transmission networks may be affected by a proposed development, please visit the website: <https://lsbud.co.uk/>

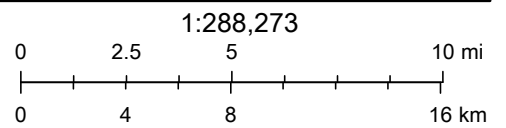
For local planning policy queries, please contact: [nationalgrid.uk@avisonyoung.com](mailto:nationalgrid.uk@avisonyoung.com)

# East Hampshire Local Plan Issues and Priorities Consultation



13/01/2023, 13:27:38

- Development\_Plan\_Monitoring\_v2\_7386
- Archived\_Sites\_2848
- Electric\_Assets\_4020
- Electric\_Assets\_7634
- 400
- 132 & Below
- 400



Contains OS data © Crown Copyright and database right 2022  
 Contains data from OS Zoomstack



**FORMAL RESPONSE** [REDACTED] **East Hampshire Local Plan**[REDACTED]  
Fri 13/01/2023 15:53

To: EHDC - Local Plan &lt;LocalPlan@easthants.gov.uk&gt;

1 attachments (120 KB)

Disposals\_Fact\_Sheet.\_April\_2020.pdf;

**CAUTION:** This email came from outside of the council - only open links and attachments that you're expecting.

**For the attention of:** Local Plan Team, East Hampshire District Council**Proposal:** East Hampshire Draft Local Plan – Issues & Priorities Consultation**Our Reference:** [REDACTED]

Dear Sir or Madam,

Thank you for inviting National Highways to comment on the Issues & Priorities consultation for the draft East Hampshire Local Plan.

National Highways has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such National Highways works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. We will therefore be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN, in this case the A3 which bisects the length of the district.

Overall, in accordance with national policy, we look to East Hampshire District Council to promote strategies, policies and land allocations that will support alternatives to the car and the operation of a safe and reliable transport network. We welcome the Council's vision to provide sustainable development whilst promoting active travel and public transport use to limit car journeys and congestion locally, and hopefully on the wider network. Whilst the locations within the East Hampshire area suitable for accommodating housing need are constrained by the unique needs of the South Downs National Park, housing should be spread out in such a way that does not excessively increase traffic on the SRN at a single location. Where there are significant traffic increases on the SRN in specific locations, we would require suitable mitigation to be agreed to accommodate for this additional traffic. We would encourage major developments to be focused on accessible locations served by a comprehensive public transport network and within walking distance of a wide range of jobs and services. It is important that the Local Plan provides the planning policy framework to ensure development cannot progress without the appropriate infrastructure being in place.

When considering proposals for growth, any impacts on the SRN will need to be identified and mitigated as far as reasonably possible. We will support a local authority proposal that considers sustainable measures, which manage down demand and reduce the need to

travel. Infrastructure improvements on the SRN should only be considered as a last resort. Proposed new growth will also need to be considered in the context of the cumulative impact from already proposed development on the SRN.

At this stage the Local Plan does not provide details or understanding of the impact to capacity at the local road network. The SRN needs to be added to this requirement as well as a need to assess capacity when required. To ensure that the Local Plan is deliverable, a transport evidence base should be provided to demonstrate the Local Plan impact on the SRN and as necessary identify suitable mitigation. This work will form a key piece of evidence to demonstrate the Local Plan is sound, therefore it is important that any identified mitigation has a reasonable prospect of delivery within the timescales of when the identified growth is planned. Once the transport impacts of the Local Plan sites are understood, the Infrastructure Delivery Plan document should set out any SRN mitigation required to deliver the Local Plan development. We would welcome the opportunity to discuss this with East Hampshire District Council ahead of the next Local Plan consultation.

We note the call for sites for gypsy, traveller and travelling showpeople accommodation, and the call for "green" sites. Please note that we do not put forward sites for consideration as part of the Local Plan process. There is a formal process, which is followed, when the property that has been declared surplus to National Highways requirements it is placed on the Register of Surplus Public Sector Land. The link to this and more information about purchasing our land is contained within the attached fact sheet. Our surplus land that will be progressed for sale can more easily be viewed on the <https://www.gov.uk/find-government-property> website, which also contains surplus property from other government departments and public bodies. Each property provides caseworker contact details to obtain more information. It is also worth noting that when our property is placed on the open market, our agents will market widely using all the usual channels, including the large property portals such as onthemarket.com or rightmove.co.uk.

For enquiries about all other land, you will need to identify the specific area that you require and confirm that it is owned by us via the Land Registry. Please then send a detailed enquiry to [REDACTED] who will assess the request on a case by case basis. You will need to provide a map showing the extent of the land required and the reason it is required, and be prepared to apply to change the allocated planning use if necessary before we can declare the land surplus to our requirements and progress the sale.

We would also like to emphasise that we should be consulted on any sites which are anticipated to place vehicle trips through SRN junctions. We shall also have an interest in any sites that are identified that share a boundary with the SRN. If this is the case, we would wish to be further consulted on the potential inclusion of these sites in the Local Plan, in relation to the potential for drainage, boundary, fencing issues, etc in relation to the SRN.

National Highway supports East Hampshire District Council's commitment to work with partners to consult on potential developments coming forward within the borough. We look forward to continuing the ongoing work with all parties to identify and produce a robust transport strategy which would inform the size and scale of development deliverable within East Hampshire up to and beyond the Local Plan process.

I hope this is helpful.

Regards

[REDACTED]

**Web:** <https://nationalhighways.co.uk/our-roads/planning-and-the-strategic-road-network-in-england/>

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**National Highways Limited | General enquiries: 0300 123 5000 | National Traffic Operations Centre, 3 Ridgeway, Quinton Business Park, Birmingham B32 1AF |**  
<https://nationalhighways.co.uk> | [info@nationalhighways.co.uk]info@nationalhighways.co.uk

*Registered in England and Wales no 9346363 | Registered Office: Bridge House, 1 Walnut Tree Close, Guildford, Surrey GU1 4LZ*

Consider the environment. Please don't print this e-mail unless you really need to.

## **Fact Sheet: How we deal with enquiries about our property**

### **Is the property surplus**

We hold property for operational use and we need to confirm whether the property is currently operational, required for future use or no longer required.

When property is not currently being used for operational purposes, but will be in the future, we may be able to let it. This will be through our managing agent.

If the property is declared surplus we follow government guidelines for the disposal of surplus property.

It is important to understand that we cannot give any promises that the property you have identified will be sold in a specific time or that you will have the opportunity to purchase it. The reasons for this are explained below.

### **The Register of Surplus Public Sector Land**

All surplus property is placed on the Register to see whether it could be used by another Government Department or Public Body.

You can view the Government website listing these properties here:

<http://data.gov.uk/dataset/epims>

### **Crichel Down Rules**

If we have purchased property for an improvement to the trunk road and motorway network using compulsory powers or under the blight provisions of the Town and Country Planning Act, we have to consider the Crichel Down Rules. All our surplus property is subject to an assessment under these rules and this means we have to consider offering it back to the former owner or their successor. It will only be sold by other means if the rules don't apply, or if the former owner does not wish to re-purchase the property, or, we cannot agree terms with them. This means that if negotiations with the former owner are successful, the property will not be sold on the open market. You can view the latest version of the Crichel Down Rules here:

<https://www.gov.uk/government/publications/compulsory-purchase-and-the-crichel-down-rules-circular-06-2004>

### **Disposal Programme**

All our sales are prioritised and we may not be able to give you an immediate indication about when a property will become available for sale. If the property you have identified is declared surplus we will record your interest at that time.

## **Managing Public Money**

Sales are always at market value and must comply with the instructions in a Treasury document called Managing Public Money. This is to ensure we achieve best value for the taxpayer. You can view the document here: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/835558/Managing\\_Public\\_Money\\_MPM\\_with\\_annexes\\_2019.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/835558/Managing_Public_Money_MPM_with_annexes_2019.pdf)

In cases when the cost of the disposal outweighs the value of the land we may require the purchaser to meet our professional costs.

## **Government Property Finder**

This website was launched in August 2014 and lets members of the public see what government property is available to buy or rent and operates similarly to commercial sites such as 'Rightmove' in that you will be able to find available property using either a postcode or area keyword.

You can access the site here: <https://www.gov.uk/find-government-property>

## **Residential Property**

We may offer our residential tenants an opportunity to buy the property they are renting. If the house is empty or the tenant is not interested or successful in buying the property and it is suitable for social housing, we may offer it for sale to the local housing authority or a social housing provider.

## **Special Purchaser**

If our professional valuer advises us that there may be a special purchaser who would be prepared to pay more than could otherwise be obtained, we may negotiate directly with them. This is usually adjoining owners or developers.

## **Open Market Sales**

If the property has not been sold to the former owner, tenant, local housing authority, social housing provider or special purchaser the property is usually advertised for sale publicly through our contracted estate agent or via an auction. It is at this stage the property becomes available to the general public.

Date: 16 January 2023  
Our ref: [REDACTED]  
Your ref: N/A



Customer Services  
Hornbeam House  
Crewe Business Park  
Electra Way  
Crewe  
Cheshire  
CW1 6GJ  
T 0300 060 3900

East Hampshire District Council

**BY EMAIL ONLY**

Dear Sir/Madam

### **Local Plan Issues and Priorities - Regulation 18 Part 1**

Thank you for your consultation on the above dated 21 November 2022 which was received by Natural England on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Our comments on the Habitats Regulations Assessment (including the interim Sustainability Appraisal scoping report) and the Issues and Priorities document are made below.

#### Comments on the Habitats Regulations Assessment screening of the Issues & Priorities

##### ***Chapter 1: Introduction***

Natural England are content with the background, legislation and scope of the project detailed in this chapter of the Habitats Regulations Assessment (HRA) screening.

However, it would be appropriate to mention, under the list of relevant European sites detailed in paragraph 1.14, Thames Basin Heaths SPA and Thursley, Ash, Pirbright & Cobham SAC which are located approx. 3.3km north-east of East Hampshire District in the adjoining authority of Hart. Mention of these sites are later discussed in the following chapters, and as such their recognition as important protected sites to consider through the HRA would be advised to be incorporated here in Chapter 1.

##### ***Chapter 5: Screening for Likely Significant Effects (LSEs)***

- *Recreational Pressure*

##### *Wealden Heaths Phase II SPA, Woolmer Forest SAC and Shortheath Common SAC*

Natural England are content with the conclusions met that LSEs of the Reg.18 Local Plan on the Wealden Heaths Phase II SPA regarding disturbance cannot be excluded for any of the growth options. Further assessment of this impact pathway through Appropriate Assessment will be required.

Natural England have discussed in previous consultations that we would not support residential development within 400m of the Wealden Heaths Phase I or Phase II SPA since mitigation is unlikely to be effective. We would expect reference to this 400m buffer made in this section of the

HRA and/or taken forward to the next HRA stage (AA). Natural England have confirmed that a 5km catchment for the SPA and SACs will be adopted going forward, within which LSEs regarding recreational pressure cannot be excluded. We acknowledge that this is appropriately included in this screening.

#### *Thames Basin Heaths SPA*

East Hampshire District Council are not part of the Thames Basin Heaths (TBH) Avoidance and Mitigation Strategy, this means any developments that fall within 5km of TBH SPA (or within 7km and proposing 50+ dwellings), while also falling outside of the Wealden Heaths Phase I and II SPA 5km catchments, cannot contribute to the SANG and Strategic Access Management and Monitoring (SAMM) funding under the TBH Strategic Solution. In these circumstances Natural England advise that a case-by-case assessment will be necessary to determine the requirement for mitigation.

Natural England advise that the strategy for dealing with Wealden Heaths Phase I and Phase II SPA should be treated the same, remaining consistent with advice given to and the strategy taken forward with Waverley Borough Council. Where development falls within 5km of both Wealden Heaths Phase I SPA and TBH SPA then Wealden Heath mitigation should be provided. It is the opinion of Natural England that there is no need to double the mitigation requirement. Natural England are happy to work with East Hampshire District Council on this going through the stages of the Local Plan.

Natural England agree with the conclusions that LSEs of the Reg.18 Local Plan on the Thames Basin Heaths SPA regarding recreational pressure cannot be excluded for any of the growth options. Further assessment of this impact pathway through Appropriate Assessment will be required to demonstrate that any potential adverse impacts can be appropriately avoided or mitigated.

**Natural England disagree with the opposing conclusions made in *paragraph 5.10* that the emerging Reg.18 Local Plan Housing Options will not result in LSEs on the Thames Basin regarding recreational pressure. This is discussed further below.**

#### *Thursley, Hankley & Frensham Commons SPA and Thursley, Ash, Pirbright & Chobham SAC*

Thursley, Hankley & Frensham Commons SPA is otherwise referred to as the Wealden Heaths Phase I SPA. Natural England are of the opinion that both Wealden Heaths Phase I and Phase II SPA should be treated the same with recreational pressure catchments and mitigation requirements. *Paragraph 5.7* recognises the 400m development exclusion zone of which we advise should also be applied to the Wealden Heaths Phase II SPA. It also correctly recognises the 400m – 5km mitigation zone to match that of the Phase II SPA. Natural England would like to continue to work with East Hampshire District Council on the catchments and treatment of the Wealden Heaths Phase I and II SPA in regards to appropriate mitigation.

The southern designated site of Thursley, Ash, Pirbright & Cobham SAC overlaps with Thursley, Hankley & Frensham Commons SPA and therefore also with the combined Wealden Heaths Phase I SPA. Natural England are of the opinion that both Wealden Heaths Phase I and Phase II SPA should be treated the same with recreational pressure catchments and mitigation requirements.

**Natural England disagree with the conclusions that LSEs of the Reg.18 Local Plan on the Wealden Heaths Phase I SPA regarding recreational pressure can be excluded for any of the growth options. Further assessment of this impact pathway through Appropriate Assessment will be required to demonstrate that any potential adverse impacts can be appropriately avoided or mitigated.**

Natural England would like to continue to work with East Hampshire District Council on this going forward and would advise that a review of the supporting evidence behind the conclusions met in *paragraph 5.9 & 5.10* is conducted.

- *Atmospheric Pollution*

*Thursley, Hankley & Frensham Commons SPA and Thursley, Ash, Pirbright & Chobham SAC*

Paragraph 5.65 summarises that after a broad review of the road traffic infrastructure there are no major commuter routes within 200m of these sites that are likely to experience a significant increase in traffic volume due to the Reg.18 Local Plan.

**Natural England disagree with the conclusions that LSEs of the Reg.18 Local Plan on the Wealden Heaths Phase I SPA regarding recreational pressure can be excluded for any of the growth options. Further assessment of this impact pathway through Appropriate Assessment will be required to demonstrate that any potential adverse impacts can be appropriately avoided or mitigated.**

With the boundary of East Hampshire pressing in such close proximity to Thursley, Hankley & Frensham Commons SPA, otherwise known as Wealden Heaths Phase I SPA, we believe these sites cannot be excluded this early from potential LSE of this impact pathway. It can be viewed that this will be dependent on the Housing Option(s) taken forward, with Housing Option 1 showing potential to increase LSE for atmospheric pollution on these sites with greater scope for development near the north-east district boundary. Natural England welcome the opportunity to work together on this going forward.

### ***Chapter 6: Conclusions & Recommendations***

Natural England welcome the opportunity to continue to work with East Hampshire District Council on the emerging Local Plan to ensure the most robust recommendations and conclusions are met through the HRA.

### Comments on the Interim Sustainability Appraisal Scoping Report, 2018

Natural England consider that the Sustainability Appraisal (SA) is key to ensuring that a robust consideration of proposals and their alternatives is undertaken to confirm that the most sustainable development allocations are selected, considering all elements of sustainable development on an equal basis.

The SA in its conclusions identifies a total of 10 Key SA Objectives, as detailed in Figure 50 of the document. Please see below our comments on relevant SA objectives, assessment criteria and indicators.

#### *Objective 1 – Biodiversity*

It is recognised and acknowledged that the wording for this objective to ‘protect and enhance local, national and international nature conservation interests’, is correct to reflect national planning policy appropriately. It is welcomed and advocated to have green infrastructure incorporated under this key objective.

#### *Objective 2 & 3 – Climate Change Mitigation & Climate Change Adaptation*

Natural England welcome these key objectives in tackling and facing climate change. A proactive approach to mitigating and adapting to climate change should be sought, for example through sustainable forms of transport, promoting alternative means of travel, and avoiding/ reducing risk of flooding. We recognise that these key objectives follow clear national planning policy, and we welcome climate change mitigation and adaptation remaining a priority in emerging policy.

Nature-based solutions, as discussed above, form a key component for mitigating and adapting to



the impacts of climate change, however there are no ecological indicators suggested under this climate change objective. The enhancement and expansion of the local nature recovery network will be key to help species adapt to the effects of climate change and is key to sustainable development. It would therefore seem appropriate to make reference to biodiversity within Objectives 2 and 3, with appropriate indicators for monitoring. Natural England will be happy to advise further on this aspect.

#### *Objective 4 – Community and Wellbeing*

The health benefits that are gained from interaction with the natural environment are undeniable and a vital part for consideration in a Local Plan. These are well documented and there is significant potential for these to be an integral component to help manage health inequalities across East Hampshire. It would therefore seem appropriate for the inclusion of the impacts to the existing public rights of way network, accessible natural greenspaces/ suitable alternative natural greenspaces (SANGs) and new forms of green infrastructure are considered as part of the SA and detailed within this relevant Key Objective.

#### *Objective 8 – Landscape/ Townscape*

In recognising the importance of national planning policy and the protection and enhancement of SDNPA and Surrey Hills AONB, this objective is vital for preserving the tranquility of the landscape and its rural setting of small towns and villages. With the complex and high-value setting of East Hampshire's landscape, this Key Objective is vital and welcomed by Natural England.

#### *Objective 10 – Water*

It is recommended that clearer reference to water quality is made in East Hampshire District specific context for this objective, understanding the need for nutrient neutrality across the district. The terms 'nutrient neutrality' and/or 'nitrogen' should be used so that the terminology is in line with Natural England Solent Nutrients guidance document, as advised above.

#### Comments on the Issues and Priorities Regulation 18 document

##### ***Local Plan Vision***

Natural England welcome the fact that the climate emergency will be a key concern and focus for new Local Plan and that development coming forward will need to be net zero carbon and sustainable. We advise explicitly that the climate emergency must sit at the heart of the new Local Plan, recognising it as the key issue and priority to face.

We advise ultimately that the Local Plan in its Vision is strong in its acknowledgement of the climate and ecological emergencies currently underway and recognises the important role of the natural environment to deliver measures that reduce the effects of climate change and enable nature recovery. The Plan should have a clear aim to significantly and demonstrably improve the natural environment to ensure housing and infrastructure needs are met sustainably.

It is welcomed that the Council recognises the need to be in line with national policy and guidance and take account of any changes that the Government makes to the planning system whilst the Local Plan is evolving. This is imperative to ensure that the Council can continue to protect, enhance, and converse the environment while facilitating strategically planned sustainable development.

##### ***Development Strategy and Spatial Distribution – Housing Options***

Natural England agree with AECOMs conclusions that have been met within the HRA screening report, Appendix B, to confirm that Likely Significant Effects of all four Housing Options on European sites cannot be excluded. Natural England are happy to continue to work with East Hampshire District Council on these matters through the development of the Local Plan

## **Local Plan Objectives**

- Strategic Objective/ Vision: Carbon Neutrality

The Earth's climate is changing faster than it would otherwise be due to increased burning of fossil fuels for electricity, heating and powering transport, as well as large-scale land use change associated with agriculture. In the UK, the effects of climate change will include shifts in our seasons, hotter drier summers, warmer wetter winters, rising sea levels, more extreme weather events such as droughts, flash floods and strong winds, and changes to distribution of species and habitats.

An increasing number of local authorities across England are formerly declaring climate change emergencies, including East Hampshire District Council. The UK became the first country in the world to declare a climate emergency and the government have recently set in law a climate change target to cut emissions by 78% by 2035 compared to 1990 levels, which will bring the UK more than three-quarters of the way to net zero by 2050. National planning policy outlines the need for Plans to take 'a proactive approach to mitigating and adapting to climate change', that policies should 'support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts'. The Government's 25 Year Environment Plan sets out a goal for mitigating and adapting to climate change.

Natural England, therefore, welcomes the key objective of the Plan for carbon neutrality to be in line with the Government's targets in the Climate Change Act 2008. It is advised the Plan recognises and incorporates the role of the natural environment to help deliver climate mitigation and adaptation across the district. Please find more detailed advice on this aspect below.

- Strategic Objectives: Climate and Environment

Overall Natural England supports the objectives set out for the Local Plan that reflect the need for carbon neutrality, improving air and water quality, the requirement for biodiversity net gain, and the need for healthy communities with good access to green and blue infrastructure, as seen in the Climate and Environment Strategy 2020 – 2025. Please see specific comments on the objectives below.

The Plan should include an environmental objective to protect and restore local, national and international sites designated for nature conservation. Natural England recognise that the local authority will ensure sustainable development while supporting its residents and enterprises to reduce carbon emissions to net-zero by 2050.

It is also advised that the Plan's objectives also include protection and enhancement of landscapes, including the need to ensure development within the setting of the South Downs National Park does not compromise relevant National Park aims and objectives. With the clear fact that more than half of the district is under the authority of the South Downs National Park Authority (SDNPA), it is vital to make clear the collaborations and obligations required to work alongside one another. This should be pursued to seek protection, enhancement, and expansion of the ecological network across the district, going further to restore habitat rather than to just seek to halt its loss.

## **Key Issues and Priorities**

- Issue 1: Climate Emergency

It is welcomed that the Council has set ambitious targets to be net zero carbon by 2024 and the district to be net zero by 2030. It is welcomed that it is the intention of the local plan to 'prioritise and substantially reduce the district's carbon footprint'. The document sets out the potential for the local Plan to have a strategic policy on climate change and adaptation. Natural England would fully support the development of such a policy and recommend it will be key to enabling the Council to meet its zero carbon targets.

Natural England advise all Local Plans, in acknowledging the climate and ecological emergencies currently underway, recognise the important role of the natural environment to deliver measures that reduce the effects of climate change and enable nature recovery.

The Plan should make provision to secure appropriate reductions in carbon emissions over the Plan period to avoid further deterioration and make a clear commitment to net zero by an appropriate date that meets or exceeds the Government's international commitments.

In considering climate change 'mitigation' (reducing levels of greenhouse gases in the atmosphere) and 'adaptation' (preparing for and dealing with the consequences of climate change), we recommend that the Plan incorporates the role of the natural environment to address the effects of climate change. This can be delivered via the implementation of nature-based solutions, which involves the restoration of ecosystems for the long-term benefit of people and nature. Some examples of such measures can include the following:

- Woodland creation/restoration – ideally located on low-grade agricultural land, urban fringes and urban localities, connecting to existing woodland. Additionally, the removal of inappropriate plantation forestry on former ancient woodland sites or priority habitat should be facilitated
- Restoration/creation of other priority habitats such as meadow, chalk downland, floodplain and wetland.
- Natural floodplain management to alleviate flooding further downstream
- Retrofitting of green and blue infrastructure such as trees and sustainable urban drainage systems (SUDS) in urban localities to address heat island effects.

Please refer to Natural England's [Carbon Storage and Sequestration by Habitat](#) (April 2021) report for further information on the ability of natural habitats to provide climate mitigation. It is recommended the Plan makes provision for all sensitive habitats and species hotspots across the area to be catalogued (including protected sites, local nature reserves, agri-environment land and priority habitats); existing datasets, such as local ecological mapping, may already be available. These habitats can be looked at through Natural England's [Climate Change Adaptation Manual's](#) Landscape Scale Climate Change Assessment Tool. The [Climate Change Committee's Net-Zero Report](#) could also inform the process of developing an action plan.

Your authority can use such datasets to target areas for creation/restoration to enhance the Nature Recovery Network (NRN) across the area (please see further advice on NRNs and Local Nature Recovery Strategies in this letter) and identify specific projects that can be delivered. Such projects could potentially benefit from carbon offsetting contributions from development over the local plan.

It is recommended such measures are brought together into a strategic approach that delivers multifunctional benefits to people and wildlife that links to other aspects of the Plan, including green infrastructure implementation, health and wellbeing, delivery of biodiversity net gain, natural flood management, air and water quality benefits, as well as carbon sequestration (climate mitigation) and climate adaptation.

It is therefore Natural England's recommendation that the Plan outlines an ambitious climate-specific policy that sets appropriate and adaptive targets for carbon reduction targets and delivery of new/restored wildlife habitat and accessible green infrastructure for the long-term benefit of people and wildlife in the Plan area. Consideration should also be given to addressing issues on habitats and protected sites that will be exacerbated by climate change, such as fire risk, reduction of water resources and flooding. The Plan should make clear that housing delivery policy will not be met at the expense of such targets or sustainability policies, to ensure sustainable development is properly achieved across the Plan period.

Natural England welcome the use of a new settlement hierarchy for the emerging Local Plan to help emphasise accessibility by foot and bicycle. We recognise that clear focus is being placed in emerging policy to walk and cycle more frequently to access local destinations, while balancing the varying distances between services, facilities and homes in accomplishing this.

- Issue 2: Population and Housing

Natural England recognise the complications across the East Hampshire district due to it being split between two authorities: East Hampshire District Council and South Downs National Park Authority (SDNPA). It is a give that East Hampshire should continue to work collaboratively with SDNPA to best understand the housing needs and distributions coming forward in the district as a whole.

Recognition of the sensitivities of the SDNPA are described in more detail below, held in the Landscape section of Issue 4: Environment. In understanding how this can shape the housing numbers coming through the plan period, while working closely with the SDNPA, this could better the approach to housing development within the East Hampshire District Council authority and improve the value placed on the various landscapes incorporated. It is important that any new development plays a key role in shaping the way the district looks and feels, while conserving and enhancing our landscapes.

Natural England advocate the need to work collaboratively with neighbouring Local Planning Authorities in regard to shared issues and priorities, such as the Climate Emergency.

- Issue 4: Environment

#### *Biodiversity Net Gain*

Natural England strongly supports the requirement for development to deliver a 10% net gain in biodiversity. Net gain calculations can however be complex and open to a considerable degree of interpretation and wide margin of error that could potentially lead to biodiversity loss if not properly validated. Natural England therefore strongly advises that developers are required to agree their calculations with your Council through a suitably designed process or protocol.

The plan's approach to biodiversity net gain should be compliant with the mitigation hierarchy, as outlined in paragraph 175 of the NPPF. The policy should ensure that biodiversity net gain is not applied to irreplaceable habitats and should also make clear that any mitigation and/or compensation requirements for Habitats sites should be dealt with separately from biodiversity net gain provision.

Please see further detailed advice on biodiversity net gain at Annex A of this letter, including advice on evidence and monitoring.

#### *Protected sites – International*

East Hampshire contains several European protected sites of international importance within the district and in close proximity to it. These are addressed in much greater detail through the Habitats Regulation Assessment screening of the Issues and Priorities, October 2022. The European protected sites to be discussed, considered, and addressed within this Plan are as follows:

- Wealden Heaths Phase II SPA, Woolmer Forest SAC and Shortheath Common SAC (located in the north-east of East Hampshire District)
- East Hampshire Hangers SAC (stretching on a north-south axis through East Hampshire District)
- Butser Hill SAC (located in the southern part of East Hampshire District)
- Thursley, Hankley & Frensham Commons SPA and Thursley, Ash, Pirbright & Chobham SAC (located approx. 68m to the north-east of East Hampshire District in the adjoining authority of Waverley). These are otherwise referred to as the Wealden Heaths Phase I SPA
- Thames Basin Heaths SPA, overlapping with the most northern site of Thursley, Ash, Pirbright & Cobham SAC (located approx. 3.3km north-east of East Hampshire District in the adjoining authority of Hart)
- Chichester & Langstone Harbours SPA / Ramsar, Solent Maritime SAC and Portsmouth

Harbour SPA / Ramsar (located approx. 2.8km to the south of East Hampshire District in the adjoining authority of Havant)

- Thursley & Ockley Bogs Ramsar (located 5.1km to the north-east of the East Hampshire District boundary in the adjoining authority of Waverley)
- River Itchen SAC (3.8km to the west of the East Hampshire District boundary in the adjoining authority of Winchester)
- Rook Cliff SAC (located approx. 5.7km to the south-east of East Hampshire District in the adjoining authority of Chichester)
- Kingley Vale SAC (located approx. 5.8km to the south-east of East Hampshire District in the adjoining authority of Chichester)

Particular emphasis has been placed on what is referred to as the Wealden Heaths Phase II Special Protection Area (SPA) since these sites fall within the East Hampshire district and amongst large development sites such as Whitehill and Bordon. It is now widely recognised that additional housing development, particularly within 5km of the boundary of the SPA, has the potential to adversely affect its interest features, namely nightjar, woodlark and Dartford warbler, which are the three internationally rare bird species for which it is classified. The Wealden Heaths SPA has been notified for the same three international rare bird species as the Thames Basin Heaths SPA, and also Thursley, Hankley & Frensham Commons SPA which is otherwise known as the Wealden Heaths Phase I SPA. Planning authorities must therefore apply the requirements of regulation 61 of The Conservation of Habitats and Species Regulations 2017 (as amended), to housing development within 5km of the SPA boundary. The authority must decide whether a particular proposal, alone or in combination with other plans or projects, would be likely to have a significant effect on the SPA.

#### *Nutrient neutrality*

It is welcomed that the Council is working in collaboration with partner authorities including the Partnership for South Hampshire (PfSH) to work towards a definitive mitigation strategy to achieve nutrient neutrality. It would be advised to take an approach to seeking to allocate land through the local plan process to strategically address the impact of nutrients from new development on the River Itchen SAC and Solent marine designated sites, which are currently showing levels of eutrophication with consequential effects on protected species and habitats.

It is advised a nitrogen budget is calculated for the Local Plan and a strategy is devised for delivering nutrient neutral mitigation for all sites. Mitigation can come forward via several different options including on-site provision by larger development sites through green infrastructure/open space or by a local authority-led scheme for the smaller/windfall development or where any top-up is required from larger developments. Other wider strategic schemes approved by the local authority and Natural England may also be available and where these are relied upon it is advised that credits are secured/reserved to ensure that there is adequate supply available for the local plan growth.

Please note that the term 'nutrient' or 'nitrogen' should be used when discussing eutrophication of the marine Solent designated sites ('nitrates' specifically is a component of total nitrogen). When discussing eutrophication of riverine systems, 'phosphorus' should be the term used rather than 'phosphates'.

Please make clear use of [Natural England's latest guidance on achieving nutrient neutrality for new housing development](#) (March 2022). This guidance has been published alongside an updated nutrient calculator to help deliver homes that do not discharge excess nitrogen into the Solent's protected natural habitats.

#### *River Itchen – phosphorus*

With regards to eutrophication, phosphorus is currently a limiting factor within the River Itchen SAC. The local plan should seek to preserve water quality on the Itchen and ensure that local plan and windfall development within the district will not increase the phosphorus loading on the SAC from wastewater and surface run off.

## *Water resources*

The intention for stricter water use in the district is discussed broadly in Issue 4, recognising the international importance of the Solent European sites. The water resource problems in the region have implications for protected sites within the district, particularly the River Itchen Special Area of Conservation (SAC).

Natural England strongly recommend that all new development adopt a higher standard of water efficiency of 100 litres/per person/day, including external water use and re-use, in line with Southern Water's Target 100 demand reduction programme. Consideration should be given to the use of grey water recycling systems and efficient appliances.

### *River Itchen compensatory habitat*

It should be noted that following the Environment Agency changes to Southern Water abstraction licences to protect the River Itchen SAC, compensation packages have been agreed between the Environment Agency, Natural England and Southern Water as a result of the Test and Itchen Public Inquiry and the S20 agreement.

The River Meon is being considered as compensatory habitat for Atlantic Salmon, therefore it is advised that the local plan HRA considers the River Meon as a proposed SAC for Atlantic Salmon. This is also likely to have implications for the headwaters of the Meon. Further details on locations of this compensatory habitat could be provided with conversation with Natural England.

## *Landscape*

Natural England expects the Local Plan to include strategic policies to protect and enhance valued landscapes, as well criteria-based policies to guide development. It is welcomed that the Council has carried out further work to support their Landscape Capacity Study 2022, recognising the value of the designated landscapes across and adjacent to the district, such as the South Downs National Park (SDNP) and the Surrey Hills Area of Outstanding Natural Beauty (AONB) respectively.

It is well received that the emerging Plan will prioritise existing landscape features in decision making, ensuring any allocations will need to be designed and located sensitively to continue to protect and enhance these high-value and high-quality landscapes. The Plan and emerging Policy should be guided by NPPF paragraphs 170, 176 and 177, in protecting and enhancing valued landscapes; conserving the scenic beauty of AONB settings of which have the highest value; of which AONBs and National Parks are given the highest status of protection for their landscape and scenic beauty.

### *Green Infrastructure*

Green infrastructure refers to the living network of green spaces, water and other environmental features in both urban and rural areas. It is often used in an urban context to provide multiple benefits including space for recreation, access to nature, flood storage and urban cooling to support climate change mitigation, food production, wildlife habitats and health & well-being improvements provided by trees, rights of way, parks, gardens, road verges, allotments, cemeteries, woodlands, rivers and wetlands.

Green infrastructure is also relevant in a rural context, where it might additionally refer to the use of farmland, woodland, wetlands or other natural features to provide services such as flood protection, carbon storage or water purification.

We recommend the Plan outlines the need for securing the long-term management of new and existing green infrastructure (GI) and for protecting it from future development. Options could include the use of [conservation covenant agreements](#), [LNR declaration](#), [Fields in Trust](#) designation, green space designation in [neighbourhood plans](#) or [Town and Village Green](#) registration.

Alternatively, land can be passed on to a suitable NGO, or to your Council, or a Town or Parish Council.

A strategic approach for green infrastructure is required to ensure its protection and enhancement, as outlined in para 171 of the NPPF. Green Infrastructure should be incorporated into the plan as a strategic policy area, supported by appropriate detailed policies and proposals to ensure effective provision and delivery. We recognise and welcome the inclusion of green infrastructure as a specific policy in the previous local plan consultation (2019) as well as references in other cross-cutting policies, such as health and wellbeing, and support this approach going forward. We also support the inclusion of policies to protect existing trees, hedgerows and woodland, and to provide new trees and planting.

Since the previous Local Plan Reg 18 consultation (2019) Natural England has produced the [‘Introduction to the Green Infrastructure Framework Principles and Standards for England’](#) as part of the Government’s 25 Year Environment Plan to deliver more and better-quality green infrastructure (GI) to enhance towns and cities, and create attractive, healthy and investable places. The GI Framework will help local planning authorities meet requirements in the National Planning Policy Framework to consider GI in local plans and in new developments, and it can be utilised when updating local plans and formulating policy. The first two elements of the Framework are the ‘Why, What and How Principles of good Green Infrastructure’ and the Beta Green Infrastructure Mapping Tool providing a baseline of GI provision and inequality across England.

The launch of the full National Green Infrastructure Framework and Standards is taking place on 31st January 2023. The webinar is a free event with [tickets available here](#).

The full Framework includes recommended standards for the quality and quantity of multifunctional green infrastructure including the production of GI Strategies, access to natural green space standards and good design principles. The Framework also signposts to existing guidance and recognised methodologies for the provision of high-quality green infrastructure (such as [Green Flag](#) and Building with Nature) and useful tools as such the GI Policy Assessment Tool.

We recommend EHDC review the Framework and consider how the recommendations of the existing EHDC GI Strategy (May 2019), Biodiversity and Planning Guidance (June 2021), Climate and Environment Strategy (Aug 2020), Local Cycling and Walking Infrastructure Plan (Aug 2020), Place-Making Strategy (July 19), Open Space Assessment (Dec 18) and Strategic Flood Risk Assessment (May 2022) could all be supported by the inclusion of policies in the local plan on Urban Greening Factor, [Urban Tree Canopy Cover](#), Accessible Natural Greenspace Standards, quality of green space, and long term management, maintenance and monitoring of GI features. The Framework can also inform design guides/coding and support strong policy wording to integrate GI into cross cutting policies on infrastructure, environment, the climate emergency, health, housing provision and new development to help EHDC meet its overarching vision.

We would also recommend combining the opportunities and deficits identified in all these documents into one document/map to support and inform work on Biodiversity Net Gain, Local Nature Recovery Strategy, nutrient neutrality and Suitable Alternative Natural Greenspace (SANG) provision, and to support initiatives such as Green Social Prescribing, in conjunction with the neighbouring local authorities, Hampshire County Council and the Local Nature Partnership. This would assist in creating an overarching strategy to maximise all the multi-function benefits of nature and could identify opportunities for green financing.

#### *Call for Sites – ‘Green Sites’*

Natural England are happy to continue to work with East Hampshire District Council in their allocations or potential plans for bringing forward ‘green sites’ such as Suitable Alternative Natural Greenspace (SANG), Biodiversity Net Gain (BNG) and Nutrient Neutrality mitigation schemes. We welcome the opportunity to work with the Council on identifying and assessing possible green sites.

- Issue 5: Infrastructure

### *Air Quality*

It is Natural England's advice that poor air quality may have adverse impacts on protected sites. Further advice on air quality impacts on the nature environment can be found at Annex A of this letter below.

We would expect the plan to address the impacts of air quality on the natural environment. In particular, it should address the traffic impacts associated with new development, particularly where this impacts on Habitats sites and SSSIs. The environmental assessment of the plan (SA and HRA) should consider any detrimental impacts on the natural environment and suggest appropriate avoidance or mitigation measures where applicable.

The effects on local roads in the vicinity of any proposed development on nearby designated nature conservation sites (including increased traffic, construction of new roads, and upgrading of existing roads), and the impacts on vulnerable sites from air quality effects on the wider road network in the area (a greater distance away from the development) can be assessed using traffic projections and the 200m distance criterion followed by local Air Quality modelling where required. We consider that the designated sites at risk from local impacts are those within 200m of a road with increased traffic, which feature habitats that are vulnerable to nitrogen deposition/acidification. APIS provides a searchable database and information on pollutants and their impacts on habitats and species.

### *Open Space, Sport and Recreation*

Please refer to our advice above on green infrastructure provision. Please note that sports pitches and facilities should not be counted as green infrastructure.

Further general advice on consideration of protected species and other natural environment issues is provided at Annex A, including soils, access, air pollution and biodiversity net gain

We would be very happy to comment further as the plan process progresses. If you have any queries relating to this letter please contact me on [REDACTED]

Yours faithfully

[REDACTED]  
**Natural England**



## **Annex A - Natural England's standard advice**

### **Sites of Least Environmental Value**

In accordance with the paragraph 171 of NPPF, the plan should allocate land with the least environmental or amenity value. Natural England expects sufficient evidence to be provided, through the SA and HRA, to justify the site selection process and to ensure sites of least environmental value are selected, e.g., land allocations should avoid designated sites and landscapes and significant areas of best and most versatile agricultural land and should consider the direct and indirect effects of development, including on land outside designated boundaries and within the setting of protected landscapes.

### **Biodiversity and Geodiversity**

The Plan should set out a strategic approach, planning positively for the creation, protection, enhancement and management of networks of biodiversity. There should be consideration of geodiversity conservation in terms of any geological sites and features in the wider environment.

A strategic approach for networks of biodiversity should support a similar approach for green infrastructure (outlined below). Planning policies and decisions should contribute and enhance the natural and local environment, as outlined in para 170 of the NPPF. Plans should set out the approach to delivering net gains for biodiversity. Net gain for biodiversity should be considered for all aspects of the plan and development types, including transport proposals, housing and community infrastructure.

### **Priority habitats, ecological networks and priority and/or legally protected species populations**

The Local Plan should be underpinned by up-to-date environmental evidence. This should include an assessment of existing and potential components of local ecological networks. This assessment should inform the Sustainability Appraisal, ensure that land of least environment value is chosen for development, and that the mitigation hierarchy is followed and inform opportunities for enhancement as well as development requirements for particular sites.

Priority habitats and species are those listed under Section 41 of the Natural Environment and Rural Communities Act, 2006 and UK Biodiversity Action Plan (UK BAP). Further information is available here: [Habitats and species of principal importance in England](#). Local Biodiversity Action Plans (LBAPs) identify the local action needed to deliver UK targets for habitats and species. They also identify targets for other habitats and species of local importance and can provide a useful blueprint for biodiversity enhancement in any particular area.

Protected species are those species protected under domestic or European law. Further information can be found here [Standing advice for protected species](#). Sites containing watercourses, old buildings, significant hedgerows and substantial trees are possible habitats for protected species.

Ecological networks are coherent systems of natural habitats organised across whole landscapes so as to maintain ecological functions. A key principle is to maintain connectivity - to enable free movement and dispersal of wildlife e.g., badger routes, river corridors for the migration of fish and staging posts for migratory birds. Local ecological networks will form a key part of the wider Nature Recovery Network proposed in the 25 Year Environment Plan. Where development is proposed, opportunities should be explored to contribute to the enhancement of ecological networks.

Planning positively for ecological networks will also contribute towards a strategic approach for the creation, protection, enhancement and management of green infrastructure, as identified in paragraph 171 of the NPPF.

### **Access and Rights of Way**

Natural England advises that the Plan should include policies to ensure protection and enhancement of public rights of way and National Trails, as outlined in paragraph 98 of the NPPF. Recognition should be given to the value of rights of way and access to the natural environment in relation to health and wellbeing and links to the wider green infrastructure network. The plan should

seek to link existing rights of way where possible and provides for new access opportunities. The plan should avoid building on open space of public value as outlined in paragraph 97 of the NPPF. The plan should make provision for appropriate quantity and quality of green space to meet identified local needs as outlined in paragraph 96 of the NPPF.

## Soils

The Local Plan should give appropriate weight to the roles performed by the area's soils. These should be valued as a finite multi-functional resource which underpins our wellbeing and prosperity. Decisions about development should take full account of the impact on soils, their intrinsic character and the sustainability of the many ecosystem services they deliver for example:

1. Soil is a finite resource that fulfils many important functions and services (ecosystem services) for society; for instance as a growing medium for food, timber and other crops, as a store for carbon and water, as a reservoir of biodiversity and as a buffer against pollution. It is therefore important that the soil resources are protected and used sustainably. The [Natural Environment White Paper](#) (NEWP) 'The Natural Choice: securing the value of nature' (Defra, June 2011), emphasises the importance of natural resource protection, including the conservation and sustainable management of soils, for example:
  - A Vision for Nature: 'We must protect the essentials of life: our air, biodiversity, soils and water, so that they can continue to provide us with the services on which we rely' (paragraph 2.5).
  - Safeguarding our Soils: 'Soil is essential for achieving a range of important ecosystem services and functions, including food production, carbon storage and climate regulation, water filtration, flood management and support for biodiversity and wildlife' (paragraph 2.60).
  - 'Protect 'best and most versatile' agricultural land' (paragraph 2.35).
2. The conservation and sustainable management of soils also is reflected in the [National Planning Policy Framework](#) (NPPF), particularly in paragraphs 170 and 171. When planning authorities are considering land use change, the permanency of the impact on soils is an important consideration. Particular care over planned changes to the most potentially productive soil is needed, for the ecosystem services it supports including its role in agriculture and food production. Plan policies should therefore take account of the impact on land and soil resources and the wide range of vital functions (ecosystem services) they provide in line with paragraph 118 of the NPPF, for example to:
  - Safeguard the long-term capability of best and most versatile agricultural land (Grades 1, 2 and 3a in the Agricultural Land Classification) as a resource for the future.
  - To avoid development that would disturb or damage other soils of high environmental value (e.g., wetland and other specific soils contributing to ecological connectivity, carbon stores such as peatlands etc) and, where development is proposed.
  - Ensure soil resources are conserved and managed in a sustainable way.
3. To assist in understanding agricultural land quality within the plan area and to safeguard 'best and most versatile' agricultural land in line with paragraphs 170 and 171 of the National Planning Policy Framework, strategic scale Agricultural Land Classification (ALC) Maps are available. Natural England also has an archive of more detailed ALC surveys for selected locations. Both these types of data can be supplied digitally free of charge by contacting Natural England. Some of this data is also available on the [www.magic.gov.uk](http://www.magic.gov.uk) website. The planning authority should ensure that sufficient site specific ALC survey data is available to inform decision making. For example, where no reliable information was available, it would be reasonable to expect that developers should commission a new ALC survey, for any sites they wished to put forward for consideration in the Local Plan.
4. General mapped information on soil types is available as 'Soilscapes' on the [www.magic.gov.uk](http://www.magic.gov.uk) and also from the LandIS website <http://www.landis.org.uk/index.cfm> which contains more information about obtaining soil data.

5. Further guidance for protecting soils (irrespective of their ALC grading) both during and following development is available in Defra's [Construction Code of Practice for the Sustainable Use of Soils on Construction Sites](#), to assist the construction sector in the better protection of the soil resources with which they work, and in doing so minimise the risk of environmental harm such as excessive run-off and flooding. The aim is to achieve positive outcomes such as cost savings, successful landscaping and enhanced amenity whilst maintaining a healthy natural environment, and we would advise that the Code be referred to where relevant in the development plan.

### **Air pollution**

We would expect the plan to address the impacts of air quality on the natural environment. In particular, it should address the traffic impacts associated with new development, particularly where this impacts on European sites and SSSIs. The environmental assessment of the plan (SA and HRA) should also consider any detrimental impacts on the natural environment and suggest appropriate avoidance or mitigation measures where applicable.

Natural England advises that one of the main issues which should be considered in the plan and the SA/HRA are proposals which are likely to generate additional nitrogen emissions as a result of increased traffic generation, which can be damaging to the natural environment.

The effects on local roads in the vicinity of any proposed development on nearby designated nature conservation sites (including increased traffic, construction of new roads, and upgrading of existing roads), and the impacts on vulnerable sites from air quality effects on the wider road network in the area (a greater distance away from the development) can be assessed using traffic projections and the 200m distance criterion followed by local Air Quality modelling where required. We consider that the designated sites at risk from local impacts are those within 200m of a road with increased traffic, which feature habitats that are vulnerable to nitrogen deposition/acidification. APIS provides a searchable database and information on pollutants and their impacts on habitats and species: <http://www.apis.ac.uk/>

It is advised that [Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations](#) is followed when assessing impacts on protected sites.

### **Biodiversity Net Gain**

#### *Embedding biodiversity net gain*

It is highly recommended that the Local Plan Update incorporates a policy for biodiversity net gain. Biodiversity net gain is a key tool to help nature's recovery and is also fundamental to health and wellbeing as well as creating attractive and sustainable places to live and work in. The NPPF highlights the role of 'policies and decision making to minimise impacts and provide net gains for biodiversity' (para 170).

Planning Practice Guidance describes net gain as an 'approach to development that leaves the natural environment in a measurably better state than it was beforehand' and applies to both biodiversity net gain and wider environmental net gains. For biodiversity net gain, Natural England's [Biodiversity Metric 3.1](#), can be used to measure gains and losses to biodiversity resulting from development. We advise you to use this metric to implement development plan policies on biodiversity net gain. Any action, as a result of development, that creates or enhances habitat features can be measured using the metric and as a result count towards biodiversity net gain.

The Chartered Institute of Ecology and Environmental Management, along with partners, has developed '[good practice principles](#)' for biodiversity net gain, which can assist plan-making authorities in gathering evidence and developing policy.

#### *Wider environmental gains*

Natural England focusses our advice on embedding biodiversity net gain in development plans, since the approach is better developed than for wider environmental gains. However, your authority should consider the requirements of the NPPF (paragraph 72, 102, 118 and 170) and seek opportunities for wider environmental net gain wherever possible. This can be achieved by considering how policies and proposed allocations can contribute to wider environment enhancement, help adapt to the impacts of climate change and/or take forward elements of existing green infrastructure, open space or biodiversity strategies. Opportunities for environmental gains, including nature-based solutions to help adapt to climate change, might include:

- Identifying opportunities for new multi-functional green and blue infrastructure.
- Managing existing and new public spaces to be more wildlife friendly (e.g., by sowing wild flower strips, changing cutting regime of open spaces and road verges\*) and climate resilient
- Planting trees, including street trees, characteristic to the local area to make a positive contribution to the local landscape.
- Improving access and links to existing greenspace, identifying improvements to the existing public right of way network or extending the network to create missing footpath or cycleway links.
- Restoring neglected environmental features (e.g., a hedgerow or stone wall or clearing away an eyesore).
- Designing a scheme to encourage wildlife, for example by ensuring lighting does not pollute areas of open space or existing habitats

\*Please see this [paper](#) regarding cost-effective and low-maintenance management for species-rich grassland on road verges and the value it can contribute to biodiversity and ecosystem services

Any habitat creation and/or enhancement as a result of the above may also deliver a measurable biodiversity net gain.

### Evidence gathering

Existing environmental evidence can be gathered from various sources including online data sources like [MAGIC](#), the [Hampshire Biodiversity Information Centre](#) (HBIC), and strategies for green infrastructure, open space provision, landscape character, climate and ecosystem services and biodiversity opportunity mapping. We advise that reference is made to the **Hampshire Ecological Network Mapping** dataset – this comprises the Local Ecological Network mapping for Hampshire, prepared by HBIC. The network comprises statutory designations, non-statutory designated sites, ancient woodlands, and other non-designated priority habitat, and other ecological features such as undesignated water bodies. Usefully, the Hampshire network mapping also identifies areas where there is the greatest potential to enhance the network, referred to as the network opportunities layer, based on habitat suitability indices. This can be useful where deciding where to create or enhance habitat.

Biodiversity data can also be obtained from developments that were subject to Environmental Impact Assessment (EIA) Monitoring, the discharge of conditions or monitoring information from legal agreements with a biodiversity element. This can help establish a baseline to understand what assets exist and how they may relate to wider objectives in the plan area. Cross boundary environmental opportunities can also be considered by working with neighbouring authorities, local nature partnership and/or the local enterprise partnership. The relationship between environmental assets and key strategic growth areas may help to highlight potential opportunities that development could bring for the natural environment. The following may also be useful when considering biodiversity priorities in your plan area:

- What biodiversity currently exists, what is vulnerable or declining?
- How are existing assets connected, are there opportunities to fill gaps and improve connectivity?
- How does the above relate to neighbouring authority areas, can you work collaboratively to improve links between assets or take strategic approaches to address issues or opportunities?

## Applying the mitigation hierarchy

The plan's approach to biodiversity net gain should be compliant with the mitigation hierarchy, as outlined in paragraph 175 of the NPPF. The policy should ensure that biodiversity net gain is not applied to irreplaceable habitats and should also make clear that any mitigation and/or compensation requirements for European sites should be dealt with **separately** from biodiversity net gain provision.

Policies and decisions should first consider options to avoid adverse impacts on biodiversity from occurring. When avoidance is not possible impacts should be mitigated and finally, if there is no alternative, compensation provided for any remaining impacts. Biodiversity net gain should be additional to any habitat creation required to mitigate or compensate for impacts. It is also important to note that net gains can be delivered even if there are no losses through development.

The policy for net gain, or its supporting text, should highlight how losses and gains will be measured. The [Biodiversity Metric 3.1](#) can be used for this purpose as a fully tested metric that will ensure consistency across the plan-area, and we would encourage its use. Alternatively, your authority may choose to develop a bespoke metric, provided this is evidenced based.

The following may also be useful considerations in developing plan policies:

- Use of a map within the plan. Mapping biodiversity assets and opportunity areas ensures compliance with national planning policy and also helps to clearly demonstrate the relationship between development sites and opportunities for biodiversity net gain.
- ***NB: The Hampshire Ecological Network Mapping dataset would be ideally placed to provide this evidence base.***
- Use of a biodiversity net gain target. Any target should be achievable, and evidence based and may be best placed in lower tier documents or a Supplementary Planning Document, to allow for regular updates in line with policy and legislation.
- Consideration should be given to thresholds for different development types, locations or scales of development proposals and the justification for this. Setting out the scope and scale of expected biodiversity net gains within Infrastructure Delivery Plans can help net gain to be factored into viability appraisals and land values. Natural England considers that all development, even small-scale proposals, can make a contribution to biodiversity. Your authority may wish to refer to Technical Note 2 of the CIEEM guide which provide useful advice on how to incorporate biodiversity net gain into small scale developments.
- Policy should set out how biodiversity net gain will be delivered and managed and the priorities for habitat creation or enhancement in different parts of the plan area. The plan policy should set out the approach to onsite and offsite delivery. Natural England advises that on-site provision should be preferred as it helps to provide gains close to where a loss may have taken place. Off-site contributions may, however, be required due to limitations on-site or where this best meets wider biodiversity objectives set in the development plan. Further detail could be set out in a supplementary planning document.
- The policy could also usefully link to any complementary strategies or objectives in the plan, such as green infrastructure.

## Monitoring

Your plan should include requirements to monitor biodiversity net gain. This should include indicators to demonstrate the amount and type of gain provided through development. The indicators should be as specific as possible to help build an evidence base to take forward for future reviews of the plan, for example the total number and type of biodiversity units created, the number of developments achieving biodiversity net gains and a record of on-site and off-site contributions.

LPA's should work with local partners, including the Local Environmental Record Centre and wildlife trusts, to share data and consider requirements for long term habitat monitoring. Monitoring

requirements should be clear on what is expected from landowners who may be delivering biodiversity net gains on behalf of developers. This will be particularly important for strategic housing allocations and providing as much up-front information on monitoring will help to streamline the project stage.

### **Climate change resources**

Please see below links to further resources that may be useful in developing local policy to address climate change within the local authority area.

- The [Climate Change Adaptation Manual](#) - provides extensive information on climate change adaptation for the natural environment. It considers the potential impacts of climate change on individual priority habitats and outlines possible adaptation responses. It includes the Landscape Scale Adaptation Assessment Method to assist those wanting to undertake a climate change vulnerability assessment for an area larger than an individual site or specific environmental feature, focussing on identifying vulnerabilities to climate change.
- The [National Biodiversity Climate Change Vulnerability Model](#) is a mapping tool that helps identify areas likely to be more vulnerable to the impacts of climate change.
- [Carbon Storage and Sequestration by Habitat 2021 \(NERR094\)](#) – a recently updated report that reviews and summarises the carbon storage and sequestration rates of different semi-natural habitats that can inform the design of nature-based solutions to achieve climate mitigation and adaptation.
- The [Nature Networks Evidence Handbook](#) – aims to help the designers of nature networks by identifying the principles of network design and describing the evidence that underpins the desirable features of nature networks. It builds on the Making Space for Nature report of Lawton et al. 2010), outlining some of the practical aspects of implementing a nature network plan, as well as describing the tools that are available to help in decision making.
- [Natural England Climate Change webinars](#) - a range of introductory climate change webinars available on YouTube.

# Emerging Local Plan – Issues & Options Consultation - Network Rail Comments

[Redacted]

Thu 01/12/2022 11:01

To: EHDC - Local Plan <LocalPlan@easthants.gov.uk>

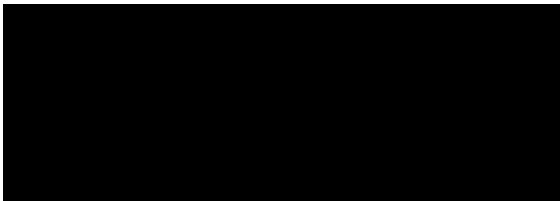
Cc: [Redacted]



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**By Email only** localplan@easthants.gov.uk



01 December 2022

East Hampshire District Council

## PLANNING POLICY CONSULTATION

### Emerging Local Plan – Issues & Options Consultation

Thank you for giving Network Rail the opportunity to comment on the above consultation.

Network Rail require additional time to review it in full and will submit any detailed comments, if required, as soon as possible. If it is too late to comment or there is a long-stop date, please do let us know. In the meantime, we set about below some initial comments.

It is important that plans and policies reflect the aspirations of Network Rail and the wider rail industry as far as they are known at this stage and provides suitable flexibility to support future growth of the railway for both passenger and freight services. The railway network is a vital element of the country's economy and a key component in the drive to deliver the Government's sustainable agenda.

The impact of new development on railway infrastructure such as railway stations and level crossing should be fully assessed. To ensure that Network Rail can continue to deliver a safe and efficient railway, Network Rail would expect financial contributions towards new or enhanced railway infrastructure to mitigate the impact of growth in the area. This could include funding towards

improvement at stations such as cycle parking, improved customer information screens, new waiting shelters, lighting, platform extensions, new station entrances etc., and works such as new footbridges to enable level crossings to be closed. As part of Network Rail’s license to operate and manage Britain’s railway infrastructure, Network Rail have the legal duty to protect rail passengers, the public, the railway workforce, and to reduce risk at our level crossings so far as is reasonably practicable.

New development can also have others impact on the railway. It is important that the risk to the railway from landslips and flooding are considered for safety and operational reasons, as well fencing, planting along the railway boundary, excavations etc. Please find attached some guidance from Network Rail’s Asset Protection team.

If you have any questions on the above, please do get in touch with us.

Yours Sincerely,



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## East Hampshire District Council Local Plan Consultation – Network Rail Wessex Strategic Planning Response

Network Rail welcomes East Hampshire's encouragement of residents utilising sustainable means of transport including but not limited to rail in line with the council's sustainability proposals. We hope to work closely with the council, train operators, bus operators and more to accelerate the use of public transport to and from our stations as part of our goals on first last mile principles.

Greater rail patronage and an increased usage of our stations within East Hampshire's boundaries will allow us to consider what options could potentially be taken forward with regards to station improvements in order to accommodate for additional demand. Appendix A of the East Hampshire District Council 'Infrastructure Paper' contains a selection of improvement projects that have been identified as priorities at each station. Network Rail would look forward to engaging with East Hampshire and South Western Railway on how we could implement these improvements and ensure we are effectively meeting any future levels of station usage to provide a functioning railway for residents.

It is increasingly vital to recognise the need for residents to access employment opportunities within the district council through greater connectivity. This is a key area of concern for Network Rail and something we will look to improve upon within the council in order to meet the expected baseline of 2,700 jobs over the period from 2021-38 as part of economic growth anticipated in the district. Again, predicted economic growth will not only impact current residents, but will also likely draw new residents into the area and because of this it is vital that we capitalise on ensuring new residents are provided an efficient and reliable sustainable transport network. Network Rail are not only motivated by economic growth in their pursuit of greater connectivity, however. It is also in the interest of connecting residents from different areas for purposes of leisure and social in addition to work.

With large areas of the South Downs not falling under the planning authority of East Hampshire district council, Network Rail looks forward to ensuring cross-boundary collaboration in ensuring the needs of the wider area are met through regular stakeholder engagement. This will mean that goals such as greater connectivity are not only met but exceeded. Additionally, Network Rail is supportive of the ideas suggested in the infrastructure section of '20-minute neighbourhoods' and reducing private vehicle usage and providing sustainable alternatives where possible and the commitment to prioritising developments in areas where these transport options are most accessible, promotion first mile last mile and improved transport integration.

## **East Hampshire District Council Briefing Note**

### 1 - Railways Today

The railway, like most industries, has experienced a tumultuous few years enduring the impact of the coronavirus pandemic. Fuelled by government-mandated lockdowns and widespread fear of public transport and the perceived increase in covid transmission in these settings, ridership plummeted to as low as 4% during the initial lockdown. The rail industry has had to work tirelessly to overcome this perception and bring back passengers to the levels seen pre-pandemic. As of today, levels of ridership on UK trains have peaked at around 90% of pre-covid levels, out-performing it's European counterparts (approximately 75%) proving that so far, the campaign to bring back rail has been largely successful. The returning travel has comprised of significantly more leisure travel, with commuter travel slowly on the increase too as employees return to the office in an albeit reduced frequency.

Another significant development to the railways occurred during the "pandemic years". This was the release of the Williams-Shapps Plan for Rail setting out its proposals for reform and restructuring of the British rail industry. Outcomes of the report include the formation of "Great British Railways" or "GBR". GBR will absorb Network Rail and work to amalgamate many of the railways existing functions, from owning the infrastructure, receiving fare revenue and running and planning the network, setting fares and timetables. The report and subsequent overhaul look to address concerns the current system is not fit-for-purpose by embracing closer collaboration between moving parts, increasing efficiency, and bringing better value for money for customers and taxpayers.

At a route level, the focus for the railways has shifted. Within Wessex, it is no longer so much about ferrying masses of commuters into London from various hubs across the route, but more about looking at how connectivity within the area can be achieved. This strategy hopes to address the desire for greater availability of sustainable, reliable transport between localities within Wessex, capitalising on lower demand for services into Waterloo and increased leisure travel.

A key theme for Network Rail and the Government as a whole is that of decarbonisation and greener, more sustainable travel. Decarbonisation aims to create a net-zero rail network by 2050 by introducing a number of plans look to reduce the railways impact on the planet. To achieve this ambitious target, the rail industry hopes to remove all diesel-only trains from the network by 2040, deliver cost-efficient electrification programmes, fund and develop new environmentally responsible technology and work to improve accessibility to the railway as a means of sustainable travel.

## 2 - East Hampshire's Railway Provision

The district council of East Hampshire features the stations of Alton, Bentley, Liss, Liphook and Rowlands Castle. The council's busiest station is Petersfield. After Petersfield it is then Alton, narrowly followed by Liphook with Liss at half that number and Bentley and Rowlands Castle hovering around 130,000 entries and exits.

The effects of coronavirus on the railway saw dramatic decreases in entries and exits throughout stations in East Hampshire district council. Alton and Bentley in particular suffered heavily seeing reductions in entries and exits in excess of 80-84%. Liss and Liphook experienced the smallest reductions, however these too were still significant, measuring 55 and 55.2% respectively.

Station	Entries and Exits (2019/20)	Entries and Exits (2020/21)	% Decrease in Entries and Exits
Alton	679,324	133,396	80.3%
Bentley	132,018	20,640	84.3%
Liss	328,618	147,816	55%
Liphook	633,798	283,436	55.2%
Rowlands Castle	123,718	47,426	61.7%
Petersfield	1,405,648	371,200	73.6%

Figure 1: Table to show entries and exits of East Hampshire district council stations

Two lines operate within the boundaries of East Hampshire district council. The Alton branch of the South West Main line includes the stations of Alton and Bentley and is operated by South Western Railway. The Alton line is electrified with 750V AC third rail and provides two trains per hour to London Waterloo. The Portsmouth Direct comprises of Liss, Liphook, Rowlands Castle and Petersfield. A variety of stopping and fast services operate up the Portsmouth Direct main line and into London Waterloo, the table below demonstrates how each station is served along this route.

Station	Hourly services to London Waterloo (Peak)	Hourly services to London Waterloo (Off-peak)
Alton	2	2
Bentley	2	2
Liss	2	1
Liphook	2	1
Rowlands Castle	1	1
Petersfield	4	2

Figure 2: Table to show peak and off-peak services to London Waterloo

Services within the county show mixed levels of connectivity. The table below displays the fastest journey times between stations excluding waiting times. In some cases, journey times are fast and require no changes, however in other cases journeys can take as much as 76 minutes of travel time, and this is without considering waiting times or possible delays.

Direct service = GREEN Change required = ORANGE						
	Alton	Bentley	Liss	Liphook	Rowlands Castle	Petersfield
Alton		6 mins	76 mins	69 mins	77 mins	73 mins
Bentley	6 mins		69 mins	62 mins	70 mins	68 mins
Liss	76 mins	69 mins		7 mins	15 mins	5 mins
Liphook	69 mins	62 mins	7 mins		21 mins	11 mins

<b>Rowlands Castle</b>	77 mins	70 mins	15 mins	21 mins		10 mins
<b>Petersfield</b>	73 mins	68 mins	5 mins	11 mins	10 mins	

Figure 3: Table to show journey times (excl. waiting) between stations within East Hampshire district council

From	To	Journey Time (Train)	Journey Time (Car)	Cost (Train)	Cost (Car)
<b>Alton</b>	<b>Bentley</b>	6 mins	12 mins	£4.00	£1.28
<b>Alton</b>	<b>Liss</b>	76 mins	23 mins	£20.30	£2.13
<b>Alton</b>	<b>Liphook</b>	69 mins	24 mins	£10.00	£2.47
<b>Alton</b>	<b>Rowlands Castle</b>	77 mins	36 mins	£8.30	£5.03
<b>Alton</b>	<b>Petersfield</b>	73 mins	25 mins	£20.30	£3.07
<b>TOTAL</b>		<b>301 mins</b>	<b>120 mins</b>	<b>£62.90</b>	<b>£13.98</b>

Table 1: Comparing train journey time vs car journey time, and train cost (cheapest single fare) vs fuel cost (40mpg at 188p per litre unleaded) of Alton to various destinations within East Hampshire

The above table shows just how difficult both financially and efficiency-wise it can be to travel by train within the East Hampshire area, especially when having to make changes to reach a destination. Travelling by car for these journeys is 78% cheaper and 60% faster in total representing a significant advantage for personal vehicle usage and a large roadblock to be overcome in pursuit of higher uptakes of green travel methods. Currently, none of the journeys are cheaper by train and only one is quicker (Alton to Bentley). The data shows that significant work is still to be done to make rail a considerably more attractive option for residents travelling within the area.

From	To	Journey Time (Train)	Journey Time (Car)	Cost (Train)	Cost (Car)
<b>Rowlands Castle</b>	<b>Alton</b>	77 mins	36 mins	£8.30	£5.03
<b>Rowlands Castle</b>	<b>Bentley</b>	70 mins	39 mins	£8.30	£5.47
<b>Rowlands Castle</b>	<b>Liss</b>	15 mins	22 mins	£7.00	£3.08
<b>Rowlands Castle</b>	<b>Liphook</b>	21 mins	29 mins	£6.00	£4.27
<b>Rowlands Castle</b>	<b>Petersfield</b>	10 mins	18 mins	£4.00	£2.31
<b>TOTAL</b>		<b>193 mins</b>	<b>144 mins</b>	<b>£33.60</b>	<b>£20.16</b>

Table 2: Comparing train journey time vs car journey time, and train cost (cheapest single fare) vs fuel cost (40mpg at 188p per litre unleaded) of Rowlands Castle to various destinations within East Hampshire

When undergoing the same cost/journey-time analysis from Rowlands Castle, a Portsmouth Direct line station, the competitiveness of rail is much greater. Travel by car from Rowlands Castle to destinations within East Hampshire is 40% cheaper and 25% faster than train. This is significantly lower than the 78% cheaper and 60% faster figures for car use versus train use from Alton. This data proves connectivity within East Hampshire using rail is somewhat feasible in comparison to personal vehicle use, however, it is largely dependent on the origin and destination to determine to what extent you are paying more money and (in most cases) spending more time travelling. The data also demonstrates how much more expensive and time consuming it is to travel around East Hampshire if your origin station is Alton compared to Rowlands Castle. Alton station users will spend almost double (1.87x) on train tickets and 24 extra minutes in journey time travelling to the stations of East Hampshire District Council.

Freight within East Hampshire is minimal with no services running on the Portsmouth direct line. Freight trains previously ran on the Alton Line serving Holybourne Oil Terminal transporting oil to

the Fawley refinery. Currently Network Rail are in conversation with the site owners about the possible return of freight to this line.

### 3 - East Hampshire Stations

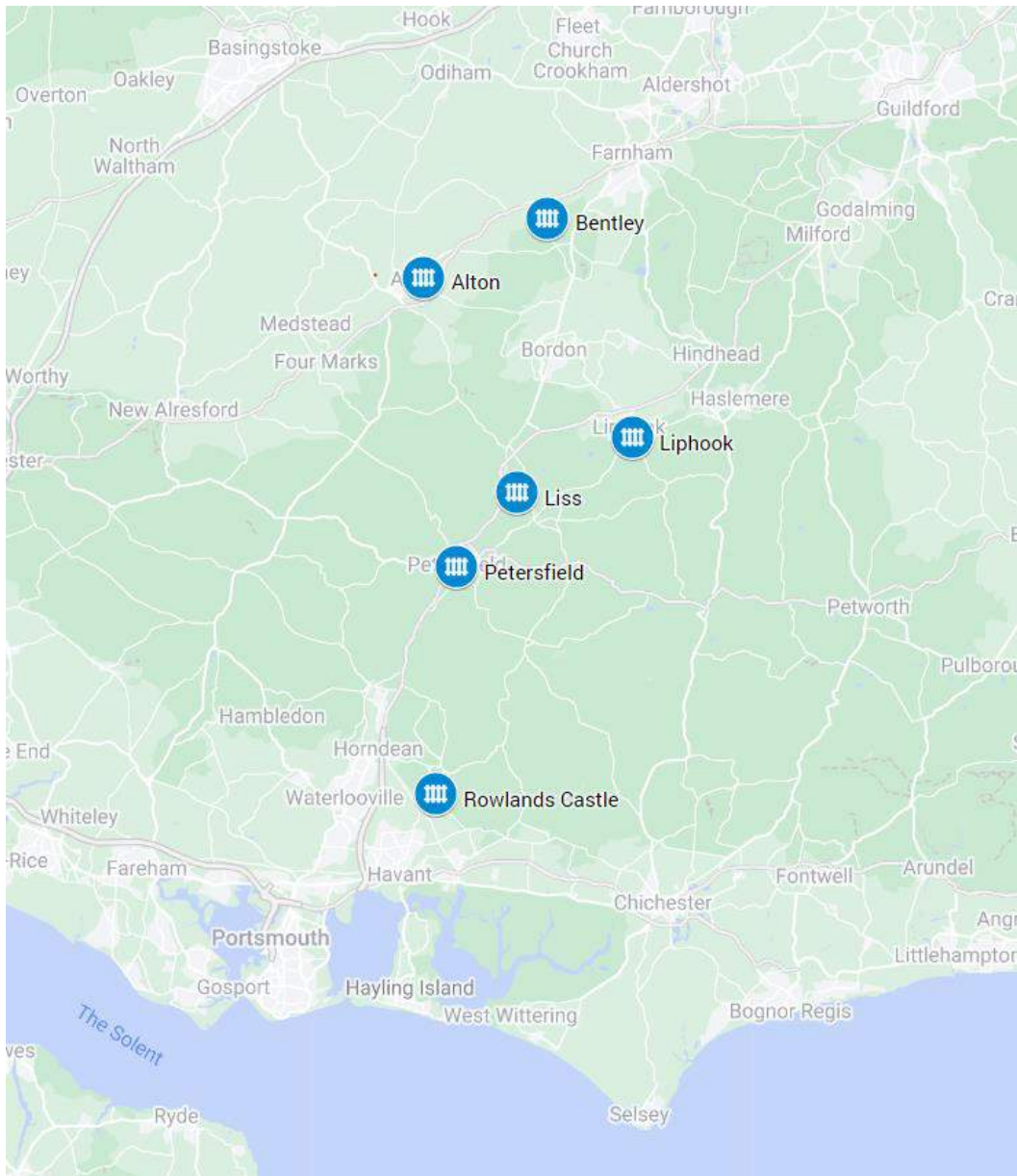


Figure 4: Map to show locations of stations within East Hampshire District Council

East Hampshire District Council contains six railway stations within its borders, all managed by South Western Railways, a key train operating company on the Wessex route. The stations saw a combined 3.3m entries and exits in 2019-20 demonstrating the value and custom that East Hampshire brings to the rail industry.

Station	Accessibility	Facilities	Integration	Parking	Cycle storage
<b>Alton</b>	<ul style="list-style-type: none"> <li>• Whole station</li> <li>• Level access to Platform 1</li> <li>• Lift access to Platform 2</li> <li>• Accessible toilets</li> </ul>	<ul style="list-style-type: none"> <li>• Hospitality</li> <li>• Seating</li> <li>• Toilets</li> </ul>	<ul style="list-style-type: none"> <li>• Bus connectivity from station</li> </ul>	185 spaces	60 spaces
<b>Bentley</b>	<ul style="list-style-type: none"> <li>• Steep ramp to Platform1 and 2</li> </ul>	<ul style="list-style-type: none"> <li>• Seating</li> <li>• Toilets</li> </ul>	<ul style="list-style-type: none"> <li>• Bus connectivity from station</li> </ul>	85 spaces	23 spaces
<b>Liss</b>	<ul style="list-style-type: none"> <li>• Ramp to Platform1</li> <li>• Ramp or side gate to Platform2</li> <li>• Transfers between platforms either via station footbridge or full-barrier level crossing</li> </ul>	<ul style="list-style-type: none"> <li>• Toilets</li> </ul>	<ul style="list-style-type: none"> <li>• Bus connectivity from station</li> </ul>	40 spaces	22 spaces
<b>Liphook</b>	<ul style="list-style-type: none"> <li>• Whole station</li> <li>• Level access to Platform 1</li> <li>• Footbridge with lifts to Platform 2</li> </ul>	<ul style="list-style-type: none"> <li>• Toilets</li> </ul>	<ul style="list-style-type: none"> <li>• Bus connectivity from station</li> </ul>	74 spaces	67 spaces
<b>Rowlands Castle</b>	<ul style="list-style-type: none"> <li>• No part of station</li> </ul>		<ul style="list-style-type: none"> <li>• Bus connectivity from station</li> </ul>	26 spaces	4 spaces
<b>Petersfield</b>	<ul style="list-style-type: none"> <li>• Whole station</li> <li>• Level access to London end of both platforms</li> </ul>	<ul style="list-style-type: none"> <li>• Toilets</li> <li>• Seating</li> <li>• Shops</li> <li>• Hospitality</li> </ul>	<ul style="list-style-type: none"> <li>• Bus connectivity from station</li> </ul>	154 spaces	172 spaces

Figure 5: Table providing key summary information on East Hampshire district council stations

Accessibility at the stations is generally well supported across the district. Notably, Rowlands Castle features relatively poor accessibility however, with no part of the station suitable for those requiring assistance. Just two of the six stations feature hospitality (cafes and restaurants in the station) and just one of the six (Petersfield) has any retail options for passengers. A level of bus connectivity is available at all stations with aspirations for more services to connect nearby towns and villages running from each of East Hampshire's rail stations and services.

Station	Entries & Exits (E&E)	Car Spaces	Cycle Spaces
Alton	679,000.00	185	60
Bentley	132,000.00	85	23
Liss	328,000.00	40	22
Liphook	633,000.00	74	67
Rowlands Castle	123,000.00	26	4
Petersfield	1,400,000.00	154	172

Figure 6: Entries and Exits per car and cycle space at East Hampshire district council stations

The above table provides a high-level analysis of entries and exits per car and cycle space at each station. This gives us an idea of how over or undersubscribed each station is with regards to facilities for those accessing the station by car or bicycle. The data shows that Petersfield ranks highest for number of entries and exits per car space (9,090) and Rowlands Castle highest for cycle space (30,750 entries and exits per cycle space), more than double the next highest-ranking station. It may be worth noting that these stations are comparatively oversubscribed and may warrant further investigation for parking and cycle space capacity improvements. It is, however, important to remember that this is only a high-level analysis and other factors may skew the data. A station with higher traffic via walking will not need the extra parking but will reveal a higher entry and exit number per car space and so this must be considered when undergoing further investigation.

East Hampshire is home to the 'East Hampshire Community Rail Partnership (CRP)'. CRPs are local organisations aimed at bringing together local groups and stakeholders along railway lines to work with industry, providing a number of community engagement and promotional activities. Initiatives range from people helping to maintain station gardens to major refurbishment schemes. East Hampshire Community Rail partnership, specifically, aims to:

- Promote the train services at Liphook, Liss, Petersfield and Rowlands Castle stations.
- Encourage use of the train services and stations as access gateways to the South Downs National Park.
- Encourage partners such as local businesses, community organisations, and volunteers to become more involved with the stations and services.
- Enable the rail industry to work with local tourist attractions and the South Downs National Park to attract more visitors to access the area by train.
- Provide a means to enhancing the environment and facilities at each station.

#### 4 - Current Railway Projects

Current schemes ongoing within the East Hampshire district council area include the forecourt refurbishments taking place at Alton station, a key gateway to the South Downs National Park. The alterations will look to enhance passenger access to the station entrance and improve integration with connecting transport to the station. The scope of work taking place includes a reconfiguration of pedestrian cycle and vehicle access and egress at the station, a reconfiguration of taxi bays and bus stops in addition to the installation of a new bus stop. The car parking bays will also be modified to improve layout and pedestrian access routes. The access steps leading from the forecourt to the highway have also been earmarked for safety improvements as part of the works.

Another scheme ongoing within the boundaries of East Hampshire District Council is the Farncombe to Petersfield re-signalling project taking place between 2022 and 2024 on the Portsmouth Direct

line. Prior to the pandemic 40,000 passengers used the line every day making it one of the busiest commuter routes in the country. The project looks to install a new digital signalling system controlled from Network Rail's Rail Operating Centre in Basingstoke. In addition to this there will be a selection of new and improved switches and crossings at Petersfield and Haslemere which will increase the speed at which trains can travel on the line and create a more reliable railway for passengers. Twelve level crossings will also be upgraded making them safer for both drivers and passengers as part of the scheme.

Plans are also in place to close two high-risk footpath level crossings (Alice Holt and Buckshorn Oak Level Crossing) at Bentley station following a fatality. The scheme proposes a new station footbridge with steps and a lift to provide disabled access. Timelines for scheme completion include the footbridge opening in April 2023 and finish of site in April/May 2023.

## 5 - Future strategy

Wessex strategic planning investigated a number of potential means by which the variety of constraints faced on Wessex route, and specifically East Hampshire, could be mitigated, the results of these studies produced a number of possible outputs that could be utilised. The below map shows the expected crowding on trains into Waterloo in the high peak hour (08:00 to 08:59). This is an averaged across all the services in the high peak time period so some specific trains may be more crowded than the map suggests, whilst others may be more lightly crowded. What this shows is that there is some crowding expected on the Portsmouth Direct Line (the purple line) and the dark green as far as Guildford which may hide that there is more overcrowding when you look at specific trains.

This led us to decide on a service specification that:

- Reinststate the Haslemere service that was taken out of the timetable owing to Covid/ changing travel patterns (commuting less)
- A new Haslemere service
- A new Havant service

This will provide capacity for the period to 2050.



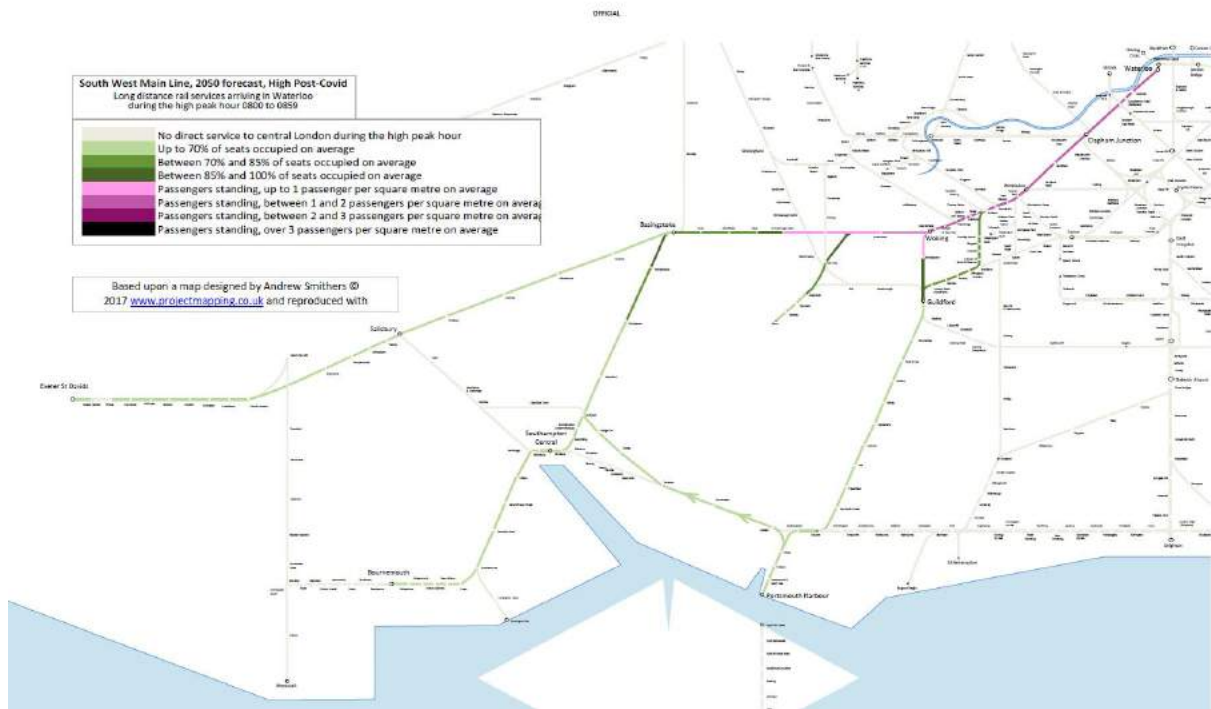


Figure 7: Expected levels of crowding into London Waterloo station

A centre turnback at Haslemere is part of future rail strategy in East Hampshire allowing for the quicker movement of trains in different directions without compromising on capacity. The plan will see Haslemere utilise platform two more regularly as a centre turnback and increase line speeds into platform one for through-trains, potentially reducing journey times. Another proposal targeting improved journey times is additional track capacity between Liphook and Petersfield via an additional loop to allow a fast, non-stopping service to operate.

## 6 - Opportunities for station enhancements

Station Travel Plans devised by South Western Railway have identified a catalogue of potential improvements and developments that could be made at stations within East Hampshire, the table below summarises the list of possible projects that could take place to enhance the stations from access to transport integration.

Station	Improvement
Liss	<ul style="list-style-type: none"> <li>• Improve station access for pedestrians especially those with reduced mobility                             <ul style="list-style-type: none"> <li>• Tactile dropped kerbs on all arms of approach</li> <li>• Improved footpaths around station and car park</li> </ul> </li> <li>• Improve wayfinding                             <ul style="list-style-type: none"> <li>• Improved station signage</li> </ul> </li> <li>• Improve cycle access                             <ul style="list-style-type: none"> <li>• Promote LCWIP aspirations</li> <li>• Cycle signage</li> <li>• Promote use of cycling facilities</li> </ul> </li> </ul>

	<ul style="list-style-type: none"> <li>• Improve car access and reduce impact of level crossing <ul style="list-style-type: none"> <li>• New seating of forecourt side of level crossing</li> <li>• Improved traffic management</li> <li>• Addition traffic signs</li> <li>• Kiss and ride facility on platform 1</li> <li>• Remarking of painted signage</li> </ul> </li> </ul>
<b>Liphook</b>	<ul style="list-style-type: none"> <li>• Improve wayfinding <ul style="list-style-type: none"> <li>• Improved signage at Station Road/Midhurst Road junction and Portsmouth Road/Station Road junction</li> <li>• Promote LCWIP aspirations</li> <li>• Promote Lipchis Way walk to encourage visitors to Liphook</li> <li>• Improved signage</li> </ul> </li> <li>• Improve pedestrian access <ul style="list-style-type: none"> <li>• Improve links from station to Bohunt Secondary School</li> <li>• Refurbish tactile crossing</li> <li>• Improved walkways from car park</li> </ul> </li> <li>• Improve access for people with reduced mobility <ul style="list-style-type: none"> <li>• Provide dropped kerb at entrance</li> <li>• New accessible parking bays</li> </ul> </li> <li>• Improve access by bus <ul style="list-style-type: none"> <li>• Liaise with bus operators- possible extension of services from Bordon</li> <li>• Improve bus stop facilities</li> </ul> </li> </ul>
<b>Petersfield</b>	<ul style="list-style-type: none"> <li>• Improve access for pedestrians and cyclists <ul style="list-style-type: none"> <li>• Create more even level crossing surface</li> <li>• Promote LCWIP</li> <li>• Additional town centre map near platform 1 exit</li> </ul> </li> <li>• Improve wayfinding <ul style="list-style-type: none"> <li>• Install additional signage</li> </ul> </li> <li>• Improve access for people with reduced mobility <ul style="list-style-type: none"> <li>• Improve accessible parking space markings</li> <li>• Alter gradients of pedestrian ramps to platform 1 from car park and station road</li> </ul> </li> <li>• Improve access to station by car and reduce congestion in forecourt <ul style="list-style-type: none"> <li>• More formalised kiss and rise/taxi area with shelter</li> </ul> </li> <li>• Improve access to station by bus <ul style="list-style-type: none"> <li>• Explore potential for improved bus frequency</li> <li>• Refurbish bus shelters in forecourt</li> </ul> </li> </ul>
<b>Alton</b>	<ul style="list-style-type: none"> <li>• Increase percentage walking and cycling to station <ul style="list-style-type: none"> <li>• Improve pedestrian access through car park</li> <li>• Improve cycle access through car park</li> <li>• Update pedestrian wayfinding signage</li> <li>• Update cycling wayfinding signage</li> <li>• Increase secure cycle parking within station</li> <li>• Add streetlight near stairs down to Paper Mill Lane</li> <li>• Improve and update motorcycle parking provision within station forecourt</li> </ul> </li> </ul>

	<ul style="list-style-type: none"> <li>• Improve integration between bus and rail and improve access by taxi <ul style="list-style-type: none"> <li>• Improve taxi rank and parking area, to remove conflict with pedestrians</li> <li>• Improve bus interchange to reduce conflict between buses and taxis</li> <li>• Provide shelter for pedestrians waiting for taxis</li> <li>• Improve and increase shelters for bus users</li> <li>• Provide real time bus information at forecourt stop</li> <li>• Update kiss and ride facilities</li> </ul> </li> </ul>
<b>Rowlands Castle</b>	<ul style="list-style-type: none"> <li>• Improved accessibility <ul style="list-style-type: none"> <li>• Provision of a new footbridge with lifts</li> <li>• Provision of a new footbridge with ramps</li> <li>• Provision of a ramped footpath from platform 2 southbound to the Castle Inn car park and onto Finchdean Road</li> </ul> </li> <li>• Old station house reused for community purposes</li> <li>• Longer opening hours of the station booking office and public toilet facilities</li> <li>• Increased parking provision</li> <li>• Improved signage from station to the village centre</li> <li>• Information about local bus services and cycle routes need improvement around the station</li> <li>• Additional seating/benches on each platform</li> </ul>



## Draft response to EHDC’s public consultation on the emerging local plan, deadline for submission 16 January 2023

All the documents are here: <https://www.easthants.gov.uk/planning-services/planning-policy/local-plan/local-plan-consultation>

See in particular “Local plan issues and priorities regulation 18 part 1”

The text below in black is pasted from the consultation. Text in red is PeCAN’s response as submitted on 16 January 2023.

### Vision

To provide clarity on the type of place East Hampshire is anticipated to be, and what it will seek to achieve from development, the Local Plan should set out a vision. The vision should be ambitious, but achievable.

**“By 2040 our residents will live in healthy, accessible and inclusive communities, where quality homes, local facilities and employment opportunities provide our communities with green and welcoming places to live, work and play and respond positively to the climate emergency.”**

### Vision consultation questions

**VIS1** How do you feel about this vision? (very happy / happy / neutral / **unhappy** / very unhappy)

**VIS2** Does the vision cover the key matters of importance that the Local Plan can influence and inform? (Y/N) **VIS2a** If no, please tell us what is missing from the vision and why this is important.

The vision contains important elements but lacks the climate and nature ambition to support the “greenest ever” Local Plan. For example, it does not mention the nature crisis or the need to reduce greenhouse gas emissions, the words “respond positively to the climate emergency” suggest only a modest improvement, and the reference to quality homes and green places does not include low emission buildings.

It could be re-worded in a more ambitious and inspiring way. For example see the vision statement in the Cambridge City and South Cambridgeshire District Councils’ Local Plan:

“We want Greater Cambridge to be a place where a big decrease in our climate impacts comes with a big increase in the quality of everyday life for all our communities. New development must minimise carbon emissions and reliance on the private car; create thriving neighbourhoods with the variety of jobs and homes we need; increase nature, wildlife and green spaces; and safeguard our unique heritage and landscapes.”

**VIS3** Should the vision be more specific about areas of the district being planned for through the Local Plan? (Y/N). **VIS3a** Please explain your answer.

The vision could refer to the precious landscapes and habitats in our district that need protecting.

**OV1** Please sort these key issues and priorities in order of importance to you.

Climate Emergency 1

Environment 2

Infrastructure 3

Types of Housing Needs 4

Population and Housing 5

### Climate Emergency consultation question

**CLIM1** Do you agree that new development should avoid any net increase in



greenhouse gas emissions, wherever practicable? (Y/N)

**CLIM2** So far, you've told us the following - but what's most important to you? (Sort in order of importance).

**That all new buildings should be zero carbon 1**

**That every new development should have renewable energy provision and that any wind or solar development must be inkeeping with the locality and its surroundings 2**

**That the construction of new buildings should use less fossil fuels and more recycling of materials 3**

**That trees and other green infrastructure could play an important role in reducing flood risks 4**

**That climate change policy should clearly identify the impacts on water availability, with water consumption being reduced in new developments, including by reusing it on site 5**

A best-practice definition is considered to be one whereby:

- The energy consumed by a building's occupants is taken into account and reduced as far as possible. This would mean considering all of the energy consumed, not only that which is regulated by the Government's Building Regulations;
- The remaining energy demand is met with the equivalent amount of renewable power generation, either onsite or offsite;
- The remaining carbon dioxide emissions that are associated with a building (e.g. through making or obtaining its building materials) are estimated and reduced, wherever practicable.

#### **Climate Emergency consultation question**

**CLIM 3** Do you agree that the Council should define 'net-zero carbon development' in this way? (Y/N)

**CLIM3a** If you answered 'no', how should the definition be improved?

PeCAN broadly supports the definition but have selected 'no' so that we can suggest some tweaks: to exclude fossil fuels, to ensure additionality of new renewable energy, and to strengthen the treatment of embodied carbon.

We agree that the definition should include unregulated energy use; this would encourage building designs that cater for all energy use, including EV charging.

We would like to see the first bullet point amended to exclude fossil fuels completely for new buildings, for example by adding the words "including no onsite combustion of fossil fuels" to the end. Alternatively, the text could be amended to refer to emissions from energy as well as primary energy use, for example: "The GHG emissions from energy consumed and the amount of energy consumed ... are reduced as far as possible".

We support the idea that new buildings should not be connected to the gas network: full decarbonisation of heating will require electrification so any gas connection would be an unnecessary expense, while experts are starting to agree that hydrogen heating via the gas network is probably not going to be viable (see House of Commons Science and Technology Committee, "Hydrogen is not a panacea for reaching Net Zero, warn MPs", 19 December 2022). As viable technologies to heat homes without fossil fuels already exist, this should become a planning requirement as soon as possible.

The second bullet point seeks to match the additional energy demand created by new buildings with renewable energy generating capacity. Since planning rules cannot easily govern the choice of energy tariffs by future occupants, we assume that the intention is to match new demand with newly installed renewable energy generating capacity, on or offsite. If so, we support the idea as a planning principle and can imagine it would increase local resilience and energy self-sufficiency (even though seasonal variations would mean developments will still need access to the electricity grid). For this principle to be effective, new build approvals would need to require the developer to build or commission additional onsite or offsite renewable generation up to the expected energy demand of the development (above what can be produced onsite). This, in turn, would need to be facilitated in



the Local Plan by identifying suitable sites and policies for solar farms etc.. To ensure additionality, developers should have to build or commission the additional offsite generation themselves and not be allowed simply to purchase carbon credits or to provide financing to third party solar projects that would have gone ahead anyway.

The East Hants proposal on operational emissions is similar to one in the Winchester City Council's draft Local Plan, with the difference that for WCC all new generation must be onsite, which raises the question whether EHDC's offsite option is even necessary (WCC draft Local Plan, policy CN 3 'Energy efficiency standards to reduce carbon emissions' says "Onsite renewables to provide 100% of the energy consumption that is required by residential buildings, for example through the installation of photovoltaic solar panels or other suitable forms of renewable energy generating schemes that are appropriate for the location or the setting" [https://winchester.citizenspace.com/policy-and-planning/local-plan-regulation-18/supporting\\_documents/Regulation%2018%20Local%20Plan.pdf](https://winchester.citizenspace.com/policy-and-planning/local-plan-regulation-18/supporting_documents/Regulation%2018%20Local%20Plan.pdf))

Some basic technical guidelines may be needed to control this, for example to clarify over what time period to measure generating capacity and demand and how to treat factors such as generating efficiency, time of use, and storage availability.

We welcome the inclusion in the third bullet point of emissions from building materials, i.e. embedded emissions. We support the idea of requiring whole life cycle non-operational emissions to be estimated in advance, especially for larger developments. While for methodological reasons it may be too soon to make low embodied carbon a mandatory requirement, making these estimates public through the planning process should create positive incentives. In the absence of fixed guidelines for measuring embodied carbon and the likelihood that sustainable construction techniques will improve over the life of the Local Plan, we wonder if it is possible for the policy to be written in a way that allows it to stay current when talking about the estimation and disclosure of whole life emissions, and the use of techniques and materials that minimise embodied emissions, for example by referring to best efforts and current industry best practice?

The third bullet point could be strengthened to steer applicants towards carbon negative design, for example by amending the text to ensure that the building's non-operational (or embodied) emissions "... are estimated and reduced as much as possible including by sequestering carbon in the building itself (such as through the use of timber and other organic materials that can help to make buildings carbon negative)", or similar wording.

We welcome that the proposed net zero definition does not feature carbon offsets and rightly focuses on preventing emissions in the first place or, for residual operational emissions, on matching new demand with new renewable supply.

In response to the question in the Climate Change background paper, top of page 8, we do not think that offsite reductions in energy use, for example by paying for energy efficiency measures elsewhere, are suitable as a "last resort" offset to reach net zero because (i) it would be difficult to prove equivalence between the residual energy usage and related emissions in the new development and the energy use and emissions avoided elsewhere, (ii) in carbon accounting terms, avoided emissions do not recoup prior emissions, (iii) it would undermine the energy hierarchy by allowing developers to pay for energy efficiency elsewhere instead of reducing emissions at source, and (iv) it is impossible to know whether the offsite energy efficiencies would have happened anyway and are therefore additional.

#### **Climate Emergency consultation question**

**CLIM4** In the future, should the Council's policies on the design of new buildings focus more strongly on tackling climate change in accordance with the energy hierarchy? (Y/N)

**CLIM4a** If you answered 'no', how should we balance the design of new buildings with the need to tackle climate change?



PeCAN supports the use of the energy hierarchy and hope that planners can find a way to enforce its sequential application and create policies that make it difficult for developers to skip to the bottom layer.

Renewable energy generating technologies could be defined broadly to include technologies such as microgrids, energy storage, community energy projects and district heating.

Where offsets are used as a last resort, for them to count as net zero they would need to fund the permanent sequestration of prior emissions and not the avoidance of future emissions (i.e. trees and direct capture - yes, paying for renewables or energy efficiency elsewhere - no).

We would distinguish between policies that seek to remove residual GHG emissions as an offset, and policies that try to match new energy demand with new energy production (see answer to CLIM3a). In the first case, the outcome would be assessed by how much carbon has been removed versus how much has been added. In the second case, matching energy demand and supply, the outcome would need to be assessed by the amount of clean electricity that can be generated versus the additional demand.

#### **Climate Emergency consultation question**

**CLIM5** Should the detailed criteria for tackling climate change be specified in any of the following:

**In the emerging East Hampshire Local Plan** **Y**

**In future neighbourhood plans** **Y**

**In local design codes** **Y**

**CLIM5a** Please explain your answer.

The different planning documents should be coherent with each other in regard to climate goals and avoid creating opportunities to challenge or circumvent climate related policies, while allowing for different levels of detail.

Design Codes and Neighbourhood Plans should be required to consider the climate and nature crises and they should include climate and biodiversity goals. They should explain how any possible trade-offs between aesthetic and environmental goals should be resolved, such as by recommending more sensitive implementation of technologies (roof-integrated vs roof-mounted solar PV, window frame materials and design, placement of water butts and equipment etc.).

#### **Climate Emergency consultation question**

**CLIM6** How do you feel about using the idea of living locally to influence the location of new homes? (Very happy / **Happy** / Neutral / Unhappy / Very unhappy).

**CLIM6a** Please explain your response.

PeCAN supports the idea of 20-minute neighbourhoods and welcome the recognition that reducing distances travelled is a key part of reducing transport emissions (i.e. not only focussing on EVs). We would welcome:

- a commitment to integrate land-use planning with transport planning, so the Local Plan can ensure that new developments are on sites that can be accessed by walking and cycling;
- Active Travel policies in the Local Plan (e.g. to promote cycle and walking routes, secure parking areas, e-mobility charging etc.);
- an opportunity for us and other community groups to contribute to the further development of the LCWIP.



We believe that a safe, accessible, and well-connected movement network for pedestrians and cyclists plays a key part of all high quality and successful neighbourhoods, as well as helping to reduce carbon emissions and to improve the health of residents by encouraging physical activity.

The key tenets of the 20-minute neighbourhood concept should play a major role in site selection. Providing ready access to services without resorting to private car use is important. The consideration of walkable distances should be given priority when identifying sites. We are aware of some of the complexities of delivering 20-minute neighbourhoods within the planning process, nevertheless we would encourage you to proceed. A recent report by Sustrans spelt out some of the difficulties, see Sustrans, Walkable Neighbourhoods, May 2022. In East Hampshire and in other places, we have observed new housing developments which are too far away from existing services but are too small to justify bus services and other amenities. Hence, we wish to ensure that the mistakes of the past are not repeated.

Clearly 20-minute neighbourhoods are not “islands”. They need walking and cycling (or public transport) connections to a wider town or village. Delivering 20-minute neighbourhoods involves a detailed understanding of the opportunities and challenges for these connections in a particular place. Ideally a mature Local Walking and Cycling Infrastructure Plan (LCWIP) for East Hampshire would be available to provide information about the opportunities and challenges for walking and cycling connectivity for the settlements in East Hampshire. However, we anticipate that the immaturity of this document may cause difficulty when delivering 20-minute neighbourhoods, unless urgent progress is made. We note that work started on this document 5 years ago but that it remains under development, as acknowledged in HCC’s progress update on LCWIPS (dated 7th November 2022). We are aware of some limitations with this document that have not been acknowledged. We would welcome an opportunity to discuss how the LCWIP for East Hampshire may be improved such that it can be used to help to deliver 20-minute neighbourhoods.

It is well documented in nationwide surveys that people are reluctant to routinely cycle, and to some extent to walk, if they feel unsafe when doing so (this was confirmed in the local survey reported in the LCWIP for East Hampshire). Many local roads and crossings feel unsafe for walking and cycling, as demonstrated by evidence set out in the LCWIP and elsewhere. This includes some parts of designated cycle routes (62% of on-road sections on the National Cycle Network have been rated as “poor”, see: Sustrans, Paths for everyone, Sustrans’ review of the National Cycle Network, 2018). Developers cannot be expected to design the onward walking and cycling connections beyond their sites but they can support them in their design.

As developments where cars are used less would need less car parking, we wonder if this extra space could be allocated for green infrastructure.

#### **Population and Housing consultation question**

**POP1** How you think we should proceed? (select one option):

- Use the standard method for calculating housing need as the basis for determining the requirements against which the five-year housing land supply and Housing Delivery Test are measured
- Further explore whether exceptional circumstances exist to be able to devise a revised local housing requirement

**POP1a** Please explain your answer.

PeCAN supports meeting the demographic housing needs of the district and policies to make housing more affordable. However, as explained below, we do not see how the over-construction of new private housing units would contribute to either of these goals. We therefore hope EHDC can use the recent government change of policy on housing targets to establish a housing target that meets the community’s demographic needs without adding unnecessary construction that harms the environment.





The government recently U-turned on mandatory housing targets, after a rebellion by Conservative backbench MPs: "Housing targets should be scrapped, because they are undermining local control over planning decisions and creating pressure for development, which is damaging to the local environment and to the quality of life of our constituents," said Teresa Villiers MP in the House of Commons, after tabling an amendment to the draft Levelling-up and Regeneration Bill (<https://bills.parliament.uk/bills/3155/stages/17044/amendments/10003228>).

The government responded on 5 December 2022, saying that "housing targets remain, but are a starting point with new flexibilities to reflect local circumstances" and the government would consult on how these can better take account of local density (see <https://www.gov.uk/government/news/communities-put-at-heart-of-planning-system-as-government-strengthens-levelling-up-and-regeneration-bill>).

We do not know yet how those flexibilities will operate. However, for East Hampshire we note that the overall housing need has been calculated at 632 new homes per year, of which only 381 reflect predicted demographic changes and 251 reflects an uplift for 'market signals', i.e. to over-build by 251 units a year in the hope that this will lower house prices in East Hampshire.

The construction of 251 surplus homes would increase the housing stock in East Hants by a little under 0.5%. The OBR estimates that each 1% increase in housing stock reduces house prices by around the same percentage (Working Paper No. 6, July 2014, chart 3.2). Assuming this also applies in East Hampshire, reducing local house prices by less than 0.5% a year will not be any help for first time buyers who face an all-time high affordability ratio of 14.51x earnings (up from 5x in the 1990s).

Instead, we hope national policymakers will tackle the affordability crisis by promoting a better mix of tenures with more social and affordable housing, and by enacting mortgage reforms, which the OBR says are up to eight times more effective in reducing house prices than increasing the supply of new homes, among other things (for more on reforms that could improve housing affordability, see the report by Positive Money, 'Banking on Property', March 2022).

We also note that the 2021 census shows that the average number of households in East Hampshire increased by 11.5% since 2011, faster than the 8.7% increase of population, while the average number of people per household fell from 2.45 in 2011 to 2.39 in 2021. Comparing the 2021 census data on households with the government's Live tables on dwelling stock (Table 100) shows that there was already a surplus of more than 2000 dwellings over households in East Hampshire in 2021. Taken together, these data suggest that if there is a barrier to household formation in East Hants, it is not caused by a lack of supply.

An option that we would support for the Local Plan is therefore to adjust the target to meet the demographic need, i.e. 381 across the district, or 319 in the Local Plan Area.

### **Population and Housing consultation question**

**POP2** Are there any strong reasons not to use the housing need figure of 517 new homes per year for the Local Plan? (Y/N)

**POP2a** Please explain your answer.

PeCAN thinks the government's new flexibility around housing targets should be used to reduce this number from 517 to 319 by removing the 'market signals' uplift in full (see answer above).

If the uplift must be retained to some degree (which we hope it won't), then it should be based on different, perhaps more up to date, data to avoid locking in a historically high affordability ratio for the duration of the plan.

The affordability uplift used is 166%, based on ONS 2022 median affordability ratio of 14.51 which itself is based on data up to September 2021. This data point is after the pandemic pushed house prices up but before the increase in interest rates started to push prices down. House prices nationally



are now falling: Nationwide reported in December 2022 that house price growth had fallen for four months in a row and predicted a further 5% fall in 2023. In addition, inflation is likely to increase wages in future, which would tend to reduce the affordability ratio, meaning that the 14.51 affordability ratio from September 2021 could overstate affordability over the next ten years. Updating the data even by a few months would reduce the target by a meaningful amount. For example, using a median house price of £470,715 (East Hants, Aug 2022, Land Registry, Alton Herald) and average earnings of £35,914 (East Hants, FY 2021, ONS ASHE Tables 9 and 10), gives an affordability ratio of 13.10, which reduces the adjustment factor from 166% to 156% and the overall target from 632 to 598. Alternatively, using a pre-pandemic (2020) affordability ratio of 12.31 would reduce the overall target from 632 to 579, before splitting between the Local Plan Area and SDNP.

That said, we feel that a sensible approach in light of the new flexibilities would be to base the housing target on actual predicted demographic need, i.e. the 381 homes per year needed to satisfy predicted growth in households from 2022 to 2032, of which 319 would be needed in the Local Plan Area and the remainder in the SDNP.

Any numerical reductions that can be achieved would reduce the environmental and climate costs associated with building new homes for which no demographic need or benefit has been demonstrated, while ensuring that enough new homes are built to meet demographic needs in the district.

#### **Population and Housing consultation question**

**POP3** Based on the above should we meet:

- All the housing needs of East Hampshire's part of the SDNPA
  - Some of the housing needs of East Hampshire's part of the SDNPA
  - None of the housing needs of East Hampshire's part of the SDNPA
- (select one option)

**POP3a** Please explain your answer.

A split between the two areas seems reasonable.

#### **Population and Housing consultation question**

**POP4** At present we do not know the precise amount of unmet need but we are aware of our neighbours seeking help, therefore do we: (select one option)

- Offer to assist with all unmet needs, regardless of scale and location;
- Offer to assist with some unmet needs, where there may be a direct relationship with the communities of East Hampshire;
- Do not offer to assist with any requests from our neighbours.

**POP4a** Please explain your reasons.

PeCAN suggests that any offers to assist neighbours with their unmet housing needs be limited to considering only their demographic needs, not their housing target based on market signal uplifts.

If the unmet needs at neighbouring LAs have been calculated using affordability uplifts for market signals, they are likely to overstate the demographic need because the targets will have been artificially inflated to reflect the market signals uplift in the Standard Method (see answers above). The benefit of helping neighbouring LAs would thus be administrative, allowing them to comply with centrally set targets rather than meeting actual demographic housing needs, while the environmental costs for East Hants in building more homes would be very real and not justified by any actual housing need.

Given the recent announcement from the government to move away from mandatory housing targets, this should be an opportunity to focus on the housing that is needed while preventing environmentally harmful over-construction.

#### **Types of Housing consultation question**

**HOU1** What should a specific policy on older persons accommodation include? (select one or more options)



- A specific target in terms of numbers of homes for older persons accommodation to be delivered within the plan period
- Specific types of homes to be provided
- The location of these homes across the district

**HOU1a** Please explain your reasons.

**HOU2** Is there anything else that should be included in this policy?

#### **Types of Housing consultation question**

**HOU3** Should the Local Plan include a specific policy on adaptable housing? (Y/N)

**HOU4** Should there be a requirement on large sites for a percentage of new homes to be adaptable?(Y/N)

**HOU4a** Please explain your answer.

As with all buildings, the more adaptable they are, the less structural renovation and new construction would be needed to facilitate a future change in use or need, which should save both costs and carbon emissions in future. For example, two-bedroom homes are more adaptable than one-bedroom homes.

#### **Types of Housing consultation question**

**HOU5** Should the Local Plan include a policy to specify the percentage of smaller homes on development sites? (Y/N)

**HOU5a** If yes, should this percentage focus on:

- 1-2 bed homes
- 2-3 bed homes (select one option)

**HOU6** Should a percentage of smaller homes to be provided on:

- All development sites or
- Only large development sites (over 10 units) (select one option)

**HOU6a** Please explain your answer.

#### **Types of Housing consultation question**

**HOU7** The current requirement is that 40% of new homes on qualifying sites are affordable homes. Should the % requirement for affordable homes be:

- Increased
- Decreased
- Stay the same (select one option)

**HOU7a** Please explain your answer.

Affordable homes on average have fewer bedrooms than market homes (HEDNA 2022 table 9.14 to 9.16). This is not ideal because households that need fewer bedrooms do not always need an affordable home (e.g. 'empty-nesters' or smaller, more affluent households) while those who do need affordable homes may also need more bedrooms (e.g. young families).

The mismatch could increase travel emissions by causing families to live further away from their jobs, families and friends in order to find affordable housing.

It could therefore be useful for the planning authority to track and seek to increase the overall number of affordable family homes in the district, in addition to the percentage of newly built homes that are deemed affordable.

We appreciate that the definition of "affordable" (linked to house prices and not income levels) is a national policy issue.

#### **Types of Housing consultation question**

**HOU8** Are there any other forms of housing that the Local Plan should refer to? (Y/N)

**HOU8a** If yes, please state what other forms of housing.



### Environment consultation question

**ENV1** Which of the below environmental considerations is most important to you? Sort in order of importance, from the most important to the least.

- Achieving improvements to local wildlife habitats; **1**
- Creating better natural links between existing habitats. **2**
- Protecting the most vulnerable existing protected habitats and species; **3**
- Conserving the character of rural landscapes; **4**

### Call for Sites – ‘Green Sites’

These include Suitable Alternative Natural Greenspace (SANG), Biodiversity Net Gain and/or Nutrient Neutrality mitigation sites.

We need to know where land could be suitable for:

Suitable Alternative Natural Greenspace (SANG) – this is the name given to the green space that is of a quality and type suitable to be used as mitigation in the context of the Wealden Heaths Phase II Special Protection Area (SPA). The land should be within close proximity to the Wealden Heaths Phase II SPA.

Biodiversity Net Gain (BNG) – Sites for BNG offsetting should have the potential to buffer or expand existing habitats. For example, connecting woodland blocks, buffering ancient woodland and species rich grassland creation.

There is no minimum or maximum site area.

Exceptions are private gardens or sites already designated for wildlife value i.e. SSSI, Local Wildlife Site

Nutrient Neutrality – Nutrient neutrality is a means of ensuring that a development plan or project does not add to existing nutrient burdens within catchments, so there is no net increase in nutrients as a result of the plan or project. Suitable mitigation measures might include constructed wetlands, changes in land management or retrofitting Sustainable Urban Drainage systems within the catchment of the impacted site(s).

**Please do not use this call for sites to suggest or resubmit site suggestions for housing.**

**CFS2** Please describe where the land is and provide an address if possible (e.g. street name, local area, what landmarks are nearby)

PeCAN is concerned about the purpose of listing a number of sites as potential SANG, BNG and NN mitigation sites, especially in consideration of EHDCs stated aim that offsetting should be a last resort. The purpose of this exercise would appear to be future offsetting. Developers must be required to prioritise - and show that they have prioritised - onsite avoidance and mitigation of biodiversity loss, as well as 10% BNG, and provision of climate change adaptation, for example by incorporating Sustainable Urban Drainage systems (SUDs), green roofs and other rainfall and carbon storage measures. Use of the borrowed local landscape for these purposes, if appropriate, must be decided locally.

The ‘nutrient neutrality’ proposal, paid for by water companies and developers, which entails creating wetlands and field margin buffer zones in order to soak up farm-based runoff and/or treated effluent discharges, might have the potential, over a long period, of mitigating some biodiversity losses in the wider countryside, but should not be seen as an alternative to changing farming, developer and water company practices. Nutrient overloading must be tackled at source, which will include intensive farming being replaced by extensive farming, on-farm (and on-estate) compost systems, biogas systems and other measures that prevent excess nutrients entering the natural environment. A



requirement for prevention of nutrient escapes to the environment could be part of the planning tool for EHDC.

Related to this is the question of preserving Local Natural Capital. We propose supplementing the hierarchy of “acceptor sites” above with a regionally agreed map of areas whose prime purpose is to provide ecosystem services (these are not necessarily designated areas, but natural/semi-natural/farmed and/or public areas) and for these areas, plus a buffer zone, to be recognised as ‘off limits’ for development. In this scenario, East Hampshire’s Natural Capital areas would not be used to offset development, nor used as nutrient “dumps”, but instead recognised as mitigation assets in their own right, serving the higher purpose of ameliorating climate change and helping to reduce biodiversity loss, locally and regionally.

Defra has recently launched its “Enabling a Natural Capital Approach” (ENCA), an online resource that helps landowners, farm clusters and local authorities map their Local Natural Capital:

<https://www.gov.uk/guidance/enabling-a-natural-capital-approach-enca>

**CFS2a** Please upload any maps or photos of the land you are suggesting to our digital engagement platform.

#### **Infrastructure consultation question**

**INF1** What type of infrastructure is most important to you? (Sort in order of importance)

Transport / Health / Schools, colleges / Community facilities / Sport / Green spaces / Energy supplies and water / Internet and mobile phone reception.

#### **Infrastructure consultation question**

**INF2** How do you feel about the allocation of CIL funds to date? (Very happy / Happy / Neutral / Unhappy / Very unhappy).

#### **Infrastructure consultation question**

**INF3** Which of these do you think provides the best outcome for infrastructure provision? (Select one option)

Many small sites dispersed across the district / Medium sized sites / Large sites / A mix of these

**INF3a** Please explain your answer.

Please note the answer refers to INF2. The 12 factors that EHDC considers when determining whether schemes should be funded by CIL do not mention climate change mitigation or adaptation and make only a vague reference to environmental needs in factor 5. We would like to see the factors updated so that infrastructure spending gives a high priority to decarbonisation, climate change adaptation, or protecting and restoring nature. This would make it easier for CIL money to support community energy generation, retrofitting of public buildings, and restoration of land, among other things. The list of factors should expressly reference EHDC’s Climate and Environment Strategy and ensure that all CIL-funded projects do not harm the climate or environment.

#### **Development Strategy consultation question**

**DEV1** Please rank these options in order of preference

- Option 1: Disperse new development to a wider range of settlements
- Option 2: Concentrate new development in the largest settlements
- Option 3: Distribute new development by population
- Option 4: Concentrate development in a new settlement

**DEV2** Why have you ranked the options in this way? (Please give reasons for your chosen ranking)



### Development Strategy consultation question

**DEV3** Are there any alternative options we should consider? (Y/N)

**DEV3a** If yes, please explain.

Two additional options could be considered:

20-minute neighbourhood option - Developments that result in new 20-minute neighbourhoods would help to prevent the growth of transport emissions. 20-minute neighbourhoods could be built from new or created by adding amenities and infrastructure to existing settlements, alongside new housing.

Brownfield option - To the extent that some of the housing need could be met from brownfield site development and change of use of existing buildings, that could be an option that reduces financial and environmental costs and reduces the number of homes that need to be built on greenfield sites. This might include more focus on higher density developments, such as apartment blocks near to town centres and office conversions, which would reduce the land and environmental footprint of development and could be more suitable for district heating and other shared facilities. That might also help to cater for the expected demographic changes in the district.

### General consultation question

**GEN1** How do you feel about this consultation? (Very happy / Happy / Neutral / Unhappy / Very unhappy).

**GEN2** Is there anything else you would like to tell us in response to this consultation? (please explain).

1. PeCAN greatly appreciates the background information provided with this consultation and the user-friendly, jargon-free way it is presented – thank you!
2. We welcome that the consultation goes above and beyond the NPPF and reflects the importance of tackling the Climate Emergency and the need to improve the quality of the local built and natural environments.
3. The format of question OV1 is unfortunate as it (incorrectly) suggests a trade-off between the climate emergency and other priorities. These are not competing goals: Local Plans are required to take into account population and housing needs and there is no reason why adding a climate priority should weaken those duties or their delivery. If anything, the opposite is the case: not having sustainability policies means that housing and infrastructure projects are more likely to be poorly delivered. The design of the question means that some respondents may give the climate emergency a low priority in order to give a higher priority to housing, for example, but this does mean they think the climate emergency should be a low priority in planning. Perhaps the question would have been better framed as a Yes/No choice for each priority instead of a numerical ranking.
4. In question CLIM1, the words “wherever practicable” should be carefully defined so it describes what can reasonably be done rather than simply what is cheaper for the developer.
5. For question ENV1, the reason for the ranking we give is that protected areas such as SSSI’s, Special Protection Areas and to some extent Local Nature reserves and SINCs, do have protection under the law. Whilst it is true these are nevertheless vulnerable, and, shockingly, not in great health (State of Nature report from the National Biodiversity Network in 2019), they are generally heeded in planning for development. What is under enormous threat are the less precious but nonetheless very valuable local habitats that are disregarded. We simply cannot afford to lose more habitat given the dire rate of biodiversity loss. Examples of these are areas of scrub, outgrown hedgerows, tussocky grass and unimproved swards.
6. We welcome the use of nature-based solutions such as street trees and sustainable drainage, as well as green spaces and green roofs, and hope this concept will be well integrated in policies in the emerging Local Plan.
7. The new Local Plan should support the retrofitting of listed and heritage buildings.
8. The Local Plan should be ready to take advantage of the relaxation of mandatory housebuilding targets.



9. We hope brownfield sites can be prioritised as development sites (e.g. WCC draft Local Plan policy D6, Brownfield development).
10. Is it possible to include a presumption against the loss of any open space, sports or recreation facilities?
11. Larger developments could be required to include allotments or garden space to grow food.
12. We hope that planning for non-residential buildings will also have a net zero ambition. We understand that BREEAM is not a tool for driving zero carbon development and so, if used as a planning standard for non-residential development, the Local Plan may need additional policies, such as to stipulate that space heating is powered from renewable energy sources and to encourage low embodied carbon.
13. The Local Plan would be an opportunity to identify suitable sites for solar farms and other renewable energy infrastructure (especially community-owned), including any updates to the 2018 Renewable and Low Carbon Study in light of the expected relaxation of central government policy on onshore wind and other developments since 2018 (<https://www.gov.uk/government/news/government-to-launch-consultation-on-local-support-on-onshore-wind>).
14. To promote adaptation to climate change, policies could promote features that will increase resilience to power cuts, water shortages, extreme weather and other civil emergencies. As context, the commonest risks in the top right of the Hampshire and Isle of Wight LRF Public Risk Matrix 2021 (i.e. high likelihood and high impact) are natural hazards such as flooding, storms, heatwaves, and heavy snow which are likely to become more extreme as climate change progresses. In general, design and material choices that build self-sufficiency, redundancy and diversity of essential services should improve resilience.
15. Adaptation could also be improved through construction design (see WCC draft Local Plan Policy D9, which calls for orientation, vegetation, and materials to be used to reduce overheating).
16. We welcome EHDC's June 2021 Biodiversity and Planning Guidance and look forward to a robust policy on biodiversity in the new Local Plan. Such a policy could ensure that mature trees are almost never removed (i.e. don't limit protection only to ancient, veteran or 'special' trees) as well as encouraging developers to go beyond 10% legal minimum biodiversity net gain (BNG) where possible. The Council could consider a separate policy to drive nature recovery over larger areas, such as a 'green ratio' or by designating East Hampshire's Natural Capital areas (see answer to CFS2 above). It may be useful to cross-reference the biodiversity guidance in other policy areas, such as the Council's management of verges and green infrastructure.
17. Among other things, we hope that a BNG policy in the Local Plan will include the need to avoid biodiversity loss in the first place, to completely avoid impacts on irreplaceable habitats and protected and unprotected wildlife sites such as ancient woodlands, to properly value biodiversity including in neglected areas such as scrub, to avoid downgrading mature habitats by replacing them with new species-poor habitats, and wording to ensure there is no benefit to applicants who try to lower the biodiversity baseline of a site before applying for planning permission.
18. We hope the planning authority will have sufficient access to ecologists and training to effectively monitor and enforce BNG commitments and to bridge any gaps in the measurement tools that are emerging (for example, Natural England's Biodiversity Metric 3.1 reportedly has gaps in relation to scrub and rewilded land, while version 3.0 had gaps in relation to former mineral sites).
19. Petersfield Climate Action Network (PeCAN) is grateful to the volunteers who prepared this response [REDACTED]. The response has been shared for comment with more than 700 local supporters.

[REDACTED]  
East Hampshire District Council

*By email only*

16 January 2023

Dear [REDACTED]

**Re: East Hampshire District Council – Better Homes Better Places - Portsmouth City Council response**

Thank you for consulting Portsmouth City Council (PCC) on the emerging East Hampshire Plan, Regulation 18 Consultation. The City Council would like to make the following comments.

**Living Locally**

We welcome the emphasis on the focus of the revised settlement hierarchy that emphasises accessibility on foot and by bike, to enable people to live more locally in the future, picking up on some of the key ideas from “20-minute neighbourhoods”. We support development of a settlement pattern that encourages people to use sustainable modes of transport to access Portsmouth from the Southern parishes of East Hampshire District.

**Transport**

In terms of strategic cross-boundary transport initiatives we would like to see a strong commitment to the implementation and enabling of the Southeast Hampshire Rapid Transit Corridors.

**Population and Housing**

We welcome the reference to joint working through the Partnership for South Hampshire and the collaborative work being done by the PfSH authorities on the revised sub-regional planning statement which will inform the statements of common ground between the partners.

PCC's latest draft housing land supply position (December 2022) currently identifies a shortfall of approximately 3,600 dwellings to 2038 against its need as identified through the Standard Methodology. It is anticipated that the City Council's Housing and Economic Land Availability Assessment (HELAA) will be updated in 2023 to reflect the latest position.



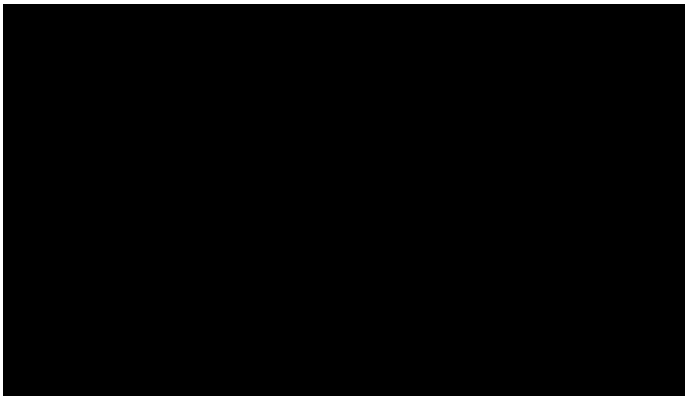
It is anticipated that the City will still have a sizeable shortfall against its Standard Methodology housing number. It is anticipated that the City Council will have to approach its neighbours including East Hampshire District Council either individually or through the Partnership for South Hampshire (PfSH) to ascertain from those authorities if they are able to take some of the City's future unmet housing need.

**Nutrient Neutrality and Biodiversity Net Gain**

We welcome the recognition of the nitrates affecting the Solent and the need for mitigation in the Southern Parishes of Clanfield, Horndean and Rowlands Castle. The City Council will continue to work in collaboratively with East Hampshire District on this matter through the PfSH to deliver a definitive mitigation strategy to achieve nutrient neutrality.

The City Council also welcomes the reference to the collaborative work on Biodiversity Net Gain (BNG) with the members of the Hampshire BNG Steering group.

Yours sincerely



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**By email only:** localplan@easthants.gov.uk

16 January 2023

Dear Sir/Madam

**Re: East Hampshire Local Plan 2021-2040 consultation – Issues and Priorities Regulation 18 – Part 1**

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Thank you for consulting the Royal Society for the Protection of Birds (RSPB). The RSPB continues to engage with the development of East Hampshire District Council's (EHDC) Local Plan to seek the appropriate protection of the internationally important designated sites within and near the District. We have reviewed the East Hampshire Local Plan 2021-2040 – Issues and Priorities Regulation 18 – Part ("the Local Plan") document and its associated supporting documents and have serious concerns relating to a lack of protection for the designated sites based on a flawed and poorly evidenced assessment of Likely Significant Effects arising from the new development within East Hampshire. The RSPB has summarised its key concerns below, and further details can be found in both **Appendix 1** (Habitats Regulations Assessment Screening) **and 2** (EHDC LP Issues and Priorities) of this letter.

Critically, the RSPB is concerned that the *Habitats Regulations Assessment Screening* document is not fit for purpose because of:

- An inappropriate assessment of the HRA Screening stage – mitigation measures must be considered as part of an Appropriate Assessment.
- Likely Significant Effects (LSE) of the Local Plan on the Wealden Heaths Phase I (Thursley, Hankley and Frensham Commons) Special Protection Area (SPA) **cannot** be excluded and a more detailed assessment is required. The evidence referenced to support the no LSE conclusion is inappropriate.
- A lack of mitigation requirements for small-scale development is inconsistent with the legal requirements of the Habitats Regulations and the potential for in combination effects.

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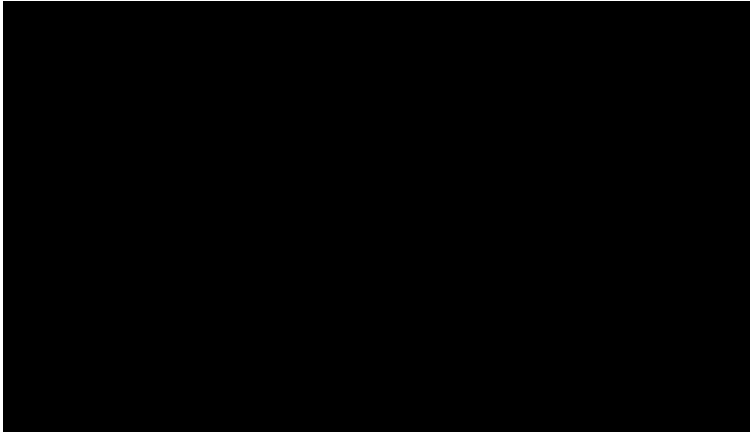
The RSPB is part of BirdLife International, a Partnership of conservation organisations working to give nature a home around the world.

- The failure to consider all impact pathways for Likely Significant Effects on the suite of Special Protection Areas in and around East Hampshire.

RSPBs key points in relation to the EDHC LP Issues and Priorities:-

- The omission of critical steps of the Mitigation Hierarchy to be applied during the Habitats Regulations Assessment process.
- The need for a greater mandatory requirement for Biodiversity Net Gain of at least 20%.
- A lack of reference to all the feature species of the heathland SPAs (Thames Basin Heaths and Wealden Heaths Phase I & II SPAs).

We hope you find these comments useful. We would welcome the opportunity to discuss these comments with you in further detail.



## **Appendix 1: East Hampshire Local Plan HRA Screening Assessment**

### 1. *People over Wind and Peter Sweetman v Coillte*

#### **Mitigation measures cannot be considered at the screening stage, only as part of an appropriate assessment**

Section 2 (Methodology, p. 5-6) of the HRA Screening document outlines the tasks undertaken by this HRA screening report; a screening assessment (HRA Task 1). Para 1.8 (p.2) of the *East Hampshire HRA Screening* document also highlights:

*'In spring 2018, the 'Sweetman' European Court of Justice ruling clarified that 'mitigation' (i.e. measures that are specifically introduced to avoid or reduce a harmful effect on a European site that would otherwise arise) should not be taken into account when forming a view on LSEs. Mitigation should instead only be considered at the AA stage. This HRA has been cognisant of that ruling.'*

The RSPB does not agree that this HRA has been cognisant of the 'Sweetman' European Court of Justice ruling as determination of Likely Significant Effects (LSEs) has been concluded using an evidence base that includes proposed mitigation for potential impacts on an SPA. The RSPB acknowledges this critical distinction between the screening stage of an HRA and the Appropriate Assessment stage, and our comments below regarding the validity of evidence provided for LSEs are in addition to our concerns relating to the above inappropriate assessment of the HRA screening stage.

### 2. *Wealden Heaths Phase I (Thursley, Hankley & Frensham Commons) SPA*

#### **LSE of the Local Plan on the Wealden Heaths Phase I (Thursley, Hankley and Frensham Commons) SPA cannot be excluded**

The RSPB does not agree with the conclusion of the HRA Screening document that *'the emerging Reg.18 Local Plan Housing Options will not result in LSEs on the Thames Basin regarding recreational pressure. The Thursley, Hankley & Frensham Commons SPA and Thursley, Ash, Pirbright & Chobham SAC are screened out from Appropriate Assessment in relation to this impact pathway.'* (para 5.10, p.36).

The RSPB does not consider it is possible to discount LSEs of the Local Plan on Wealden Heaths Phase I SPA given the close proximity of the designation to potential strategic sites and housing allocations (the SPA is 65m from EHDC boundary) and the evidence base for acute recreational and urbanisation pressure. It is therefore critical that a more detailed assessment of the impacts on the Wealden Heaths Phase I SPA is necessary as part of an Appropriate Assessment of the Local Plan.

In its HRA screening assessment for Wealden Heaths Phase I SPA, para 5.9 (p.35-36) provides the following three points as its evidence base for its assessment conclusion:

- *Visitor survey data in the Whitehill & Bordon HRA (a large residential development located within 5km of the SPA / SAC) indicated that no residents from this development use these sites for recreational purposes.*
- *Most residents in East Hampshire District have alternative sites with similar habitats, landscapes and wildlife characteristics much closer to home (i.e. the component parts of the Wealden Heaths Phase II SPA). Given considerably shorter travel durations, new residents are much more likely to visit natural greenspaces that are closer to home.*
- *Most dwellings that will be delivered in East Hampshire in the 5km core recreational catchment of the Thursley, Hankley and Frensham Commons SPA, would also fall within the emerging strategic mitigation zone for the Wealden Heaths Phase II SPA. These developments will need to provide SANG solutions regarding the Phase II SPA, which would also help reduce additional recreational visits in the Thames Basin complex.*

#### Visitor survey data (p.35)

Bullet point 1 (para 5.9, p.35) refers only the Visitor survey data for assessment of Whitehill & Bordon and does not include the rest of the East Hampshire District for which strategic development within its boundary has not been determined. The visitor surveys referenced in para 5.9 relate to the *Whitehill & Bordon Eco Town HRA Visitor Survey*, originally where the relevant survey was conducted in 2009. The RSPB does not consider this to be an up-to-date reflection of visitor patterns across East Hampshire and the use of the designated sites. Changes in visitor pressures and use of sites is also likely to have been exacerbated after the covid-19 pandemic.

The RSPB therefore consider that East Hampshire District needs to be assessed as a whole under the HRA screening process whether LSEs can be excluded on the basis of objective and up-to-date information for Wealden Heaths Phase I SPA.

Further to the above, results from the *Wealden Heaths and Shortheath Common 2018 Visitor Surveys*<sup>2</sup> report clearly show the use of the Wealden Heaths Phase I SPA by East Hampshire District residents.

The *Wealden Heaths and Shortheath Common 2018 Visitor Surveys* report was<sup>3</sup> conducted by Footprint Ecology and commissioned by AECOM on behalf of East Hampshire District Council. The visitor surveys included a total of 457 interviews with a range of questions posed to visitors to the Wealden Heaths Phase II SPA and Shortheath Common SAC. This included providing up to three named alternative sites that users would visit in addition to their current location. Table

16 of the *Wealden Heaths and Shortheath Common 2018 Visitor Surveys* document summarises answers to this question below (Table 1):

**Table 1. Wealden Heaths and Shortheath Common 2018 Visitor Surveys: Alternative named sites ranked by the number of times mentioned by any interviewees, and then considering only the first named sites (Table 16, p. 54)**

	All named sites (number times mentioned, site as a percentage of all named locations)	First named site only (number of interviewees naming site, percentage of interviewees)
1	Devil's Punch Bowl (84, 9%)	Frensham Pond (37, 8%)
2	Frensham Pond (78, 8%)	Devil's Punch Bowl (37, 8%)
3	Waggoner's Wells (54, 6%)	Ludshott Common (28, 6%)
4	Alice Holt (41, 4%)	Waggoner's Wells (24, 5%)
5	Ludshott Common (39, 4%)	Alice Holt (21, 5%)
6	Kingsley Common (25, 3%)	Ludshott (20, 5%)
7	Bramshott (25, 3%)	Kingsley Common (14, 3%)
8	Frensham (25, 3%)	Bordon Inclosure (13, 3%)
9	Ludshott (24, 3%)	Weaver's Down (12, 3%)
10	Bordon Inclosure (22, 2%)	Bramshott (9, 2%)
11	Chapel Common (21, 2%)	Longmoor (8, 2%)
12	Hindhead (17, 2%)	Chapel Common (8, 2%)
13	Weaver's Down (17, 2%)	Deadwater; Bordon; Blackdown; Hindhead Common; Frensham Common (5, 1%)
14	Hankley Common (16, 2%)	
15	Broxhead (13, 1%)	

Table 1 shows Frensham Pond to be the second-most referenced alternative site (78 responses, 8% of the total) for interviewees to visit, and the most referenced site when only including the first named site in their response (37 responses, 8% of the total). Although the results do not specify which Frensham Pond interviewees are referring to, both Frensham Great Pond and Frensham Little Pond are within the boundary of the Wealden Heaths Phase I SPA. Frensham Common and Hankley Common are also both referenced in the interview results; these sites also make up areas of the Wealden Heaths Phase I SPA.

Although only providing a snapshot of access patterns of visitors to the Wealden Heaths Phase II SPA and Shortheath Common SAC, these results clearly show the movement of East Hampshire District residents beyond the East Hampshire District boundary and visiting the Wealden Heaths Phase I SPA. LSEs on the Wealden Heaths Phase I SPA cannot be excluded based on the highlighted potential for East Hampshire residents to visit the Wealden Heaths Phase I SPA.

Alternative sites

Bullet point 2 (para 5.9, p.35) suggests that most residents in East Hampshire District have alternative sites closer to home that are more likely to be visited than the Wealden Heaths Phase I SPA. However, this conclusion is inconsistent with the HRA screening assessment for the Wealden Heaths Phase II SPA. Para 5.2 outlines the results of interviews conducted for the *Wealden Heaths and*

*Shortheath Common 2018 Visitor Surveys*, where 75% of interviewees travelled 6.9km and 3.19km to Kingsley Common and Woolmer Forest, respectively. Further analysis within the report concluded that a mean average of 6.3km journeys were made between interviewee homes and survey points; three quarters of interviewees lived within 3.9km of the survey point. The results indicate that visitors of the Wealden Heaths Phase II SPA may travel a considerable distance in order to use the SPA sites for recreation. In addition to the wide variety of alternative sites in Table 1 that are used by visitors, the RSPB does not consider there to be any evidence to indicate that residents would not visit the Wealden Heaths Phase I SPA, and therefore existing pressures of recreational use of the SPA has the potential to be exacerbated by new development in the East Hampshire District.

#### Existing mitigation under Wealden Heaths Phase II SPA

Bullet point 3 (para 5.9, p.35-36) references mitigation in place for the Wealden Heaths Phase II SPA. This mitigation is proposed in the *HRA Screening* document as a solution to recreational impacts to the Wealden Heaths Phase I SPA. The combination of the Strategic Access Management and Monitoring project (facilitated by South Downs National Park Authority) alongside Suitable Alternative Natural Greenspaces (SANGs) under the Wealden Heaths Phase II SPA is a bespoke package of measures. However, this has not been designed to mitigate pressure on Wealden Heaths Phase I, some measures may be of benefit such as well-design and located SANGs, but this would need to be completed by SAMM measures for Wealden Heaths Phase I. This highlights why it is essential that impacts to the Wealden Heaths Phase I are considered as part of an Appropriate Assessment.

The RSPB would also like to highlight para 5.9 as an example of the inappropriate assessment of the HRA Screening stage; when determining LSEs, a Local Planning Authority cannot take any proposed mitigation measures into account.

The RSPB therefore considers all three bullet points of proposed evidence (para 5.9, p.35-36) to discount LSEs on the Wealden Heaths Phase I SPA as inappropriate. Critically, the RSPB considers that LSEs on the Wealden Heaths Phase I SPA can not be excluded, and therefore should be assessed as part of an Appropriate Assessment.

#### 400m-5km mitigation requirements

Para 5.7 (p.35) states:

*'Natural England have identified a core recreational catchment for the SPA of 5km, including a 400m development exclusion zone and a 400m – 5km mitigation zone. Within that mitigation zone, developments comprising 20 dwellings or fewer do not require mitigation. Flexible mitigation should be provided for developments between 21 – 49 dwellings and bespoke SANG must be identified for developments of 50 dwellings or more. There are presently no SAMM requirements for the site.'*

The RSPB welcomes a 400m development exclusion zone, as urban effects cannot be effectively mitigated within this distance. This has been corroborated by Natural England and by planning inspectors at a number of public inquiries. However, no evidence or justification has been provided as to why residents from smaller developments of 20 dwellings or fewer do not require mitigation. In addition, it is unclear what the definition of flexible mitigation is, and any justification behind its provision for developments between 21 and 49 dwellings in size. This approach is inappropriate and fails to reflect the evidence base on recreational disturbance and the legal requirements of the Habitats Regulations and requirement to appropriately protect the SPA from harm. We urge the Council to adopt a consistent and appropriate approach for all net new residential dwellings within the zone of influence (400m-5km) requiring the need for avoidance and mitigation measures.

Para 5.8 states that "Thursley, Ash, Pirbright & Chobham SAC is covered under the mitigation strategy for the Thames Basin Heaths SPA" it is not clear what is meant by this state. Whilst it details SAMM and SANG it is understood that this is for the Thames Basin Heaths and that there is no SAMM delivery on Thursley. As previously state it is important that the impact on these sites is considered as part of an appropriate assessment whether the mitigation in place and proposed is clearly set out to determine that new housing development will not result in an adverse effect on integrity.

### 3. Incomplete assessment of potential impact pathways

The RSPB does not consider the HRA screening document to be a complete assessment of the potential impact pathways for the Wealden Heaths Phase I and II SPAs, Woolmer Forest SAC, Shortheath Common SAC, East Hampshire Hangers SAC, and Thursley, Ash, Pirbright, and Chobham SAC. The HRA screening document fails to consider wider urbanisation effects or justify why these have been excluded from consideration for the heathland sites, especially Wealden Heaths Phase II SPA, Woolmer Forest SAC, and Shortheath Common SAC. Examples of urbanisation effects on heathland sites include cat predation of designated feature species (notably ground-nesting birds for SPAs) and habitat change as a result of fly tipping / garden encroachment, fire etc. It is essential that a comprehensive assessment of the potential impact pathways is undertaken to provide a robust assessment of LSE of the Local Plan on relevant sites. It is very concerning that these established impacts have been disregarded, they must be considered of any assessment.

### 4. General inconsistencies and omissions

The RSPB would like to highlight inconsistencies and omissions from the *East Hampshire HRA Screening* document. Para 5.4-5.6 contains information relating to the screening for LSEs of the Thames Basin Heaths SPA. The RSPB agrees with the conclusions of EHDC that there are the potential for LSEs and an Appropriate Assessment is required. However, the *HRA Screening* document fails to outline a summary of the Thames Basin Heaths SPA designation, its qualifying features, conservation objectives, and threats/pressures to site integrity, as



shown for all other SPAs, SACs, and Ramsar sites in proximity to East Hampshire District.

Para 5.1 states '*the Wealden Heaths Phase II SPA is designated for two ground-nesting (or low nesting in the case of Dartford warbler) bird species: Dartford warbler, nightjar and woodlark*'. In the same paragraph, it is also stated '*due to the fact that all three species nest on the ground*', which conflicts with the previous passage. The RSPB considers that the three feature species for the heathland SPAs should all be classified as ground-nesting birds when referred to within the *East Hampshire HRA Screening* document and future documents as part of the Local Plan process.

#### 5. Wealden Heaths Phase II SPA

*We welcome the appropriate conclusion that LSE can not be excluded for the Wealden Heaths Phase II SPA. We hope and anticipate that through the Local Plan, a robust approach will be taken to the protection of this designation from the impacts of new development with the adoption of a 400m exclusion zone and the requirement for mitigation in the form of SANG and SAMM for all residential development 400m-5km from the sites, to appropriately reflect the evidence base and best practise.*

## **Appendix 2: RSPB comments relating to East Hampshire Issues and Priorities**

### 1. Mitigation Hierarchy

A brief summary of the 'Mitigation Hierarchy' is provided within the Local Plan document. However, the diagram showing three boxes of the process labelled 'avoid', 'minimise', and 'compensate' omits two critical steps in the Mitigation Hierarchy required before compensation:

1. Mitigation: protective and preventative measures that are taken into account during the Appropriate Assessment stage (if sufficiently certain that the proposed measures will be effective) to determine whether potential harm still remains as a result of development or a development plan process.
2. IROPI: evidencing that there are no reasonable alternatives and there are Imperative Reasons of Overriding Public Interest (IROPI) as to why the development should go ahead. The RSPB acknowledge that this is defined within both the *East Hampshire HRA Screening* document and the *East Hampshire District Council Biodiversity and Planning Guidance (2021)* document.

The above omitted steps of the Mitigation Hierarchy process are critical to its understanding and interpretation. The RSPB therefore consider it necessary for their inclusion in the Local Plan document and any supporting documents providing guidance or summarising the Mitigation Hierarchy and its application in the Local Plan process.

### 2. Biodiversity Net Gain

Advice to Defra from members of the Natural Capital Committee suggests that a level of net gain at or above 10% is necessary to give reasonable confidence in halting biodiversity losses. Therefore, 10% sits as an absolute minimum level of net gain for Defra to confidently expect to deliver genuine net gain, or at least no net loss, of biodiversity and thereby meet its policy objectives<sup>5</sup>. Defra's Biodiversity Net Gain Consultation Impact Assessment also highlights examples of an increase in the required percentage of net gain: *'The Planning authority for Lichfield District requires a net gain of 20% on new development, and experience to date suggests that developers are able to meet this requirement and often achieve much greater levels of biodiversity net gain.'*

The RSPB therefore encourages EHDC to implement policy around Biodiversity Net Gain with a suggested minimum of 20% in order to gain a greater level of certainty for genuine net gain as a result of Biodiversity Net Gain policy and to see tangible net gain benefits for key priority species and habitats in the East Hampshire District. Further information on the recommendation for 20% Biodiversity Net Gain can be found on the Surrey Nature Partnership website<sup>6</sup>. [Paragraph relating to encouraging EHDC to focus BNG on delivering enhancement of corridor links for priority habitats]

### 3. Reference to heathland SPA feature species

Within the Local Plan document multiple references are made to Dartford Warbler as one of the designated site feature species of the suite of heathland SPAs (p. 38 and 40). No reference has been made to the two other key feature species of Woodlark (*Lullula arborea*) and European Nightjar (*Caprimulgus europaeus*). The RSPB considers that this needs to be corrected as this information is currently misleading regarding the significance of the internationally important SPA sites.

### 4. Environment consultation question

**ENV1** Which of the below environmental considerations is most important to you? Sort in order of importance, from the most important to the least.

RSPB response:

1. Protecting the most vulnerable existing protected habitats and species;
2. Creating better natural links between existing habitats;
3. Achieving improvements to local wildlife habitats;\*
4. Conserving the character of rural landscapes.

\* The RSPB considers considerations 2 and 3 to be of equal importance.

### **Appendix 3: The RSPB's interests in East Hampshire**

The East Hampshire District lies within the RSPB's Thames Basin and Wealden Heaths Priority Landscape, identified as of national importance for the work of the RSPB. This is one of our highest priority places in the UK for the promotion of conservation at a landscape-scale, adopting the principles advocated by the Lawton report *Making Space for Nature* (2010)<sup>1</sup>, which recommended (in simple terms) more, bigger, better and more joined up protected areas.

East Hampshire contains important statutory nature conservation designations, including the Wealden Heaths Phase II Special Protection Area (SPA); Woolmer Forest Special Area of Conservation (SAC) and Shortheath Common SAC; and a number of Sites of Special Scientific Interest (SSSIs). A number of nature conservation designations also lie in close proximity to the Council's area boundary, including the Wealden Heaths Phase I (Thursley, Hankley & Frensham Commons) SPA, Thames Basin Heaths SPA, and Thursley, Ash, Pirbright and Chobham SAC.

Due to their proximity these sites should also be considered for potential impacts as a result of the Local Plan and strategic planning and policies within East Hampshire District. The RSPB regards the protection and enhancement of the SPAs, SACs, and their associated and surrounding SSSIs as being among the highest priorities for our work nationally.

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

12 January 2023

Dear Sir / Madam

### **East Hampshire Local Plan Issues & Priorities (Regulation 18 Consultation – Part 1)**

Thank you for consulting the South Downs National Park Authority (SDNPA) on the Local Plan Issues and Priorities Paper (LPIP) for East Hampshire. The SDNPA acknowledges the challenges faced by East Hampshire District Council (EHDC) both in meeting future housing need and addressing the climate emergency.

We note this Reg 18 – Part 1 consultation concerns six high level issues and priorities and a future part 2 Reg 18 consultation will provide the detailed development strategy, allocations and development management policies. Under the six issues we provide general comments and made observations on the consultation questions posed where these are relevant to the SDNPA.

As you are aware, the SDNPA and all relevant authorities – including EHDC - are required to have regard to the purposes of the South Downs National Park (SDNP) as set out in **Section 62** of the **Environment Act 1995**. The purposes are:

- 1) To conserve and enhance the natural beauty, wildlife and cultural heritage of the area; and
- 2) To promote opportunities for the understanding and enjoyment of the special qualities of the national park by the public.

### **The Duty to Cooperate (DtC)**

We support EHDC's continuing liaison with neighbouring authorities, including the SDNPA, to ensure cross-boundary strategic priorities are fully addressed. We would like to take the opportunity to highlight the SDNPA's strategic cross-boundary priorities which provide a framework for these discussions:

- Conserving and enhancing the **natural beauty, wildlife** and **cultural heritage** of the National Park and its setting
- **Biodiversity restoration** at all scales and making nature bigger, better and more joined up
- Mitigation and adaptation to **climate change**, including nature based solutions
- **Sustainable travel** into, within and across the National Park
- The **local economy** and jobs particularly in land management and the visitor economy
- New **homes** including accommodation for Travellers, focusing on affordable homes for local communities
- Green and grey **infrastructure** serving communities in and around the National Park

The SDNPA will continue to work closely and collaboratively with EHDC in relation to the above cross boundary priorities. We note of equal importance is that effective collaboration takes place

with regards to enhancing the natural beauty of the area, especially within the setting of the SDNP. This is similarly the case with green infrastructure, wildlife corridors, and connecting people to the recreational opportunities in the National Park in line with statutory purpose 2 (see above). The South Downs Partnership Management Plan (PMP) is also a material consideration in this respect.

Given the above, we recommend additional text is included in the section covering the “Duty to Cooperate” to recognise the need for a joint approach with the SDNPA, with regards to development and change within the setting of the SDNP and /or close to the SDNP boundary, and to refer to the PMP.

### **Issue: the Climate Emergency**

We support the objective to build zero-carbon homes during the Local Plan period. We are also supportive of a definition of ‘net zero carbon development’ which takes account of all energy consumed through occupation and considers the embodied energy in building materials.

We recognise the pressing need for climate change adaptation and support natural solutions that increase ecosystem resilience, create habitat, and restore natural landscape functions.

We also welcome the emphasis of the LPIP on accessibility on foot or by bike and use of the concept of ‘living locally’, whilst acknowledging the challenges for this in rural areas and the associated importance of retaining village facilities to reduce carbon miles.

### **Issue: Population and Housing**

The SDNPA is in the process of starting its Local Plan Review (LPR). An evidence study of development need has been commissioned. In addition, a call-for-sites for development, biodiversity net gain (BNG), nutrient offsetting and renewables was carried out in Summer 2022.

We are mindful the LPIP was prepared ahead of recent announcements from Michael Gove (Secretary of State for Levelling Up, Housing & Communities) on the planning system in the House of Commons on 06 December 2022 and publication of the consultation draft National Planning Policy Framework (NPPF) on 22 December 2022.

The statement from the SoS referred to the upcoming National Planning Policy Framework (NPPF) prospectus in which housing numbers should “*be an advisory starting point, a guide that is not mandatory*”. Indeed, Mr Gove explained that it will be up to Local Authorities – by working with their communities – to determine how many homes can actually be built and that this will need to take into account what should be protected; i.e., Green Belt, National Parks (emphasis added), the character of the area, or heritage assets etc.

Further to this, the draft text for consultation on the NPPF includes amendments to paragraph 35 stating plans are to be found sound where they seek to meet the area’s OAN so far as possible, taking into account the policies in the Framework.

In addition, we make the following detailed comments relating to the questions posed on this topic:

The Standard Method cannot be easily applied to the SDNP area as 2014 population projections are not available for the geography of National Parks. Planning Practice Guidance (PPG) Paragraph: 014 Reference ID: 2a-014-20190220 states:

“Where strategic policy-making authorities do not align with local authority boundaries (either individually or in combination), or the data required for the model are not available such as in National Parks and the Broads Authority..., an alternative approach will have to be

used. Such authorities may continue to identify a housing need figure using a method determined locally, but in doing so will need to consider the best available information on anticipated changes in households as well as local affordability levels.”

The SDNPA has commissioned an evidence study of development need and this will assess housing need using a methodology consistent with the standard method, incorporating demographic change and affordability levels based on the best available data at geographies appropriate for creating local population estimates for the National Park area.

Reference is made in the LPIP to a disaggregated housing need figure of 115 in the SDNP, this is a provisional figure and will be subject to completion of further evidence. We will continue to work proactively with EHDC towards achieving a robust joint position, which does not pre-empt or prejudice the South Downs LPR.

We also note EHDC are considering assisting in meeting unmet needs of neighbouring authorities. We refer to the above observations on recent SoS announcement and paragraph 176 of current NPPF which states development within the setting of designated areas (incl. National Parks) should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas (there are no proposed changes to this paragraph in the consultation NPPF).

### **Issue: Types of Housing Needs**

The SDNPA acknowledge the challenges faced by EHDC in meeting future housing need, particularly in addressing the needs of an ageing population and the needs of people with a disability or long-term health problem. At this stage of plan making, we are aware that there are no sites within the Reg 18 document. We would welcome any discussions and working together on possible development sites, particularly in considering the impact on setting of the National Park in line with paragraph 176 of the NPPF.

Similarly to East Hampshire District, the SDNP faces issues of affordability. It is recognised that a lack of affordable homes is a major barrier to sustainable communities. Young people and young families in particular struggle to find low-cost housing which can create significant housing need. In 2020, we adopted an Affordable Housing SDP - <https://www.southdowns.gov.uk/planning-policy/supplementary-planning-documents/supplementary-planning-documents/affordable-housing-spd/>

In terms of Gypsy, Travellers and Travelling Showpeople we note the latest version of the GTAA that covered the entirety of East Hampshire District, including the National Park. We would welcome opportunities to work together to meet the future and current need where possible.

### **Issue: Environment**

East Hampshire district has a wealth of wildlife habitats and diverse landscapes. Nature does not stop at administrative boundaries and we welcome opportunities to work together on initiatives to protect, conserve and enhance our shared environment. We also welcome reference to the SDNP special qualities, the landscape being the foundation of which, including its setting, views, tranquillity, and unspoilt places and its distinctive towns and villages. We note the further work undertaken by EHDC on valued landscapes and support the recognition of the setting of the SDNP in this evidence base.

The People And Nature Network (PANN) is a useful evidence base and strategy document to support green infrastructure at both the heathland sites in the north of East Hampshire district and addressing recreational pressure in the south of the district, especially at Queen Elizabeth Country Park and Butser Hill SAC. The PANN can be found here: <https://www.southdowns.gov.uk/national->

**Issue: Infrastructure**

Effective planning and delivery of infrastructure will underpin achieving the vision of the Local Plan. Whilst not wholly within the powers of the district council, we recognise the important role the Local Planning Authority can play in facilitating the provision of services and facilities at the right time and in the right place. Given the climate and biodiversity emergencies, we suggest active travel and green infrastructure should be prioritised. Internet provision is also identified as important infrastructure, and will increasingly be so in achieving energy efficiency, through for example smart metering. Electric vehicle charging is also a form of infrastructure that will be important in the transition towards net zero CO2 emissions.

**Issue: Development Strategy and Spatial Distribution**

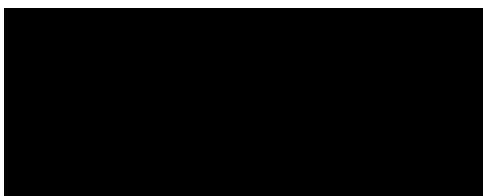
In light of the Section 62 duty of regard and NPPF paragraph 176, the evaluation of options and chosen development strategy should address the potential impact of the distribution of development and subsequent allocations on the SDNP and setting. This is particularly important, given the relationship between large and medium settlements in the district with the SDNP. We advise that this section and the spatial strategy should address these points.

We are supportive of the revised approach to considering settlements based on the concept of ‘living locally’ and taking into account accessibility by active travel. We also recognise the challenges of using the ‘20 minute neighbourhood’ model in a predominantly rural area. A pragmatic response is therefore needed to assess what are reasonable distances that may be made by active travel. In doing so, we suggest it would be helpful to also consider the availability or otherwise of non-motorised user routes which will make such trips more probable.

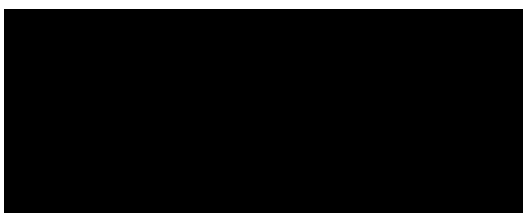
**Summary**

We have provided comments on the six issues and priorities set out in this consultation and look forward to seeing the next iteration of Regulation 18 draft Local Plan. We can confirm that we are committed to continued liaison and joint working towards achieving effective outcomes and would like to wish you well in the progression of your Local Plan. If you have any questions on the content of this letter, please do not hesitate to contact me.

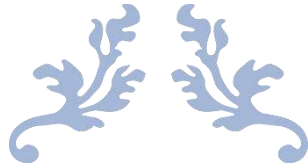
Yours faithfully



Contact:



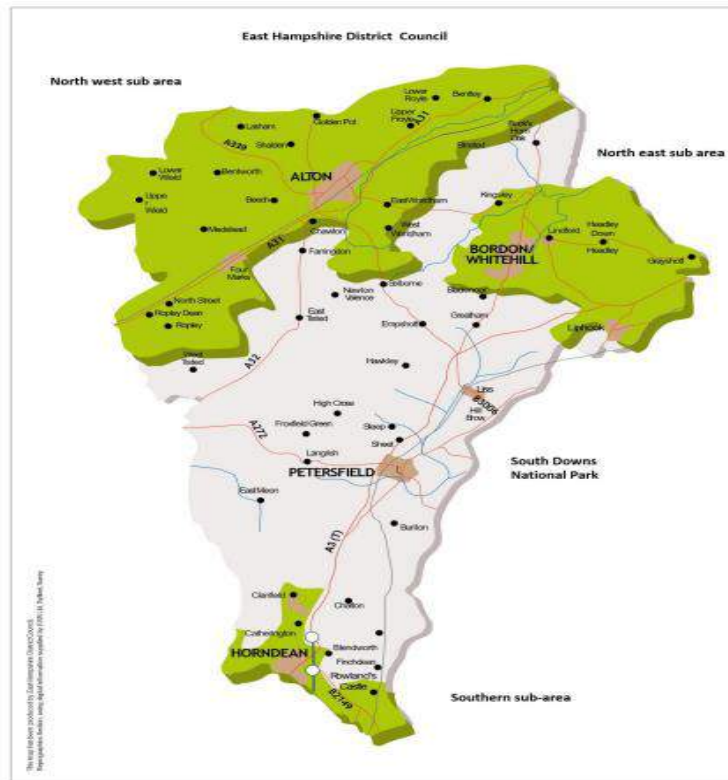




RESPONSE to the public consultation for the EHDC emerging local plan 21/11/22 - 16/01/23

## ‘ISSUES AND PRIORITIES REGULATION 18 – PART 1’

From SMASH – Stand with Medstead Against Speculative Housing





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## EXECUTIVE SUMMARY

### **Background**

East Hampshire (EH) is a rural district in the Southeast of England with a population of c.125,000, of which a whopping 24% are aged 65 and over. The population growth and change for EH for the period 2021 to 2038 shows that the fastest age range for growth is the older age range of 65 plus which is predicted to grow by 43%. This means that EHDC needs to take a strategic approach to addressing the housing needs of the population which it serves.

### **Housing and Economic Needs Assessment ( HEDNA )**

The HEDNA 2022 data shows the predicted and current population change, using this data the biggest area of housing challenge for the community will be the 65+ age group. This implies that 1–2-bedroom dwellings will be needed and where possible within a short and manageable reach of facilities (shops, healthcare provisions, banks, pharmacy.) Taking into account the Gove consultation, older peoples housing needs should also include care homes, independent living, and residential care.

### **Housing needs and numbers**

SMASH believes that EHDC has an opportunity to review the housing need for the whole district. If EHDC takes on board the potential changes in regulation as a result of the Gove consultation, EHDC can reduce the housing numbers and only build what it needs to build based on true need. That number should be determined with input from local communities and should be sensitive to local constraints and concerns. SMASH would expect to be actively involved with these discussions.

Further, Gove says that building at densities which are significantly out of character within an existing area may be a justification for not meeting housing needs in full. We believe that our villages need special protection so that the character and the residents lifestyles are not irreversibly damaged.

### **Affordability ratio**

SMASH believe that the concept of 'affordability ' needs an urgent review. The current Affordability Ratio artificially inflates the amount of housing numbers required. This is because the current methodology uses the national income of a single individual. We believe that a weighted combined "new household" income of £35,082 should be taken into account to assess this ratio as many new households consist of two people.

Further we also believe that affordability should be based upon what level of mortgage a lender might be prepared to loan - it would be better to be guided by mortgage lenders but typically a lender will give 4.5 x the average household income.

SMASH also believe that the proportion of 'First Homes' (where a minimum of 30% discount is given to the first-time buyer) should be increased on larger developments.



## **Over Delivery - our recent delivery performance**

Over 500 houses have been delivered in FM and Medstead in the last 9 years. In the southern part of Medstead alone, in 2017 and in 2018, 133 and 151 respectively were built. This is more than the TOTAL annual housing number allocated to the WHOLE of the SDNP.....This does not seem to be fair or equitable and we expect EHDC to take full account of this and not burden these two villages, but especially Medstead, with more houses.

## **Petition and feedback.**

Within the space of a few weeks, over 1800 petitioners in FM and Medstead, expressed their deep concerns and objections to any notion that EHDC may decide to build large scale housing developments in our villages. The key reasons given for the opposition and objections included – over delivery already, ruination of the villages and village life, unacceptable increase in traffic and pollution, loss of green fields and precious wildlife and facilities being swamped and unable to cope.

## **Settlement Hierarchy**

SMASH have noted that EHDC are proposing that the settlement hierarchy that FM and Medstead currently belong to (tier 3) is changed to a tier 2. The arguments for doing so are flimsy and artificial. If EHDC press ahead with this, it will mean that EHDC have opened the door to building far more houses in our settlement. We and those we represent are strongly opposed to this underhand and sneaky proposed change. Whilst we accept that the concept of a 20-minute neighbourhood is a good one ( i.e., one where the residents can walk to local amenities ) EHDC's proposal absolutely does not fit FM and Medstead at all. The strong sense is that EHDC have contrived to make the tier boundaries so wide and uneven that FM and Medstead are moved up into a higher tier.

For the avoidance of doubt - we are not a 20 minute nor even a 30-minute neighbourhood. There is no 'as the crow flies route' and EHDC have not taken account of the topography and the long hill climb that many residents in Medstead face to reach the majority of the local amenities.

FM and Medstead are not in any way comparable with Horndean (a Tier 2 Settlement ) and we strongly object to this part of the consultation.

Our recent local travel survey should be read, and the findings noted. The majority of respondents use a car to access most amenities, and this cannot and will not change because there is little employment or facilities here.

## **The Options on where houses should be built**

Smash note the 4 options put forward by EHDC on its spatial strategy.

We do not believe that the options put forward are the right options. They are too simplistic and /or contain too little information for meaningful consultation. However, SMASH would want to see serious consideration being given to:

- Housing numbers to match housing needs both in terms of numbers required and the types of dwellings,
- There should be no large housing estates – the 600+ houses in semi-rural villages is no longer a justified strategy,
- The housing numbers must take into account the significant growth of the 65+ age group.



- The fact that FM and M have absorbed over 500 houses in the last 9 years and therefore do not get hit with more than an absolute minimum.
- That any new housing development is situated close to established facilities such as a choice of shops, full healthcare provisions, employment, and social amenities such as cafes, restaurants, sports centres, banks, clubs, and societies. This is the only way of avoiding the use of the car.
- EHDC should first be able to demonstrate that it has forensically examined brownfield sites and its own land before attempting to build on any green land and fields.

### **Department for Levelling up**

On 22nd December 22, the proposed revisions to the National Planning Policy Framework was launched. The consultation period will end in Spring 2023, but the proposed revisions have some very important implications for EHDC and for its planning and housing strategy. It would be prudent to wait for 2-3 months for the consultation to end and the government to announce the changes that it proposes.

There are key changes which will impact the current Local Plan Consultation. This paper highlights the proposed changes which demonstrate that EDHC need to rapidly review and reposition its emerging strategy. Herewith the key proposals :

- The removal of LPAs to continually demonstrate a 5-year housing land supply,
- That uplifts to establishing housing requirements should be prioritised to brown field or underutilised urban sites (and not rural locations),
- Housing needs for older people should be widened to include retirement and housing with care and care homes,
- Past over delivery can be deducted from the housing requirements,
- Building at densities significantly out of character with a local area may be justification for not meeting full assessed housing needs. We believe that this would apply to FM and Medstead,
- The tilted balance test is removed and replaced by a new test of whether adverse impacts are likely to significantly and demonstrably outweigh the benefits of any development.
- The proposed removal of the requirement to satisfy 'unmet' need from neighbouring authorities – thus EHDC will no longer have to consider the National Park and it's housing needs. Your question in the survey refers to this.

Given the above and the positive impact that the changes could have for the population of EHDC, we think it would be irresponsible for EHDC to continue to progress the local plan until Michael Gove's consultation and NPPF revisions is completed.



**RESPONSE to the public consultation for the EHDC emerging local plan 21/11/22 - 16/01/23**

**‘ISSUES AND PRIORITIES REGULATION 18 – PART 1’**

Background

East Hampshire is a rural district in the Southeast of England. It contains three major towns Alton, Petersfield, and Whitehill and Bordon which account for a third of its population. It also contains a number of larger villages, small villages, and hamlets each with their own heritage, characteristics, and aspirations for the future. East Hampshire is renowned for its beautiful countryside, 57% of which is within the South Downs National Park (SDNP).

The population of East Hampshire is ca. 125,000, 58% of which are between the ages of 16-64 and 24% are 65+. Following current demographic trends, the 65+ group is predicted to increase by a whopping 43.5% over the period of the emerging plan. This is unprecedented and will need addressing in the local plan. See later.

EH is unique, it’s like no other county. It’s a wonderful place to live, bring up a family and retire to. It’s one of the main reasons people have moved here in the past. Preserving and enhancing this character, unique landscape and outstanding views should be one of the key elements of any FUTURE planning considerations. As referenced in the Landscape Capacity Study “The local area should otherwise remain generally undeveloped”

The South Downs National Park has been preserved in this way which has enabled past and present generations to enjoy unspoilt landscapes, untainted wildlife, and clean air. It is imperative therefore that areas outside the park are valued similarly and that the uniqueness of our beautiful district is preserved throughout. Otherwise, future generations could experience a very different East Hampshire from today, as illustrated below.



Central Park surrounded by urban development or is it.....

SDNP surrounded by excessive and overwhelming development in the rest of East Hampshire.

Additionally, current global events have highlighted the need for the UK to become more self-sufficient in energy and food production to reduce travel miles and CO2 emissions. EH already provides valuable



farming expertise and contains excellent quality land for food production which will enable local communities to buy food locally and be more intrinsically sustainable.

We believe that we are at a tipping point which could have a massive impact on EH, if inappropriate, out of character huge developments are allowed to flourish and valuable farmland is concreted over.

Yes, we need some more housing, but we need the right numbers in the right places.

Our belief is that the residents are the custodians and guardians of our villages, and with the help of the Leadership of EH, Councillors and MP's, we must strive to keep EH unique. We must preserve its character, its valued landscapes and continue to use its green fields for farming and thus show constraint on new developments in the countryside, now and for future generations so that its residents can live the best lives that they can.

## Basis of response to EHDC Local Plan consultation

SMASH welcome the opportunity to contribute to this consultation. A big thanks to all those residents and supporters that helped us pull this together.

We recognise that the issues raised and the responses required are complex, so we submit this letter in addition to completing the on-line survey. The proposals raised in the "ISSUES AND PRIORITIES REGULATION 18 – PART 1" document are broadly supported and in particular the emphasis and priorities EHDC have given to policies that try to mitigate the impact of climate change, improve the lives of the communities and the quality of the environment. We will not comment on every question in the survey but will focus on the following:-

- Who needs housing in the future?
- How many houses are needed – the numbers?
- Overall housing delivery
- Settlement hierarchy
- 20-minute neighbourhood
- Spatial strategy options

We are cognisant that the National Planning Policy Framework (NPPF) is currently under review after Michael Gove's statement on 5th December 2022. We summarise these potential changes in Appendix 4 and cite Michael Gove's quotes in Appendix 5.

We recognise that the NPPF has not changed yet, but we anticipate that when it does it will be impactful and significant.

Where relevant we will refer to aspects of these changes in our comments.



So given that the NPPF will change in the relatively near future and could significantly affect future decisions and strategies for the district, we believe it would be prudent to pause this consultation until the full impact is known. It would be foolhardy to press ahead when changes are afoot at policy level.

We found the consultation document quite comprehensive but with so many associated references and lengthy background papers, we believe that for many people, it would have been overwhelming and in some cases impenetrable for them to take in all the data and ideas in order to complete the consultation in a meaningful way.

This letter will be sent to our members, supporters, Councillors, and our MP, so it is written in a way that assumes different levels of awareness, understanding and engagement.

### Who needs housing in the future?

The Housing & Economic Needs Assessment (HEDNA) document 2022 shows the changes to population and demographics in our area.

Table 2 Population Change 2021-2038 by broad age bands (linked to delivery of 632 homes pa)

	2021	2038	Change in population	% change from 2021
Under 16	22,288	23,990	1,702	7.6%
<del>16-64</del>	72,234	77,059	4,825	6.7%
65 and over	29,956	42,990	13,034	43.5%
Total	124,478	144,038	19,560	15.7%

Source: Demographic Projections

It is clear that overwhelmingly, the biggest area of change will be in the 65+ age group (43.5% increase).

This data shows that in planning for housing, the 65+ residents needs to be a big consideration. Most of these individuals live as single/couple person households.

Also newly forming households requiring their first homes is a significant demographic that should be considered, along with lower wage households and keyworkers.

The data from the HEDNA would suggest that EHDC should build smaller 1–2-bedroom dwellings for the elderly (e.g., who wish to downsize) and include a proportion of assisted living developments and some residential care homes. New 1,2 and some 3-bedroom houses would also meet the needs of first-time buyers/renters, key workers (including health/social care, hospitality, and retail) and individuals who are currently in poor quality housing. A significant proportion of these dwellings should be ‘affordable’ and should include social housing for rent.

Comments voiced locally collected through a petition (over 1800 signatures) and travel survey (706 replies) and emails to our website would also support this assertion.





## How many houses are needed - the numbers?

As Michael Gove said in his statement ‘there is no truly objective way of calculating housing numbers, however, there needs to be a figure as a starting point,’ but it is not mandatory. Through the changes Michael Gove is proposing, it is hoped that the shackles will be taken away, enabling EHDC to have the freedom to develop realistic housing numbers to reflect local needs not national targets, without fear of Inspectorate reprisal or developers gaming the system.

Data for household growth is based on the 2014 household projections and these figures are used to predict household growth over the next 10 years (2022 – 2032). The HEDNA (2022) sets out the overall housing needs based on the standard method (as detailed in the NPPF) of calculating housing need, disaggregating the number between the LPA and SDNP.

The housing need for the whole district is calculated as 632 homes per year. This means for the LPA (excluding SDNP) the housing need is 517 homes per annum.

When splitting the numbers between the LPA and SDNP we see the following results, which are very similar to those calculated using the standard method.

Table 3 Housing Need split between the two areas

	LPA	National Park
Household Growth (p.a.)	319	62
Affordability Ratio	13.40	17.69
Uplift	59%	86%
Local Housing Need	506	115

*Source: Based on a range of ONS data*

Due to the SDNP covering 57% of EH land area this results in 83% (517) of the houses being crammed into 43% of the remaining area. This leads inevitably to the wrong houses being built in the wrong places. This has also led to the loss of valuable countryside (including farmland) outside the SDNP, the changing of village character in some locations and a loss of the uniqueness of EH as we have described above.

The SDNP is a ‘local constraint,’ and there has always been the possibility of arguing for lower numbers because of this constraint. However, if this position is taken then the current rules in the NPPF say, that these numbers will be subject to increased scrutiny by the Inspectorate with the risk that the Local Plan does not get approved. It now appears that this aspect of the NPPF may well be relaxed as part of Michael Gove’s proposals. See Appendix 4 for further details. We suggest that EH use this opportunity/constraint exception to reduce the LPA numbers as part of the Local Plan Consultation Reg 18.



Currently the LPA (via its Duty to Cooperate agreement) is meeting any unmet housing requirement from the SDNP. We believe that this should end (question in the consultation) as it skews the housing need in both locations. Michael Gove has also stated that he would like it to end to, but no timeframe has been given. If this did end, then EHDC would not be obligated to build the unmet needs of neighbouring area meaning if the SDNP fall short in their building programme, the LPA would then not have to increase its numbers to pick up this shortfall. EHDC should take advantage of this change to further reduce the numbers.

We believe that the LPA has been fulfilling some of the housing need from the SDNP for several years now. What this does is artificially increase the number of houses needing to be built in the LPA, because as the SDNP is not building the number of houses it actually needs, then the population doesn't grow as fast as would be expected as there are insufficient new houses built there, therefore their future needs are reduced. Conversely as more houses are built in the LPA (including some of the needs of the SDNP), then its population grows more. This can be seen in figures from the HEDNA (2022). This results in local housing numbers being skewed as population growth in the two areas is driven more by the number of new houses built and not by true need.

**Table 4 Percentage population increase in LPA & SDNP areas between 2011 and 2020**

Time period	Population increase in LPA	Population increase in SDNP
2011 – 2016	2.7%	1.3%
2015 – 2020	5.1%	2.4%

Although not yet approved, a proposed change being put forward in the NPPF which may affect housing numbers, states that “if there is clear evidence of past over-delivery, in terms of the number of homes permitted compared to the housing requirement in the existing plan, in which case this over-delivery may be deducted from the revision required in the plan”.

FM & M have *consistently* been over plan – The Joint Core Strategy (JCS) indicated a minimum of 175 houses. Approximately 500 were built in the last 9 years. This **over delivery** should be considered in any future plan.

Another component of housing numbers calculation is the are so called ‘Affordability Ratio’ (AR). It is calculated by taking the average market house value, (for EH this is £415,000 - HEDNA) and dividing it by the average national income £28,603 (source ONS). We believe this artificially inflates the ratio and thus increases the housing numbers required. We believe that it is not realistic to solely use the average national income of a single individual, but a weighted average for the income figure should be used, to reflect that many new households will be couples in their twenties/thirties buying or renting a



dwelling together for the first time, therefore a combined income of a household in EH not across the UK, of £33,464 should be included. See Appendix 1 for more detail.

In addition, the average market house value should be amended to just use the local market house price for 1,2-, & 3-bedroom properties (new householders generally do not buy 4- & 5-bedroom houses as their first property). This again would reduce the uplift and make the ratio more representative of the new households being created in EH.

On a related point, we feel the word 'Affordability' is a misnomer. Affordable currently means 20% off the market value of a property. With high house prices in EH, and with new builds typically attracting a 15% premium, this is not affordable for many average income families (including key workers and young people). A fairer way to set truly "affordable" house prices is to base it on 'what mortgage a household could obtain' i.e., 4.5 x average household income.

Alternatively, if this is too radical an idea, then increase the number of "First Homes" included on a development, instead of the usual standard affordable ones. "First homes" are discounted by a minimum 30% vs. market price, sold to first time buyers on a combined income of less than £80,000 and their mortgage needs to fund a minimum 50% of the discounted price. After discount, the first time the property is sold and should be less than £250,000.)

### In Summary

We believe EH have a real opportunity to **recalculate their numbers** using realistic assumptions with much reduced recourse from the inspectorate. Using the ideas above the LPA housing requirement could be significantly reduced. This would take pressure off the LPA for mass house building to meet a number, and may even win the hearts, minds, and votes of the communities that they serve and show they are listening.

### Overall Housing Delivery – including Four Marks & Medstead

Over the 10-year period 2011 – 2021, EH delivered 99.6% of its housing target and in fact over the years 2017 - 2020, it delivered over target. In addition, affordable housing numbers exceeded target (last 5 years to 2021).

Looking more locally in Four Marks and Medstead, over 500 houses have been built in the last 9 years and in Medstead alone, in 2017 & 2018, there were more houses built in the village (133 & 151 respectively) than the TOTAL annual housing number allocated to the WHOLE of the SDNP (which accounts for 57% of the district!). Our community questions the fairness and equity of this, but surely this is proof that villages like Four Marks & Medstead have significantly overdelivered (JCS suggested minimum of 175 houses should be built up until 2028). Enough is enough.

We would like to bring to your attention that c1800+ petitioners in the Four Marks & Medstead area have expressed their concerns/objections about potentially siting 1 or 2 huge urban style housing



estates in their villages, citing over delivery already, lack of facilities, traffic and loss of character and green fields, as some of their issues.

We believe it is only fair that EH should recognise that FM&M have greatly overdelivered housing numbers in the past and be recognised for this, when identifying future sites.

Coincidentally, Michael Gove’s letter of 5<sup>th</sup> December 2022, supports this idea and states *“I want to recognise that some areas have historically overdelivered on housing - but they are not rewarded for this. My plan will therefore allow local planning authorities to take this into account when preparing a new local plan, lowering the number of houses they need to plan for.”*

### Settlement Hierarchy?

Settlements can be towns, villages, or hamlets. Until recently, settlements were categorised in terms of the facilities they provided and their accessibility. Depending on what and how accessible these facilities were in a settlement, then this would inform/give guidance on the number of houses that might/should be built in a settlement. Settlement facilities were audited and scored. This made a lot of sense as it helped balance housing numbers with facilities present.

Table 4 shows the current tier for each settlement.

Tier in Hierarchy	Proposed designation	Proposed Settlements
1	Town	Alton, Whitehill & Bordon
2	Large Local Service Centre	Liphook, Horndean
3	Small Local Service Centre	Holybourne, Grayshott, Headley, Rowlands Castle, Clanfield, Four Marks & South Medstead
4	Settlement with a Small Number of Services	Lovedean, Lindford, Bentley, Kingsley, Medstead, Ropley, Catherington, Headley Down, Arford, Bramshott, Holt Pound
5	Rural Settlement	Passfield Common, Ropley Dean, Bentley Station, Upper Froyle, Bentworth, Beech, Griggs Green, Lower Froyle
6	Other settlements in the countryside	Oakhanger, Shalden, Upper Wield, Lasham

Four Marks & Medstead South were ranked in Tier 3.

This meant that it was suitable for **some** development to meet local needs, but not massive development.

However, facilities in FM&M have not kept pace with the huge house growth over the last 9 years. EHDC are now proposing that the Settlement Hierarchy strategy be changed to follow a 20-minute neighbourhood concept, which emphasises accessibility on foot or bike which in theory should lessen the amount of car journeys and therefore help climate change and residents’ health by walking more.

Although the idea of introducing the concept of “living locally” and the “20-minute neighbourhood” is quite an seductive theory, the reality is, in our opinion, not feasible in a predominantly rural/semi-rural area like ours.

Therefore, we think that it is both foolhardy and irresponsible to now potentially base the district’s whole spatial strategy for housing, over the next 15 years on an **unproven** highly experimental theory.



Table 5 The new settlement hierarchy rankings look like this:

Tier in Hierarchy	Names of Settlement
1	Alton, Liphook, Whitehill & Bordon,
2	Clanfield, Four Marks & South Medstead, Grayshott, Horndean
3	Bentley, Bentley Station, Bentworth, Catherington, Headley, Headley Down, Holt Pound, Holybourne, Kingsley, Lindford, Medstead, Passfield Common, Ropley, Ropley Dean, Rowlands Castle
4	Arford, Beech, Griggs Green, Lasham, Lower Froyle, Lovedean, Shalden, Upper Froyle, Upper Wield

We strongly believe that the proposed changes to the Settlement Hierarchy are inappropriate and would voice the following arguments:

- The new settlement hierarchy concept appears to be contrived as the new tier boundaries are uneven and too wide and the new scoring system, allocating less points, does not allow for differentiation between the medium sized settlements.
- It does not define what each tier means so individuals have no idea just how much development is considered appropriate for their settlement. The old hierarchy definitions are clearly stated in CP2.
- FM&M is described as an ‘anomaly’ in the new system, yet it is being ‘shoehorned’ into an upper tier unfairly. Further indication that this is contrived.
- FM&M and Horndean are considered to be of equal status i.e., same tier - when facilities are directly compared, they are not comparable at all, Horndean has many more, also Horndean has significantly more “linked” facilities and employment hubs than FM&M.
- 20-mins neighbourhoods whilst appealing do not fit into a rural location. Using actual walking data: the FM centre cannot be reached in the specified time from much of the southern part of Medstead and there are in places inclines of up to 110ft which when considering the future demographic changes (significantly more residents 65+) will make the walking times even longer and in some cases the distances will be unattainable.
- Most of the main daily activities (as defined by the Town and Country Planning Association - living, working, commerce, healthcare, education, and entertainment) do not take place within the 1,200m isochrome of the village, e.g., employment – very little in the villages, leisure – one restaurant, no pubs, cinema or leisure centre, education - no senior school and primary schools on the periphery, so again FM&M *cannot be described* as a 20-minute neighbourhood.
- The Settlement Hierarchy paper acknowledges that the so called 20-min neighbourhood is impractical and actually extends the concept to a 30-minute neighbourhood.
- We could find no evidence that 20-min or 30- min Neighbourhood idea has been successfully implemented in a village/rural/semi-rural area.
- The 30-minute round trip is calculated on the basis of ‘how the crow flies’. In FM&M this does not reflect the real timescales by a significant margin.



- We believe very strongly that FM&M should not be moved from a tier 3 to a tier 2 in the new system to reflect its true and accurate status.

## Conclusions

The old settlement hierarchy framework described FM&M accurately in terms of existing facilities and was able to distinguish settlements in a fair way that made sense. The new framework based on 20-minute neighbourhood principle, whilst seductive, applies a scoring system that suggests that Horndean with its myriad of facilities is equivalent to FM&M which is absurd. It also suggests that the community can walk to its facilities, there and back, within 30 minutes as the crow flies. This does not take into account the local topography i.e., typical gradients up to 110ft and the fitness of the individual. A significant 43.5% growth in the elderly population and a 30-minute uphill walk would be practically impossible for many.

The consequence of this new framework is that FM&M would be able to take even more housing which is a nonsense and assumes that residents can access work, schools, and recreation without the use of a car. This is not the case. It will just introduce even more cars which would **adversely affect climate change** and therefore contrary to what the 20-minute neighbourhood idea is trying to achieve. EDHC must prove that their assumptions are sound and reasonably practicable for the public they serve.

The residents of FM&M feel that EHDC are being sneaky and underhand in trying to change the hierarchy tiers. **This proposed change is very strongly opposed.**

## 20-minute Neighbourhood discussion

As stated above the idea of the 20-minute neighbourhood or “living locally” is a seductive one. However, with reference to the “20-minute Neighbourhoods” paper produced by the Town & Country Planning Association, this concept for rural areas is not at all convincingly described (in fact, it looks like their ideas are only now just emerging).

In addition, we **could not find any examples** where this strategy has been successfully implemented in village/rural/semi-rural locations.

This idea of “living locally” looks a good one, but it needs to be implemented **in the right places, typically towns and cities.**

SMASH conducted some STRAVA walking data and also carried out a local travel survey, both of which confirmed that Four Marks & Medstead are **NOT** 30-minute neighbourhoods.



See Appendix 1 for route details.

Route	<i>Approx. distance as the crow flies (metres)</i>	Actual walking distance (metres)	<b>% Underestimated</b>	<i>Time taken as the crow flies*</i> Mins secs	Actual time taken* Mins secs	<b>% Underestimated</b>
1 (orange)	500	1,303	160%	6m 15s	16m	160%
2 (yellow)	700	1,480	111%	8m 45s	18m 30s	117%
3 (blue)	700	1,448	107%	8m 45s	18m	113%
4 (green)	800	1,432	79%	10m	18m	80%
5 (black)	1,500	2,060	37%	18m 45s	26m	89%
6 (purple)	500	950	90%	6m 15s	12m	95%

As can be seen from the table above, the “as the crow flies” distances significantly underestimate the distances and times it actually takes a pedestrian to walk the various routes.

#### Summary of Travel Data

We collected data from 706 locally based adults and the results showed the following:

- 63% of people work.
- Of those, 70% work outside the village at some time during their working week.
- 78% of them drive >20 miles to their place of employment. If travel by car plus train is included, this figure rises to 93%.
- In addition, the primary mode of transport, whether visiting the local Four Marks shops or travelling outside Four Marks for shopping/other activities is overwhelmingly the car.

From these results, we see very limited opportunities to get people out of their cars to walk/cycle more in FM&M.



## Spatial Strategy Options - Where should houses be built? Important

The EHDC Local Plan Consultation survey suggests 4 options for spatial strategy – these are:

1. Disperse housing amongst all settlements but using a new Settlement Hierarchy framework
2. Expand larger settlements only using the existing Settlement Hierarchy framework
3. Distribute housing by population numbers
4. Build a standalone ‘garden village’ with all amenities close at hand
5. Suggest Alternative ideas.

We know that planning is complex, we feel to choose 1 out of the 4 categories above is too simplistic and is not optimal.

This is particularly the case as we do not have sufficient information about all the options. This is despite attending the public consultations when many of our questions were left unanswered.

We believe that housing should be built to meet specific needs not just to fulfil a number as Michael Gove has acknowledged.

HEDNA (2022) data suggests that in EH the primary future local need is going to be for those **aged 65+, and first-time buyers (and renters)**.

It would also suggest that to mitigate climate change then housing should be built near a place of work and near facilities which serve their community.

Our young people are more inclined to want to live in a town rather than a village like FM&M, because there is ready access to leisure facilities e.g., restaurants, cafes, sports centres, pubs, cinemas as well as more employment opportunities.

The HEDNA suggests that the type of housing required for EH will be for 1,2 or 3 bedroomed houses, or flats, not 4,5 bedroomed executive type homes. A significant proportion should be located in towns and larger settlements with good, varied facilities. This would also meet the needs of the older population as these locations tend to have better shopping and healthcare provision which is an important consideration for this group of individuals.

Building huge faceless estates of 600+ houses, which was previously driven by meeting numbers is no longer a justified strategy.

In FM&M, **78%** of working people drive 20+ miles to their place of employment (survey Appendix 2) and that to access local facilities near or outside FM&M they use a car.

This would suggest that FM&M do not require new development (having absorbed over 500 new houses over the last 9 years) and that any new housing that is built here would be for those that commute out of the village, thus very much contradicting EH’s aspirations around climate change.





## Spatial strategy league table

If East Hampshire were to put a league table together i.e., where to build, and had land available to do so, then taking into account the proposed new anticipated NPPF rules and housing need then it may look like this.

1. EHDC should proactively promote their registered Brownfield sites and use the incentive levy to ensure these sites are used first e.g., Penns place.
2. Investigate the possible use of EHDC owned parcels of land to build small developments of 1 to 2- bedroomed homes. <sup>1</sup>
3. Standalone self-sufficient, purpose built, (not village add-ons), Garden Village as envisaged by the Northbrook Park plan. This would impact the least number of existing communities, make efficient use of land and support climate policies more fully e.g., a *true* 20 min neighbourhood concept could be designed. May require compulsory purchase options.
4. Settlements that are defined as “Large service centres” - some building by diffusion not mass housing estates that overwhelm and change local character
5. Settlements defined as “Small service centres” - limited building based on local need only & existing facility infrastructure *capability*.
6. Settlement defined as Hamlets/small rural villages - minimum building focused on local need (affordable housing) and link to nearest minimum services.

In addition, there are over 400 properties that have been empty for 6 months or more in EH according to the Department for Levelling Up, Housing and Communities. Council policies should be put in place to attempt to bring these dwellings back into use which again would lower the requirement for building new houses in the district.

<sup>1</sup> Assumes using 2018 Settlement Hierarchy framework



## Appendices

### Appendix 1

#### Affordability Ratio Calculation

When the affordability ratio is calculated, it uses the median house price of £415,000 in EH and an individual income of £28,603.

We suggest for it to be a more realistic figure, a weighted average for income should be used and that the average market house value should be amended to just use the average local market house price for 1,2- & 3-bedroom properties (new householders generally do not buy 4- & 5-bedroom houses as their first property).

We would suggest a weighted average for income because, all these new households being formed are not all made up of one person households; in fact, we would suggest that 1 person households would be the minority, (although you may get some divorcees, of course) but we would suggest that the majority of new households would be made up of new working couples in their 20's or 30's renting or buying together for the first time. We're sure there must be data on this.

So, for the income part of the calculation, to make it more realistic, we should use a combined household income for a proportion of new households that contain 2 people. So, for 1 person, the earned income figure would be £28,603 and for 2 person households the household income figure would be £35,082 (The HEDNA states the combined household income of newly forming households is approximately 84% of the figure for all households (i.e., £41,764 x 0.84 = £35,082) and then use these figures in a weighted average.

So, for example if 25% of new households were made up of 1 person and 75% were made up of 2 persons, then it would be more appropriate to use a household income figure (with reference to the HEDNA) of £33,464

i.e.  $(£28,608 \times 0.25 \text{ [from 25\% single person household]}) + (£35,082 \times 0.75 \text{ [from 75\% 2 person households]}) = £33,464$

This would then make the affordability ratio not 14.51 but 12.4 and therefore giving an adjustment factor of 153% (not 166%) which then calculates to be an annual housing need of 583 (not 632), a reduction of 49 per year. See table below.



For the whole of EH District

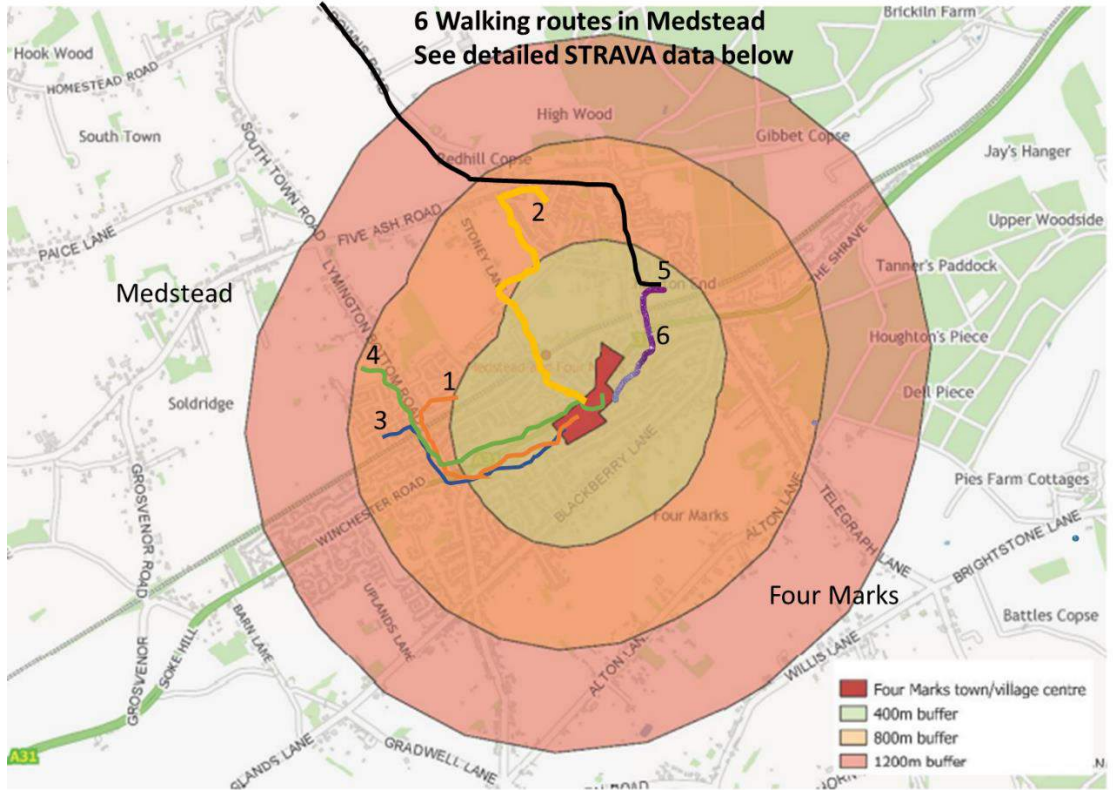
INCOME	AFFORDABILITY RATIO	ANNUAL HOUSING NUMBER
£28,603 for 1-person new household	14.51	632
£35,082 EXISTING for 2-person new household	11.82	514
£33,464 WEIGHTED (i.e., 25% 1 person & 75% 2-person household)	12.40	583

If then a more realistic figure is taken for the average local market house price for 1,2-,& 3-bedroom properties only, (omit 4+ bedroom dwellings) this again would reduce the uplift and make the ratio more representative of most of the new households being created in EH.



**Appendix 2**

**STRAVA Walking routes in Medstead**



Route Number	Route Description
1	Ivatt's Estate Medstead to Four Marks shops
2	Windsor Rise Medstead to Four Marks shops
3	Austen Fields Estate to Four Marks shops
4	Lymington Bottom Road (mid-way down) Medstead to Four Marks shops
5	Holland Drive Medstead to Four Marks shops
6	Holland Drive Medstead to Medstead Primary school

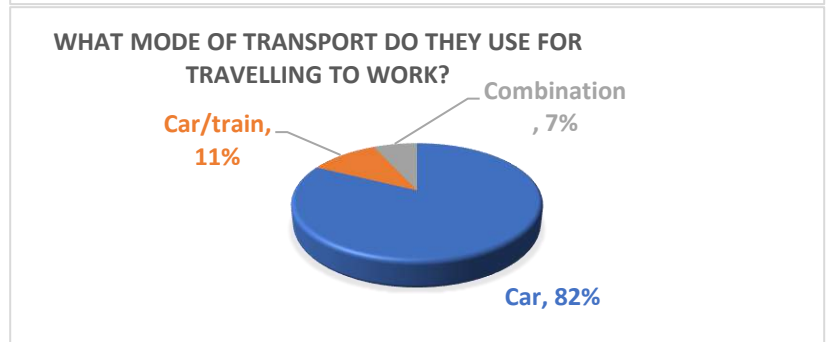
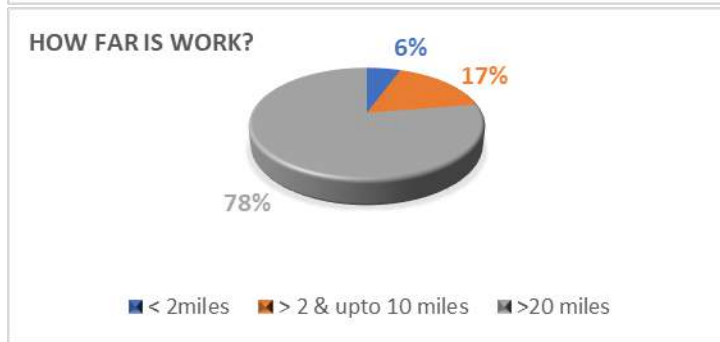
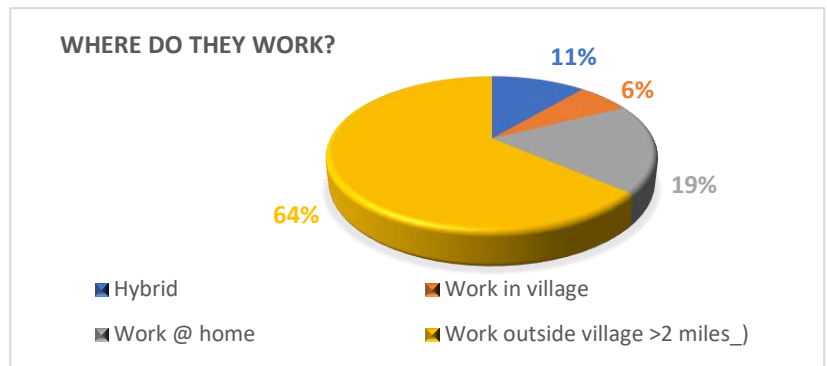
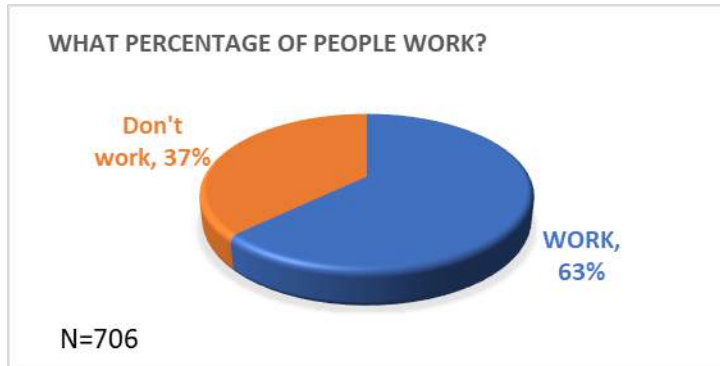


### Appendix 3

#### SMASH TRAVEL SURVEY

Conducted between 09/12/2022 till 04/01/2023 n=706 replies

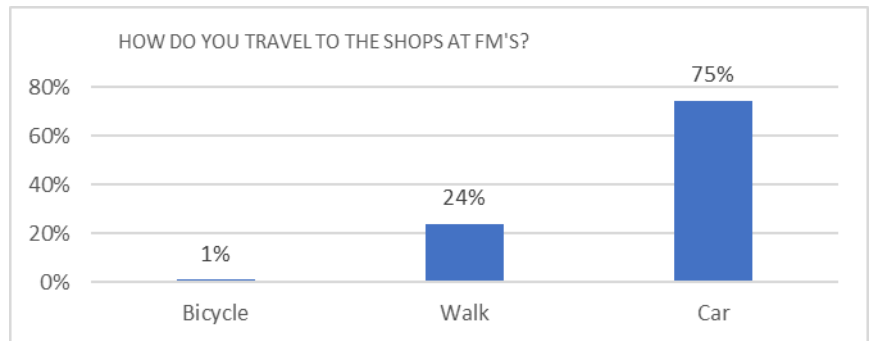
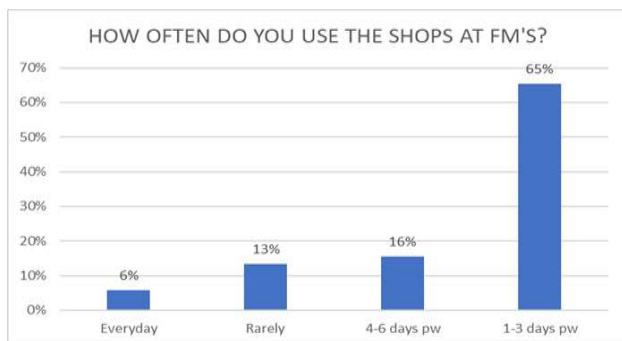
#### EMPLOYMENT

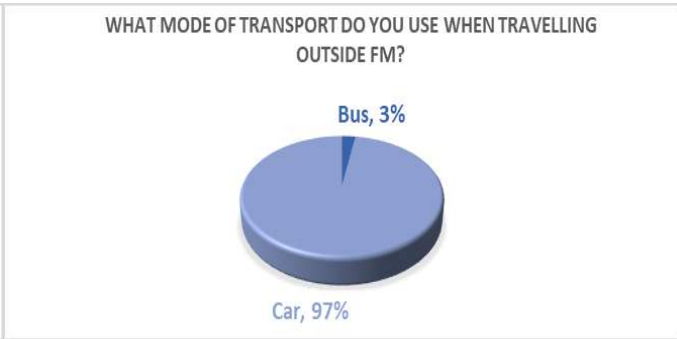
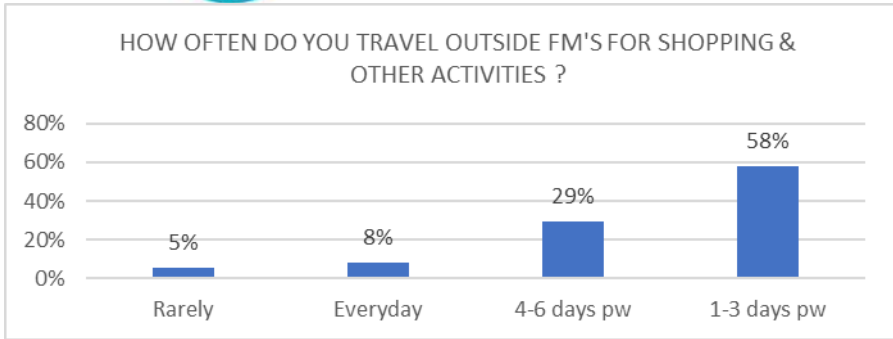


63% of people work, 75% work outside the village at some time of which 78% % drive >20 miles. Car+ train usage is 93%.

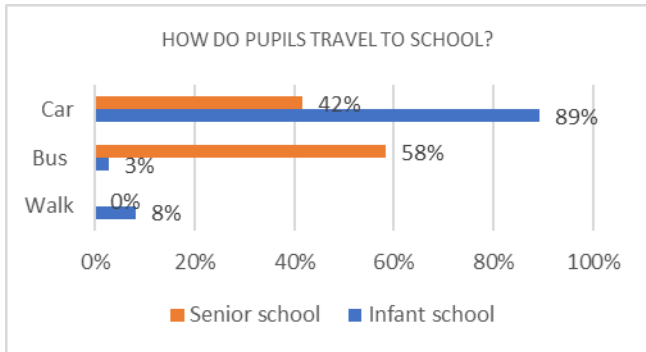
#### SHOPPING AND OTHER ACTIVITIES (e.g., leisure)

The primary mode of transport whether visiting local FM's shops or travelling outside FM's for shopping/other activities is overwhelmingly the car.





**EDUCATION**



Pupils attending the local primary school predominately use the car

Pupils attending the senior school (outside FM's) use a mixture of school bus and the car.

**CONCLUSION.**

This survey confirms that vehicle usage for the residents of Four Marks and Medstead is an essential part of living here. These results are expected for rural/semi-rural communities.



## Appendix 4

### **Freeth's solicitors summary of Michael Gove's proposals of 5<sup>th</sup> December 2022.**

This outlines some important and far-reaching potential changes to the National Planning Policy Framework (NPPF). It has massive implications for the future of planning decision-making in the UK.

We also believe that it will give EHDC more freedom than they have had now to drive their future planning decisions, take into account the constraint issues that the SDNP brings, challenge the overall future housing numbers, and engage more fully with local communities.

In summary:

- Removal of the requirement for EHDC to continually demonstrate a deliverable five-year housing land supply, providing its housing requirement in its strategic policies is less than five years old.
- Changes to the tests of soundness for plan-making. Specifically, removal of the 'justified' test and amendments to the 'positively prepared' test. EHDC only need to meet objectively assessed needs 'so far as possible' and removing requirement to satisfy unmet need from neighbouring authorities.
- Guidance on duty to co-operate remains unchanged. This is expected to be the subject of change in the future via an "alignment policy" which will be the subject of future consultation.
- Confirmation that the standard methodology is an advisory starting point for establishing a housing requirement and that the methodology incorporates an uplift for the top 20 cities/urban not rural areas. This uplift should be accommodated within cities/urban centres prioritising brownfield/under-utilised urban sites.
- When establishing housing need, reference to older people is proposed to be widened to include retirement housing, housing with care and care homes.
- Past over-delivery can be deducted from the housing requirement figure in a new plan and there is explicit reference that building at densities significantly out of character with an existing area may be justification for not meeting full assessed needs.
- Boosting the status of Neighbourhood Plans by strengthening their protection against paragraph 11d arguments ("the tilted balance") by removing any test against housing supply or delivery and extending the development plan protection period from 2 to 5 years, in the test of whether adverse impacts are likely to significantly and demonstrably outweigh the benefits of development.
- Reference to approving extended duration of existing renewable development where its impacts are or can be made acceptable and significant weight to energy efficiency improvements to existing buildings.



- Regular additional referencing to supporting ‘beauty’ in design and placemaking and stronger emphasis on local design codes.
- Transition arrangements for both plan making and decision making. The revised tests of soundness only apply to plans that have not reached Regulation 19 stage or reach that stage within three months of the revised NPPF. Any LPAs which have been subject to a Regulation 18 or 19 consultation for plan making will only need to demonstrate four years of housing supply for a period of up to two years. A timeline for the transition to the reformed plan-making system is proposed following anticipated Royal Assent of the Bill.
- Outside of specific changes to the NPPF, the consultation also proposes whether ‘past irresponsible planning behaviour’ should be a material consideration. There is no definition of what such behaviour entails. It is however identified that the options for considering such behaviour do need to be the subject of further engagement with local planning authorities, the development sector, and other stakeholders to ensure fairness. This also requires primary legislation.
- The consultation also sets out the justification and scope for National Development Management Policies which will be subject to a separate consultation, along with financial penalties for developers who are building out too slowly.
- The proposed revisions to the NPPF are in advance of a ‘fuller’ review of the Framework, dependent on the implementation of the Government’s proposals for wider change to the planning system, including the Levelling-up and Regeneration Bill.

*Reference* Freeth’s solicitors document ‘Planning Freethinking January 2023: NPPF Revisions Consultation,





## Appendix 5

### Michael Gove's relevant quotes from his letter of 5<sup>th</sup> December 2022

'First, while I will retain a method for calculating local housing need figures, I will consult on changes. I recognise that there is no truly 'objective' way of calculating how many homes are needed in an area, but I do believe that the plan-making process for housing has to start with a number. This number should, however, be an advisory starting point, a guide that is not mandatory.'

'I will instruct the Planning Inspectorate that they should no longer override sensible local decision making, which is sensitive to and reflects local constraints and concerns. Overall, this amounts to a rebalancing of the relationship between local councils and the Planning Inspectorate and will give local communities a greater say in what is built in their neighbourhood. For example, when assessing a local plan, the following will have to be taken into account:

- Genuine constraints: local planning authorities will be able to plan for fewer houses if building is constrained by important factors such as national parks, heritage restrictions, and areas of high flood risk.
- Character: local authorities will not be expected to build developments at densities that would be wholly out of character with existing areas, or which would lead to a significant change of character'

'I will also review how the 'soundness' test for reviewing plans at examination is operated by the Planning Inspectorate. I will ensure that plans no longer have to be 'justified,' meaning that there will be a lower bar for assessment, and authorities will no longer have to provide disproportionate amounts of evidence to argue their case.'

'Inspectors will be required to take a more reasonable approach to authorities that have come forward with plans that take account of the concerns of the local community, by taking a more pragmatic approach at examination which fully reflects this updated policy. For those areas that would like to bring forward their own method for assessing housing needs, I will be clear on the exceptional circumstances under which they may do so, for example where a case can be made for unusual demographic and geographic factors. This will be made clear in an updated National Planning Policy Framework and guidance to the Planning Inspector.'

'I want to change the system on the rolling five-year land supply. We will end the obligation on local authorities to maintain a rolling five-year supply of land for housing where their plans are up-to-date. Therefore, for authorities with a local plan, or where authorities are benefitting from transitional arrangements, the presumption in favour of sustainable development and the 'tilted balance' will typically, not apply in relation to issues affecting land supply.'

'I want to recognise that some areas have historically overdelivered on housing - but they are not rewarded for this. My plan will therefore allow local planning authorities to take this into account when preparing a new local plan, lowering the number of houses they need to plan for.'



'Places with existing plans will benefit from the changes above, as they will be free of five-year land supply obligations provided that plan is up to date. However, I am aware that those with local plans at an advanced stage of preparation will not benefit from these changes so I will also put in place transitional arrangements. Where authorities are well-advanced in producing a new plan, but the constraints which I have outlined mean that the amount of land to be released needs to be reassessed, I will give those places a two-year period to revise their plan against the changes we propose and to get it adopted. And while they are doing this, we will also make sure that these places are less at risk from speculative development, by reducing the amount of land which they need to show is available on a rolling basis (from the current five years to four).'

'Communities will have a much more powerful incentive to get involved in drawing up local plans. They can protect the important landscapes they cherish, direct homes to the places they want and adopt design codes to secure the houses they want to see. Once a plan is in place, these changes mean that they will no longer be exposed to speculative developments on which they have less of a say.

I will increase community protections afforded by a neighbourhood plan against developer appeals – increasing those protections from two years to five years. The power of local and neighbourhood plans will be enhanced by the Bill; and this will be underpinned further through this commitment. Adopting a plan will be the best form of community action - and protection. Furthermore, we will clarify and consult on what areas we propose to be in scope of the new National Development Management Policies, and we will consult on each new Policy before it is brought forward by the Government. National Development Management Policies will also not constrain the ability of local areas to set policies on specific local issues.'

'We need to hold developers to account so that desperately needed new homes are built, and I already have a significant package of measures in the Bill to do this, including public reporting and declining new planning applications on a site if developers are failing to build out. I will consult on two further measures:

- i) on allowing local planning authorities to refuse planning applications from developers who have built slowly in the past; and
- ii) on making sure that local authorities who permission land are not punished under the housing delivery test when it is developers who are not building.'

'I have heard and seen examples of how the planning system is undermined by irresponsible developers and landowners who persistently ignore planning rules and fail to deliver their legal commitments to the community. That is wrong, and to make it worse, this behaviour is then ignored if they seek planning permission again. I therefore propose to consult on the best way of addressing this issue, including looking at a similar approach to tackling the slow build out of permissions, where we will give local authorities the power to stop developers getting permissions'

'The Government is investing to incentivise and enable **brownfield development**. Homes England, our housing delivery arm, is spending millions on acquiring sites in urban areas to regenerate for new housing. We are also allocating over £800m to mayoral and local authorities to unlock over 60,000 new homes on brownfield land, as part of our wider brownfield and infrastructure funding package. The new Infrastructure Levy will be set locally by local planning authorities. They will be able to set different Levy



rates in different areas, for example lower rates on brownfield over greenfield to increase the potential for brownfield development.'

'As the Prime Minister committed to in the summer, we will also continue to get cities building more new houses, and stop them offloading their responsibilities to provide new housing onto neighbouring green fields by ending the so-called 'duty to co-operate' which has made it easier for urban authorities to impose their housing on suburban and rural communities.'

'No planning reforms will ever be perfect, but I judge that the Bill, alongside the broader policy changes that I am proposing above, will leave us with a significantly improved planning system than the status quo. These reforms will help to deliver enough of the right homes in the right places and will do that by promoting development that is beautiful, that comes with the right infrastructure, that is done democratically with local communities rather than to them, that protects and improves our environment, and that leaves us with better neighbourhoods than before.'



## References

EHDC climate change and sustainability construction supplementary planning documents

Technical note: testing the standard method housing need for East Hampshire

EHDC housing and economic needs assessment (HEDNA) 2022

EHDC gypsy and traveller accommodation assessment 2020

EHDC biodiversity and planning guidance 2021

EHDC Landscape capacity study 2018

EHDC green infrastructure strategy 2019

EHDC local developments scheme 2022

Habitats Regulations Assessments Screening 2022

Sustainability Appraisal - Interim Scoping Report 2018

EHDC Housing Needs and requirement background paper

EHDC Settlement Hierarchy background paper

EHDC Spatial development options background paper

5 Dec 2022 DLUHC SoS to all MPs - Planning and LURB 051222 from Michael Gove

Freeth's solicitors document 'Planning Freethinking January 2023: NPPF Revisions Consultation'

## **Response to the Settlement Hierarchy Background Paper from SMASH**

**December 2022**

**SMASH (Stand with Medstead Against Speculative Housing) would like to voice its grave concerns and strong opposition to the revised settlement hierarchy paper that is being proposed for East Hampshire and in particular the fact that Four Marks & Medstead (FM&M) would be moved from a Tier 3 settlement to a Tier 2 settlement.**

**This proposed change will potentially open up our 2 villages to considerably more new housing on top of the huge amount that we have already seen over the last 9 years (in excess of 500). We say this because your “Housing Needs & Requirements” paper states:**

***“At the second stage of this Regulation 18 consultation exercise, we will identify a supply of land to meet the housing requirements over the plan period, having regard to the proposed spatial strategy and the settlement hierarchy.”***

Although the idea of introducing the concept of “living locally” and the “20-minute neighbourhood” is quite an appealing theory, the reality is, in our opinion, not feasible in a predominantly rural/semi-rural area like ours.

We of course can see the advantages to the idea of living locally (particularly in towns and cities) to hopefully reduce the number of car journeys that individuals might make and therefore have a positive impact both on climate change associated with transport emissions and on personal health from walking more.

However, with reference to the “20-minute Neighbourhoods” paper produced by the Town & Country Planning Association, this concept for more rural areas is not at all convincingly described (in fact, it looks like their ideas are only now just emerging).

In addition, we could not find any examples where this strategy has been successfully implemented in village/rural locations.

Therefore, in our opinion, it is both foolhardy and irresponsible to now base the district’s whole spatial strategy over the next 15 years on an unproven theory.

Additionally, we have several points that we would like to discuss further:

- **Distances to local facilities**
- **Tier boundaries & comparison with Horndean**
- **Local car usage as described in Travel Survey December 2022**
- **Four Marks & Medstead as an exception**
- **Extract from Planning Inspectors report (Mar 2018) on the Mid Sussex District Plan**
- **Current impact of the “living local” strategy on new housing applications in Medstead**

## Distances to local facilities

The revised hierarchy document that is being proposed has now changed the definition of “accessibility”. Previously to walk:

- 400m was deemed to be good accessibility
- 800m was deemed to be fair accessibility
- Greater than 800m was deemed to be poor accessibility

Now 1,200m has been introduced as the acceptable key distance, via the 20-minute neighbourhood idea. This is a significant change. In addition, these distances are considered “as the crow flies”. As Medstead doesn’t have many crows, we collected some human data. (see Attachment 1 for routes and STRAVA walking data).

Some typical routes from various locations to the local centre are shown, plus one walking to the local school.

As you can see and as would be expected, all the examples show that the actual walking distances for each route are **significantly greater** than indicated by the “as the crow flies” distances and as a result it takes much longer to walk these routes. Additionally, there are some significant inclines (of approx. 60 to 110 ft) which should be taken into account particularly as the future demographic of East Hampshire shows an increase of 43% in the over 65 age group.

It is also worth noting that walking along the busy A31 to get to the local shops is unpleasant and at times unnerving as in places the footpaths are narrow and the traffic passes very close. The smell of the traffic fumes, particularly at rush hour, is also unpleasant and is surely detrimental to health.

The table below indicates how much further and how much longer it actually takes to walk different routes compared to “as the crow flies” data (both calculated on a walking speed of 3mph\*). Attachment A shows the detail of each route taken and the raw data.

Route	<i>Approx. distance as the crow flies (metres)</i>	Actual walking distance (metres)	Difference in distances (metres)	<i>Time taken as the crow flies* Mins secs</i>	Actual time taken*	Difference in times Mins secs
1 (orange)	500	1,303	803	6m 15s	16m	9m 45s
2 (yellow)	700	1,480	780	8m 45s	18m 30s	9m 45s
3 (blue)	700	1,448	748	8m 45s	18m	9m 15s
4 (green)	800	1,432	632	10m	18m	8m
5 (black)	1,500	2,060	560	18m 45s	26m	7m 15s
6 (purple)	500	950	450	6m 15s	12m	7m 45s

**As can be seen from the table above, the “as the crow flies” distances significantly underestimate the actual distances and times it actually takes to walk the various routes.**

Many locations in the southern part of Medstead that your model suggests are within 400m, 800m, or 1,200m, are not within these ranges at all, when you take into account the routes you have to take, thus we would say that the “as the crow flies” measurements are totally misleading and therefore are not fit for purpose and should not be used as the basis of this concept. This data also indicates that overall, FM&M should not be considered a 20-minute neighbourhood.

### **Tier boundaries & comparison with Horndean**

Another change that has been introduced in the proposed revision of the hierarchy document concerns the scoring system and the numerical values of the tier boundaries.

Considering the settlement scoring, we, as individuals, have no comprehensive knowledge about what actual facilities/services each settlement has and therefore can only assume that they are predominantly accurate. However, because less points are now available for each facility/service there is less ability to differentiate between settlements whose scores are now more closely bunched than before. We see two issues here:

- The revised tier boundaries only exacerbate the issue of poor differentiation as they are now uneven and too wide. We would suggest a more equitable definition as:

<b>Tier 1: 31 – 40</b>	<i>Your tiers</i>	<b><i>Tier 1: 30 - 40</i></b>
<b>Tier 2: 21 – 30</b>		<b><i>Tier 2: 15 - 29</i></b>
<b>Tier 3: 11 – 20</b>		<b><i>Tier 3: 1 - 14</i></b>
<b>Tier 4: 1 – 10</b>		<b><i>Tier 4: 0</i></b>
<b>Tier 5: 0</b>		

It looks like you have scored the settlements first, then subsequently decided on the tier boundaries (to fit the results), instead of setting the tier boundaries first, then populating the settlements into the appropriate evenly spaced tiers from their scores!

- It is proposed that FM&M will now be pushed up the hierarchy into the same tier as Horndean, which in our opinion is totally inappropriate. (see Attachment 2). They have many more facilities/services and numerous “linked” journeys can be made within their 1,200m walking isochrone. They are also much better connected to other towns & villages by public transport, (i.e. more bus services and more destinations) and their local employment opportunities are vastly greater. If the suggested tier boundaries above were used, then FM&M would then be in the tier below Horndean, which we would argue is the more appropriate and therefore correct classification.

### **Local car usage as described in Travel Survey December 2022**

Over the last 9 years there have been in excess of 500 urban style houses built in FM&M (with planning approval for another 54 recently granted).

On several occasions your planning officers have commented in their planning reports that the *local* need for housing in FM&M has already been met and therefore these new builds just bring in more people from outside the area. These newcomers do not work in the village (as there is a very limited numbers of jobs available here), they commute out, predominantly by car, which then reinforces the local status of being a “commute out village”. All these extra cars on what are essentially semi-rural roads (many in Medstead don’t even have pavements) make walking both unpleasant and unsafe.

To support this “commute out” statement we have recently (December 2022) conducted a travel survey within the area (see attachment 3 for further detail).

We collected data from 706 locally based adults and the results showed the following:

- **63% of people work.**
- **Of those, 70% work outside the village at some time during their working week.**
- **78% of them drive >20 miles to their place of employment. If travel by car plus train is included, this figure rises to 93%.**
- **In addition, the primary mode of transport, whether visiting the local Four Marks shops or travelling outside Four Marks for shopping/other activities is overwhelmingly the car.**

***From these results, we see very limited opportunities to get people out of their cars to walk/cycle more.***

By moving FM&M up the hierarchy, suggesting these villages are somehow now more sustainable and therefore suitable for more housing development than previously is absolutely ludicrous.

As the travel data shows, this revised position will just introduce even more vehicles on the village roads as the new residents “commute-out” for their employment (plus for major shopping and leisure activities). How is this helping climate change?

To us this just reinforces the fact that we are not a 20-minute neighbourhood as so many of people’s day-to-day needs are not close enough to walk to, FM&M are therefore not very sustainable villages.

#### **Four Marks & Medstead as an exception**

Another aspect of the revised hierarchy document that we are concerned about is your admission that FM&M doesn’t actually fit the 20-minute neighbourhood model anyway but you then spent half a page explaining, then justifying its inclusion by making it an exception to the methodology. This seems contrived and disingenuous.

**Extract from Planning Inspectors report (Mar 2018) on the Mid Sussex District Plan**



In the hierarchy background paper itself and in [REDACTED] correspondence to our group (see below), then it is understood that the Council's intention is not to name or explain what each tier is/means.

We asked:

*What are the definitions now for the revised tiers? – it was all clear previously (in CP2) (of the Joint Core Strategy) and now it is absolutely unclear”*

We received the following reply:

*There are no prescriptive names given to the tiers within the settlement hierarchy which is intentional to avoid observers reading too much into a title and more specifically the variety of settlements in East Hampshire do not allow for easy categorisation in terms of town/village etc.*

Again, we believe this is an unacceptable position to take as it gives no guidance whatsoever about what level of new house building might be appropriate in each different tier.

We would like to quote from a Planning Inspectorate Report ([REDACTED] – 12 Mar 2018) who reviewed the Mid Sussex District Plan. He says:

*The settlement hierarchy.*

*Policy DP6 in the submitted plan included a settlement hierarchy with 5 categories; this is the broad spatial distribution referred to in paragraph 30 above, which MM04 brings under Policy DP5. This hierarchy is a satisfactory reflection of the scale and range of facilities in each of the settlements, but it does not provide sufficient guidance on the numerical distribution of housing. My Interim Conclusions (Document ID11) indicated that the absence of such Mid Sussex District Plan 2014-2031, Inspector's Report March 2018 10 guidance was unsound, because it would not provide strategic direction for the Site Allocations DPD, neighbourhood plans, or for development management. There was a significant risk that unbalanced growth could take place in inappropriate locations or that growth in sustainable locations could be suppressed.*

Based on the above, we would argue that Tier **DEFINITIONS (not tier names, this isn't important)** should be published **NOW** along the lines of those in CP2 of the current JCS, in order that residents can understand just what it means for their settlement to be in a particular tier. Moreover, if a settlement is to be moved up a tier, as is being proposed for FM&M, then what are the consequences of this? Residents need to know!

### **Current impact of the “living local” strategy on new housing applications in Medstead**

On December 21<sup>st</sup> December 2022, a planning application for 45 houses in Medstead was approved by the EHDC Planning Committee. This application (which started in 2018) had been refused twice already by your officers and refused at appeal.

Although, we do understand that by the Council no-longer having a 5-year land supply, then this tilts the planning balance, such that approval would **potentially** be more likely, (even

though nothing had changed in the application, it still didn't meet all the relevant planning policies!).

However, there is no doubt that the removal of the Hampshire Highways objection to the latest iteration of the application was also a key determining factor towards the approval.

They did a complete U-turn, siting their EMERGING (not approved and implemented) Local Transport Plan 4, which advocates the "living local" strategy which is to prioritise pedestrian and cycle movements over vehicular capacity schemes to encourage "modal shift" away from the use of the private car.

Their changed stance now basically said that the additional vehicles generated by the development would no longer have a severe cumulative impact on the surrounding highway network, contrary to NPPF 111 – **which was their original objection**, because they were to receive a developer's payment of £232,760, towards some, as yet, unspecified improvements to the walking/cycling provision in the area.

How does this payment now "negate" the effect of the additional traffic, when this development will generate approximately 100 extra cars on the Boyneswood Road/A31 junction, which both parties agree is already above its theoretical capacity.

In reality, it will just mean more cars on our village roads as that is what our Transport Survey has shown. The new residents of these houses will be from outside the area, who will continue to commute out of the village to their places of employment/leisure/weekly shop etc.

The extra cars will compromise the health, safety and well-being of all pedestrians in the area and make it less conducive to walking and contrary to the aims of their policy!

Again, on paper, this idea of "living locally" looks a good one, but it needs to be implemented **in the right places**, but Four Marks & Medstead (plus other similar settlements in EH) are not the right places. Here, it just equates to MORE HOUSES = MORE CARS on the local roads.

In summary,

- There is no sound evidence to support the idea that "20-minute neighbourhoods" can be successfully implemented in rural/semi-rural locations, so to base a 15-year spatial strategy around it seems foolhardy.
- From the Strava data included, the "as the crow flies" distances significantly underestimate the actual distances that pedestrians have to walk to get to the local centre or schools. Therefore, much of the village does not meet your 20-minute neighbourhood criteria. In addition significant inclines should be taken into account particularly with the future aging population. (see attachment 1 for walking data)
- By proposing to change the tier boundaries in the Hierarchy Paper, to some uneven distribution and change the scoring, FM&M will be pushed up the hierarchy into the same tier as Horndean, which has significantly more "linked" facilities and

employment. We would vehemently argue that this new classification is incorrect (see attachment 2 for facilities/services of the two settlements).

- Recent travel surveys indicate that FM&M are very car dependent villages, therefore introducing significant numbers of new houses (on top of the hundreds that we have already absorbed) will adversely affect climate change and the safety and wellbeing of all pedestrians. (see attachment 3 for travel data)
- You admit that FM&M doesn't actually fit the criteria for a 20-minute neighbourhood, but then go on to justify including it. This feels wrong.
- By not defining the meaning of each tier and indicating a rough idea of how many houses that this might translate into (see CP2 & CP10 of JCS), individuals are given no indication of what level of development might be expected in their settlement. This was found to be an unsound position by the Planning Inspectorate when the Mid Sussex District Plan was scrutinised. This should be made clear NOW. As the proposal is to move FM&M up a tier, which implies that we are now more sustainable and potentially can take even more new houses (on top of the huge number that have been built here over the last 10 years) we therefore suspect that this change will have a significant impact on the look and character of our two villages.
- The idea of "living locally" as described in Hampshire County Council's Emerging Transport Plan 4 is already impacting house planning decisions in the village. The latest approval of another 45 houses in Medstead will adversely affect the residents of FM&M, as more traffic will be introduced as many of the facilities/employment/schools/leisure are outside an acceptable walking distance for many.

We thank you for giving our group the opportunity to comment on the above document. If you have any further questions or require clarification of any of our points, then please contact us at <https://www.smashonline.co.uk>

Kind regards

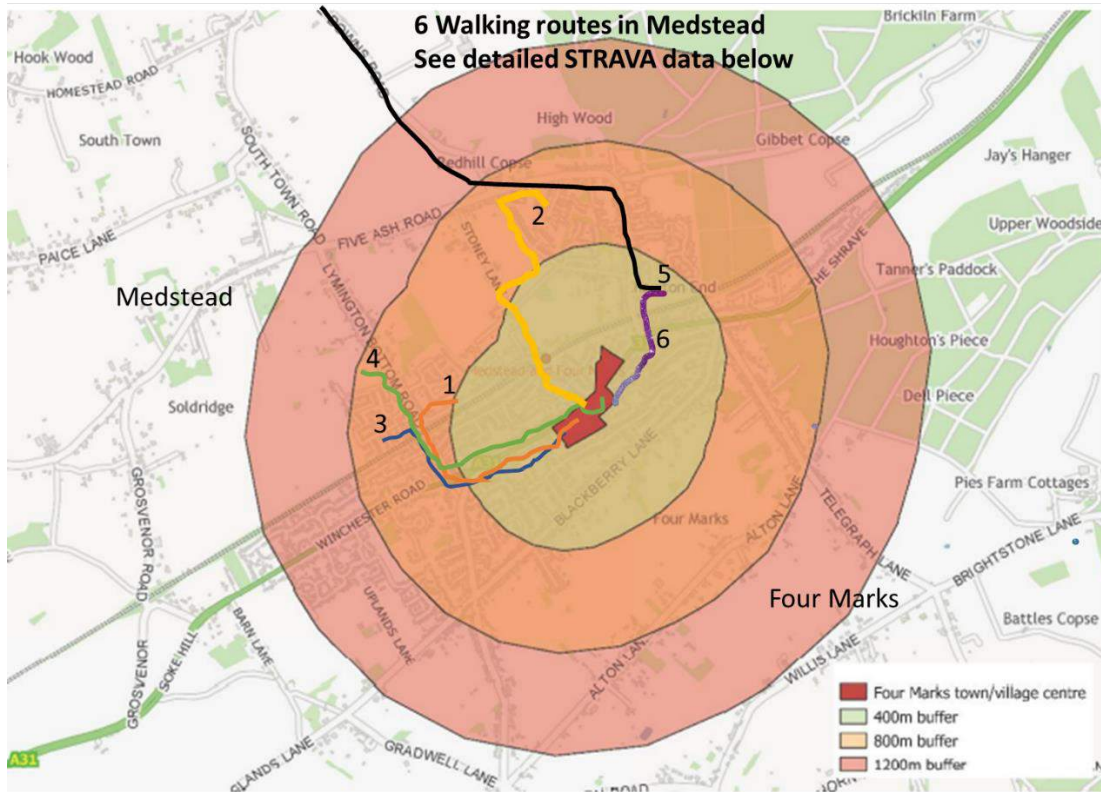
SMASH

(Stand with **Medstead Against Speculative Housing**)

Our Aim is to KEEP MEDSTEAD RURAL

# ATTACHMENT 1

## ROUTES



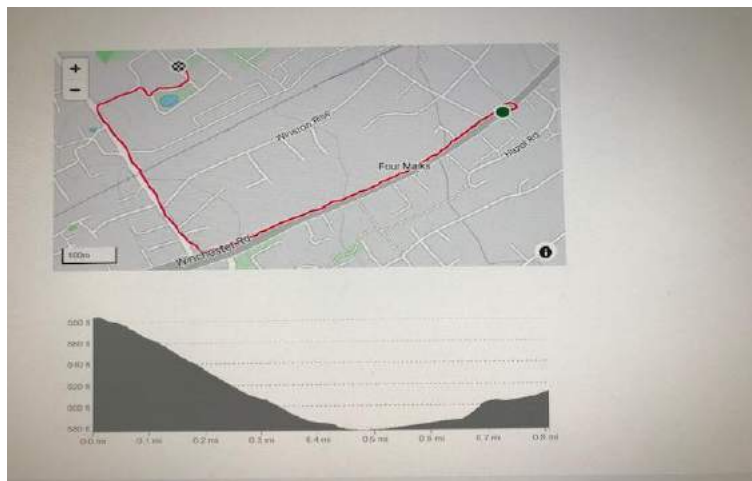
## STRAVA DATA

### Four Marks/A31 shops to Ivatts Estate, Medstead (Route 1)

[https://www.strava.com/activities/8223614568?share\\_sig=85335A241670516054&utm\\_medium=social&utm\\_source=ios\\_share](https://www.strava.com/activities/8223614568?share_sig=85335A241670516054&utm_medium=social&utm_source=ios_share)

Distance (miles)	Distance (metres)	Approx. distance as crow flies (m)	Actual time taken	Actual walking speed mph	Incline (ft)
0.81	1,303	500	15m 10s	3.2	100

If average speed of 3.0mph used it would take 16 minutes

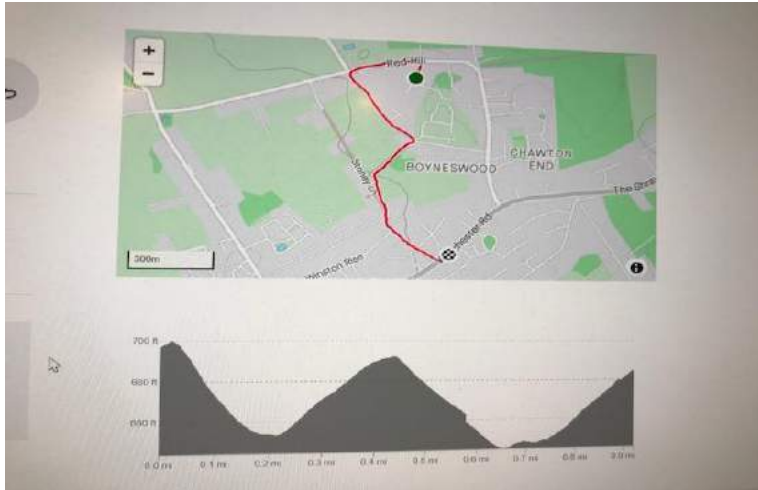


### Windsor Drive Medstead to Four Marks/A31 shops (Route 2)

[https://www.strava.com/activities/8223543317?share\\_sig=89A1B64D1670516093&utm\\_medium=social&utm\\_source=ios\\_share](https://www.strava.com/activities/8223543317?share_sig=89A1B64D1670516093&utm_medium=social&utm_source=ios_share)

Distance (miles)	Distance (metres)	Approx. distance as crow flies (m)	Actual time taken	Actual walking speed mph	Incline (ft)
0.92	1,481	700	17m 0s	3.26	60

If average speed of 3.0mph used it would take 18m 30s

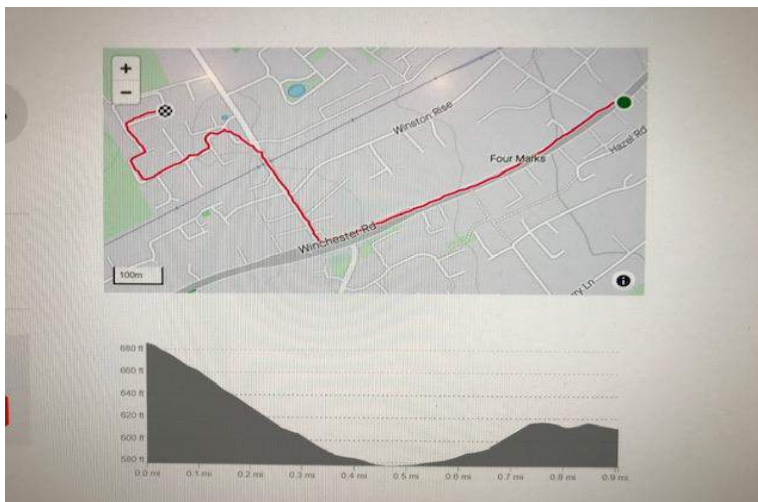


### Four Marks/A31 shops to Austen Fields estate, Medstead (Route 3)

[https://www.strava.com/activities/8193901621?share\\_sig=AB749D431670540248&utm\\_medium=social&utm\\_source=ios\\_share](https://www.strava.com/activities/8193901621?share_sig=AB749D431670540248&utm_medium=social&utm_source=ios_share)

Distance (miles)	Distance (metres)	Approx. distance as crow flies (m)	Actual time taken	Actual walking speed mph	Incline (ft)
0.9	1,448	700	15m 10s	3.6	100

If average speed of 3.0mph used it would take 18 minutes



**WKL – Lymington Bottom Road, Medstead to Co-op A31 (via Winston Rise) (Route 4)**

[https://www.strava.com/activities/8325667579?share\\_sig=10771DAB1672670201&utm\\_medium=social&utm\\_source=ios\\_share](https://www.strava.com/activities/8325667579?share_sig=10771DAB1672670201&utm_medium=social&utm_source=ios_share)

Distance (miles)	Distance (metres)	Approx. distance as crow flies (m)	Actual time taken	Actual walking speed mph	Incline (ft)
0.89	1,432	800	16m 29s	3.2	110

If average speed of 3.0mph used it would take 18 minutes

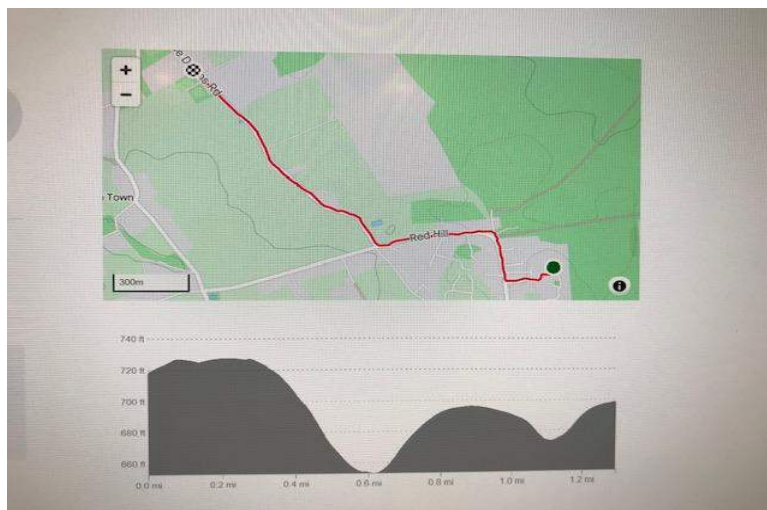


**Holland Drive, Medstead to Medstead School (Route 5)**

[https://www.strava.com/activities/8281668143?share\\_sig=7D14288F1671824824&utm\\_medium=social&utm\\_source=ios\\_share](https://www.strava.com/activities/8281668143?share_sig=7D14288F1671824824&utm_medium=social&utm_source=ios_share)

Distance (miles)	Distance (metres)	Approx. distance as crow flies (m)	Actual time taken	Actual walking speed mph	Incline (ft)
1.28	2,060	1,500	23m 4s	3.37	70

If average speed of 3.0mph used it would take 26 minutes

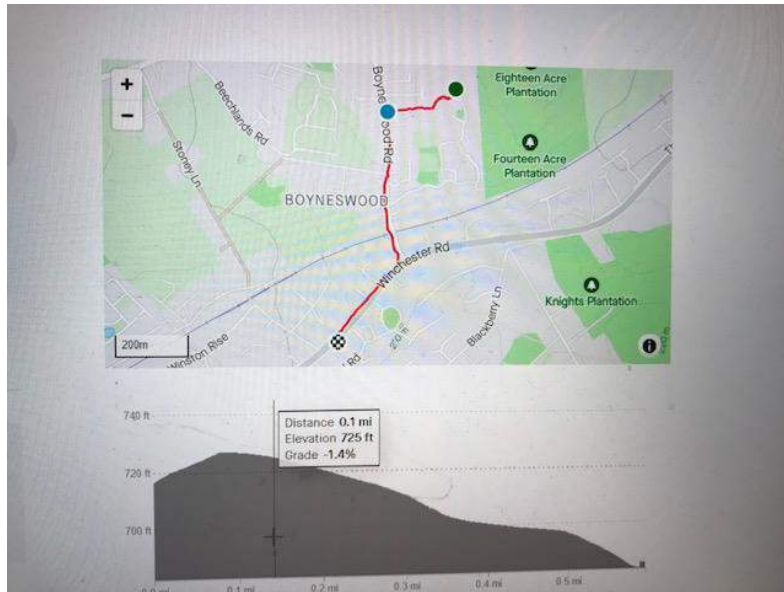


### Holland Drive/Friars Oak to Tesco/A31 (Route 6)

[https://www.strava.com/activities/8193222520?share\\_sig=5FA3A1C81672947316&utm\\_medium=social&utm\\_source=ios\\_share](https://www.strava.com/activities/8193222520?share_sig=5FA3A1C81672947316&utm_medium=social&utm_source=ios_share)

Actual Distance (miles)	Actual Distance (metres)	Approx. distance as crow flies (m)	Actual time taken	Actual walking speed mph	Incline (ft)
0.59	950	500	10m 19s	3.43	45

If average speed of 3.0mph used it would take 12 minutes



## ATTACHMENT 2

### Community facilities, retail provision, bus services & employment hubs

Apart from Four Marks & Medstead having two GP's surgeries and Horndean only having one, the majority of facilities are significantly more in Horndean.

Facility	Parish of Four Marks & Southern part of Medstead	Parish of Horndean
<b>Meeting Places</b>	Four Marks Village Hall	Jubilee Hall
		Napier Hall
		Centre Point at Horndean
		Merchistoun Hall
		Barton Hall
		Blendworth Church Centre
		Horndean Scout Hut
		Lovedean Village Hall
		Catherington Village Hall
		All Saints Church Hall
<b>Places of Worship</b>	Jubilee Church	Kingdom Hall of Jehovah's Witnesses
	Gospel Hall	Plymouth Brethren Christian Church
	Good Shepherd C of E Church	All Saints Church
		Horndean Baptist Church
		St Edmunds Church Hall
		Lovedean Bethseda Mission
<b>Pubs</b>	NONE	The Farmers Inn
		Red Lion Table
		The Ship and Bell
<b>GP's</b>	Boundaries Surgery	Horndean Surgery
	Mansfield Park Surgery	
<b>Opticians</b>	Matheson Optometrists	South Coast Opticians Ltd
<b>Pharmacies</b>	Four Marks Pharmacy	Everetts Pharmacy

When considering the retail offering of the 2 settlements - your own EHDC retail study, in 2018, showed that Horndean had a convenience goods turnover of **£25.99M**, whilst FM&M had **£4.99M** - again NO comparison.



## Bus provision

Location	Bus No.	Destinations & frequency
Four Marks & Medstead	64	Alton, Four Marks, Alresford, Winchester (every 30 mins)
Horndean	8	Portsmouth, Cosham, Waterlooville, Horndean, Clanfield (every 20 mins)
	36	Waterlooville, Horndean, Clanfield (runs until mid afternoon)
	37	Havant, Waterlooville, Horndean, Clanfield, Petersfield (runs every 30 mins, then hourly)
	37X & 637	Cowplain, Horndean, Clanfield, Petersfield, Alton and Purbrook, Waterlooville, Horndean, Clanfield, Petersfield (Limited service, 1 or 2 buses a day)

## Employment locations

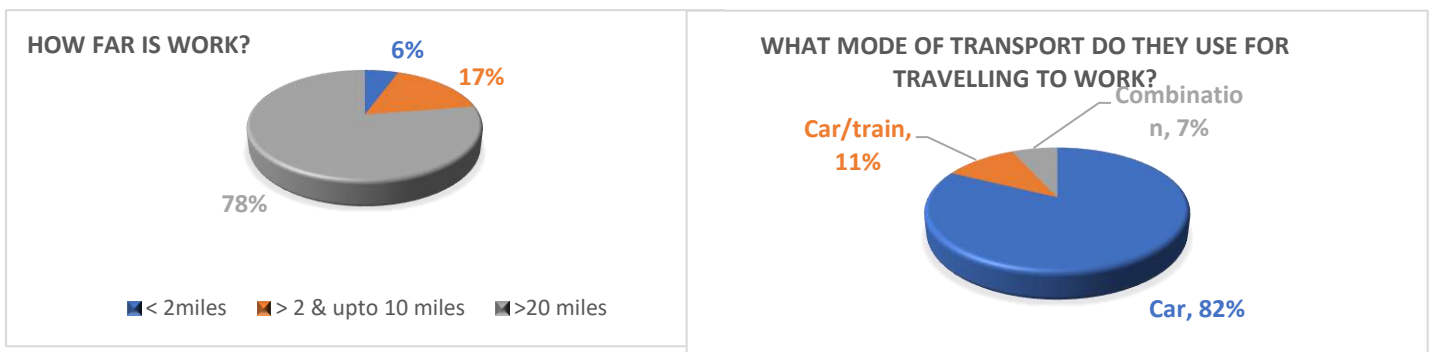
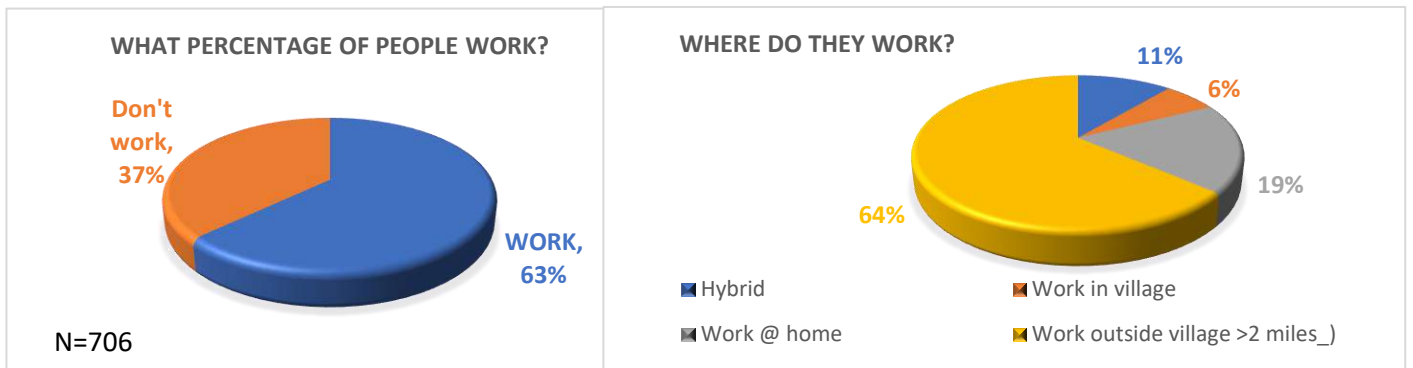
Four Marks & Medstead	Horndean
Station Approach – Dukes Mill	Enterprise Industrial Estate
Station Approach - Mansfield Business Park	Hazleton Industrial Estate
Station Approach - Woodlea Park	Highcroft Industrial Estate
	Hillside Industrial Estate
	May's Yard
	Wessex Gate

# ATTACHMENT 3

## SMASH TRAVEL SURVEY

Conducted between 09/12/2022 till 04/01/2023 n=706 replies

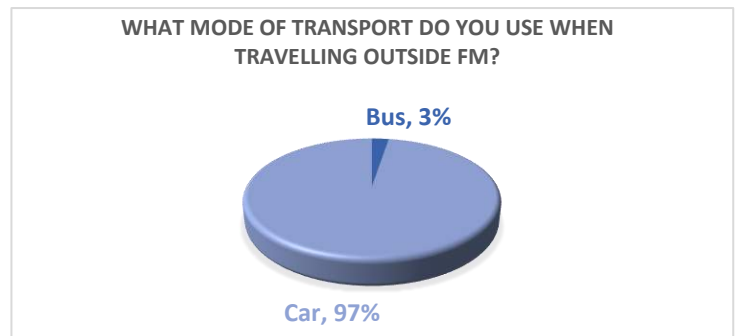
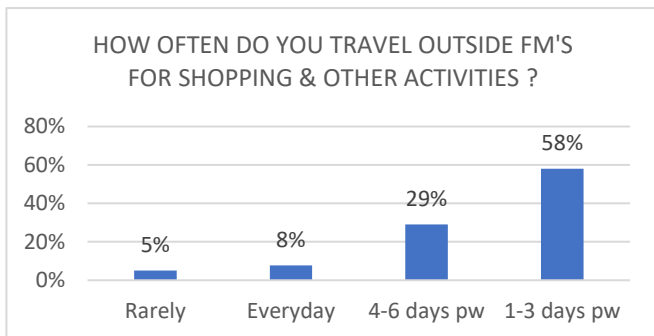
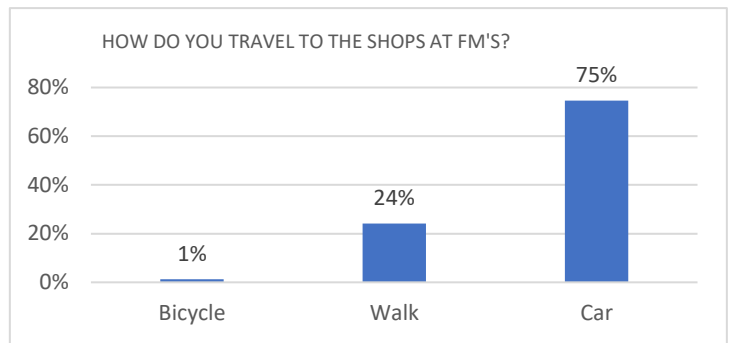
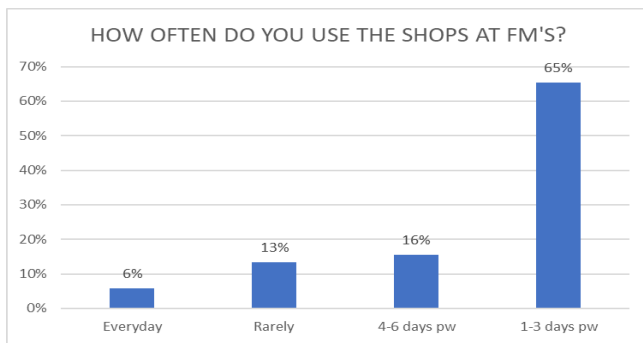
### EMPLOYMENT



63% of people work, 75% work outside the village at least some time in the working week.

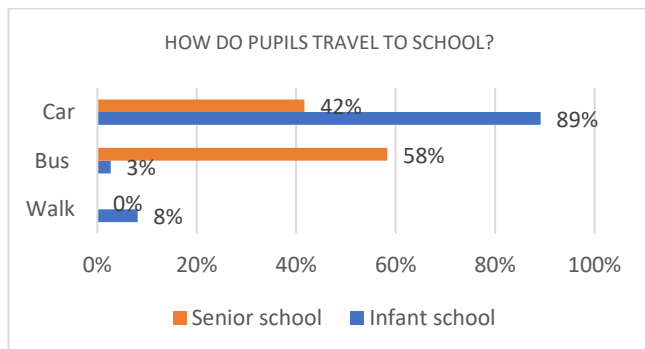
78% % of these people drive >20 miles. If you include car+ train then the figure increases to 93%.

## SHOPPING AND OTHER ACTIVITIES (eg leisure)



The primary mode of transport whether visiting local FM's shops or travelling outside FM's for shopping/other activities is overwhelmingly the car

## EDUCATION



Pupils attending the local primary school predominately use the car

Pupils attending the senior school (outside FM's) use a mixture of school bus and the car

## CONCLUSION.

This survey confirms that vehicle usage for the residents of Four Marks and Medstead is an essential part of living here. The concept of a 20-minute neighbourhood does not fit this location – in reality, we would argue that it is only a workable concept in towns and cities.

These results are not unexpected for rural/semi-rural communities.

## **Stagecoach Representations to the East Hampshire Local Plan Issues and Priorities Consultation**

### **1. Introduction**

Stagecoach recognises the importance of the opportunity to make these representations, on the East Hampshire District Council (EHDC) Regulation 18 Issues and Priorities consultation. It is important to acknowledge that this Regulation 18 consultation is not exclusive from those undertaken in 2019 and that EHDC have considered previous comments and representations in its preparation.

However, we wish to stress that key points that Stagecoach has made in the past remain highly relevant to the Local Plan preparation process at this time. In a rural District like East Hampshire, where patterns of movement are relatively extensive and local internalisation of trips for key journey purposes including post 16 education and employment, is relatively low. Accordingly, the implications of the spatial strategy chosen on the generation of carbon is exceptionally high. Any approach that perpetuates existing high levels of car dependency, will fail to secure the crucial alignment of land use planning strategies with the need to radically reduce the carbon emissions arising from personal mobility in the District.

To make a meaningful and permanent contribution to reducing both the energy and carbon intensity of mobility in East Hampshire, the Plan must identify and maximise the opportunity to consolidate density of flows, to allow public transport to offer greatly more relevant and attractive travel choices to both existing and new residents.

It is a fallacy that the rural nature of the District, with no large settlements or large central places offering a large range of employment, high-level services and amenities, would not permit this to take place. In fact, if the plan is focused on key public transport corridors, reinforcement of demand on these would allow for the further substantial augmentation of frequency and hours of operation of service, leading to substantial mode shift.

Stagecoach has made representations to key Regulation 18 stages of consultations over the last few years. We have engaged as actively as we can within limited resources to signal key issues and provide evidence to stakeholders including the District Council, Hampshire County council and a number of promoting parties. The representations included a comprehensive response to the EHDC Draft Local Plan 2017 – 2036 Reg18 consultation in March 2019.

We have already emphasised the key potential for strategic sites on the Service 64 bus corridor between Alton, New Alresford and Winchester. This corridor is by far the most important bus corridor in the District, leaving aside the far northern extremity of the First service 6 that acts as an extension of the urban bus network in the Havant and Waterlooville area as far as Clanfield. The 64 is comparable to the role of the railway at Liphook and Petersfield, measured in terms of annual passenger boardings.

The 64 is an excellent example of this reality. Already the strongest service in the District, it has recovered fastest from the effects of COVID. Stagecoach is actively looking to reinforce Sunday frequencies in the near term, creating an unusual 7/day/week offer at a consistent core frequency – something rarely seen even in big conurbations. We remain strongly convinced of the opportunity for medium and longer term frequency enhancements. In the short term, we are able to invest in brand new EURO-VI ultra-low emissions buses.

Stagecoach notes that on 28 June 2021 EHDC published that, following extensive site assessment work and the Large Site Consultation, Chawton Park Farm on the 64 corridor west of Alton, was considered as the most sustainable area to develop, with links to Alton's transport infrastructure, services and facilities. We remain of the view that this is one of the strongest performing options available to The Council.

We are also in dialogue with promoters north of Four Marks/Medstead. Again, in a similar manner, we recognise that this option presents a key opportunity to provide for new homes and to consolidate an existing service centre with new employment, in one of very few localities where a relevant public transport offer can be provided from first occupation, and substantially improved.

Stagecoach recognises that Housing is a key issue and priority for EHDC. It remains a key concern for Government, notwithstanding the current political environment. It is a high and rising concern for all employers especially in the service sector such as ourselves. The costs and availability of housing in sustainable locations has a direct bearing on this company's ability to recruit and retain staff over an extensive swathe of England. Some of the labour supply pressures are, unsurprisingly, in Hampshire.

However, housing numbers cannot be viewed in isolation from the need to achieve sustainable development in the round. The National Planning Policy Framework (NPPF) sets the clearest of objectives for plan-makers, that strategic policies should set an overall strategy and make provision for housing as part of achieving sustainable development, having regard to a full range of themes and considerations of material impacts on the environment, society and the economy.

Given the particular sensitivity of any spatial strategy in a rural area to the opportunities for sustainable transport, which are obviously a great deal less ubiquitous than in more densely populated contexts, **it is crucial that transport, accessibility and mobility issues are given some of the highest weight as the Council considers its spatial options. It is erroneous, as it is unsustainable, to pursue a strategy driven on the assumption that there is no realistic alternative than for the population of the District to use personal motorised mobility for the vast majority of regular journeys within to and from East Hampshire.**

Stagecoach is concerned that the current consultation risks being a "reset" that does little to draw new information or evidence into the plan-making process. The technical and political challenges again, are quite evident, and we see little to convince us that the factors that present difficult choices and trade-offs are hugely different than they were in 2019 or 2020. The spatial and locality-specific contextual issues facing the District remain the same – very little has changed. To the extent that a larger number of the most affluent and office-based parts of the working population working a substantial amount of time from home, many of these journeys were being made by rail, out of the District entirely. While this has profound implications for the longer-term net costs and sustainability of the rail network in the South East in particular, it does not in our analysis present a fundamental change to the opportunities and constraints on the Local Plan Review. The rail network and offer is a "given".

In fact, if anything has changed, those challenges surrounding affordable housing delivery have only become more pressing.

Based on the requirements of Paragraph 22 of the NPPF, Stagecoach is aware that adoption must be achieved before the end of 2025 to ensure that the Plan covers a minimum 15 year horizon - now 2040. This needs another 2 years of supply to be identifiable between 2038-2040, while in the meantime immediate needs are pressing.

Stagecoach struggles to understand any legitimate technical reasons why the current consultation is being undertaken, given years of work previously undertaken by EHDC and a very wide range of other consultees including ourselves as a major transport provider, as part of the 2019 Regulation 18 consultations and then later updated through the revisit and reinforcement of the Sustainability Assessment of the Strategic Site Options in 2020-21.

Rather, in the meantime, housing delivery remains challenged, and the short term prognosis that delivery will increase looks optimistic – to say the least. Stagecoach is aware that in September 2022 the Council published its Five-Year Housing Land Supply Position Statement showing that at April 2022, EHDC can demonstrate a housing land supply of only 4.78 years. This triggers the "presumption in favour of sustainable development" outside the plan-led system. Even if the parameters set in national policy that govern this should be revised to 4 years as currently proposed, **the trajectory still risks rolling backwards in the short term to the point that the risk of uncoordinated development on a dispersed range of sites, without great weight being attachable to transport matters, will be proposed and consented** at appeal if not by the Council itself.

We are well aware elsewhere in the South East in particular where recent decisions are being made at s67 appeals to consent significant development in locations where it is both demonstrable, and accepted by the

presiding Inspector, that there are no realistic alternatives to using cars for pretty much all everyday journeys.<sup>1</sup> This lies in the face of the policies set out in Chapter 9 of NPPF and in adopted Local Plans. Far from supporting a more sustainable patterns of development, that reduces carbon, improves socio-economic inclusion and contributes to more active and healthy lifestyles, this results in the opposite.

The current further delay in local plan preparation timescales mean that the Council is at still greater risk of in effect “outsourcing” difficult decisions on the location of development in the short term, to the Planning Inspectorate. In so doing it will be unable to control how development comes forward across the District in a way that is crucial to steering the pattern of development in East Hampshire towards those relatively few options that can strongly support low-carbon, more active and more socio-exclusive mobility, that at the same time makes best use of both transport and other forms of social infrastructure.

## 2. Representations on the draft East Hampshire Local Plan

This section sets out Stagecoach South’s specific comments to the draft East Hampshire Issues and Priorities Regulation 18 Part 1 Local Plan (2021-2040) questions. We hope to transcribe these into the Council’s Consultation Portal but this may not be possible by the time this system closes.

### VIS1. How do you feel about this vision?

*‘By 2040 our residents will live in healthy, accessible and inclusive communities, where quality homes, local facilities and employment opportunities provide our communities with green and welcoming places to live, work and play and respond positively to the climate emergency’.*

#### Unhappy

Evidently, in the light of the national legally-binding commitment to net zero by 2050, and the Council’s own stance on the Climate Emergency the vision must demonstrate a proactive approach to planning for the climate emergency. It is a fundamental requirement that we do not meet today’s needs – including for housing – while prejudicing future generations meeting theirs. The Plan needs even greater focus on tackle the emissions that cause climate change – of which those rising from personal mobility represent the largest single component and the only one that is rising relatively and absolutely.

The National Decarbonisation Strategy for Transport (July 2021) makes plain that **a substantial and immediate reduction in the number and proportion of trips made by car is essential** to achieving the trajectory, especially in the shorter term. Therefore, the role of active travel and public transport to achieving the Vision should be considered absolutely fundamental. Page 4 of the consultation document states *“the best quality homes to be built in the best places, to meet all the needs of our residents in the most sustainable way possible. We want our new Local Plan to be as proactive as possible in meeting the challenges of the climate emergency and to ensure any development is **as sustainable as possible.**”* We believe this is possible, but only if the Vision is explicitly steering the plan-making process in that direction. Given that emissions reduction from all new buildings will be achieved through national polices – notably the changes to national building regulations- and from wider decarbonisation of the grid, **transport and mobility is by far the biggest and most challenging area of decarbonisation that the Council should seek to address through the Plan, and must do so through its spatial strategy, and strategic allocations directly and tightly conforming to it.**

To achieve the Vision, that development is “as sustainable as possible” the Plan must seek to identify an optimised spatial strategy that is strongly directed to locations where both short and longer distance journeys can be met by sustainable modes – especially those that are beyond a short walking distance, where public transport is the only realistic alternative.

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<sup>1</sup> See for example APP/U1430/W/22/3304805 Land at Fryatts Way, Bexhill, published 6/1/23. This recent decision in a similarly rural authority, Rother District in East Sussex, is of particular concern, but is far from unique.

We urge that the wording of the vision is amended as follows: *“By 2040 our residents will live in healthy, accessible and inclusive communities, where quality homes, local facilities and employment opportunities **and sustainable travel choices** provide our communities with green and welcoming places to live, work and play and maximise our response to the climate emergency”*.

We are also concerned that the Council no longer apparently considers that meeting housing needs should be a focus for the Plan. The omission of homes for all or “a front door for everyone” which was in a previous version raises serious concerns to us. As well as being excised from the Vision it is not mentioned at all on page 9 which lists Strategic Objectives.

**VIS2. Does the vision cover the key matters of importance that the Local Plan can influence and inform?**

**No**

***VIS2a If no, please tell us what is missing from the vision and why this is important***

As explained above the Vision should be explicit that the plan and its development strategy should seek to ensure that attractive sustainable travel opportunities are facilitated and provided.

The Plan should be clear that it is seeking to **address housing needs** for everyone – and in particular affordable housing without which key economic and social elements of sustainable development are prejudiced.

**VIS3 Should the Vision be more specific about areas of the district being planned for through the Local Plan?**

**Yes**

***VIS3a Please explain your answer***

The areas of the District being planned for should be set out and justified in the Vision inasmuch as EHDC is not the LPA for the South Downs National Park, that covers a great deal of the District.

However, the Vision should not seek to prejudge the definition of the spatial strategy. Nor need it do so. This should be clearly stated within the policies and explanatory memoranda of the plan, where required, and be tied back to the technical evidence supporting the Plan.

As we have stated we disagree that there are major new issues that have emerged since the last Reg 18 consultation. Rather, the time lapsed since 2019 and the consequential delay in plan making has just made the need to provide an up to date Local Plan to tackle these already-identified issues even more acute.

**QV1. Please sort these key issues in order of importance to you**

- Infrastructure
- Environment
- Types of Housing Needs
- Population and Housing
- Climate Emergency

**It is not the job of the planning system or plan-making at LPA level, to seek to redefine national policy objectives, nor to assign different relative weights to the importance of each. To the extent that there is a need to be explicit about the levels of importance given to key themes, including landscape character and value, biodiversity and habitat, and cultural heritage, these must be directed by national policy. Accordingly these are already set out in NPPF and in National Planning Practice Guidance.**

**NPPF makes plain all** of the above key issues to be of high importance. To seek general advice on ranking these issues is to inappropriately deny the role of the planning system and plan-making. It is for the plan to seek to meet development needs in a demonstrably appropriate manner which responds to all of these matters in equal measure, simply because it is not possible to deliver new communities without infrastructure and without mitigating our impact on the environment both locally and globally.

**CLIM1 Do you agree that new development should avoid any net increase in greenhouse gas emissions, wherever practicable?**

**Yes**

Greenhouse gas emissions within East Hampshire arise from a range of sources. Nearly 40% of emissions arise from transportation in the District. In practice this will mean that marginl gains in decarbonising the District need to facilitate the highest possible use of low- and zero-carbon mobility. Given that walking and cycling can address trips that are relatively short – up to a *maximum* of 5km and n practical terms less than 2km if they are to form part of a realistic lifestyle, this means the availability of quality public transport will be of the essence in achieving the Plan Vision.

**CLIM2 So far, you've told us the following - but what's most important to you?**

- *That all new buildings should be zero carbon: This is a national commitment* that will be achieved from 2025 through National Building Regulations. It is not a matter on which the Local Plan can any longer have a meaningful influence.
- *That every new development should have renewable energy provision and that any wind or solar development must be in-keeping with the locality and its surroundings.* This is a matter that is highly technical but focus on on-site renewables should not detract from the need for development to be located sustainably to begin with.
- *That the construction of new buildings should use less fossil fuels and more recycling of materials.* See above. There needs to be much greater focus on addressing the long-term carbon impacts of transport and mobility. The reduction of industrial carbon emissions are hugely more responsive to national and international policy protocols and legislation
- *That climate change policy should clearly identify the impacts on water availability, with water consumption being reduced in new developments, including by reusing it on site.* This is ultimately a matter for Building Regulations. The Plan should focus on meeting development needs in a way where the spatial pattern of development is most sustainable.
- *That trees and other green infrastructure could play an important role in reducing flood risks.* This much is well evident. It is addressed head on in national policy including the National Model Design Code. It is likely that the National Development Management policies will also address this area, among many others.

In short - **key pillars of good environmental design are likely to be addressed comprehensively through National Development Management Policies. Locally-specific guidance on how these are best achieved and interpreted is not likely to form the basis for strategic policies in the Local Plan.**

**It is critical, by contrast that the plan tackles greenhouse gas emissions from transportation** through a clear focus on this area, to ensure that active travel, and public transport can facilitate high quality access both to local services and amenities and as far as possible, more widely.

**CLIM3 Do you agree that the Council should define 'net-zero carbon development' in this way?**

**No**



**CLIM3a If you answered ‘no’, how should the definition be improved?**

Whilst the statement of ‘net zero carbon’ development is intended to minimise carbon dioxide emissions, achieving this especially in the next 10 years, **demands the reduction of energy consumption. This is the main reasons why the National Decarbonisation Strategy for Transport places such a large emphasis on mode shift away from private cars.**

From 2035, the government is planning to decarbonise the national electricity grid, meaning that all non-fossil fuelled development will be decarbonised at the same rate. However there are serious challenges surrounding renewable generation capacity and thus electrification *per se*, cannot secure the national carbon goal on its own. Energy intensity of all uses – and transport in particular, are essential.

In the context of all rural authorities – such as East Hampshire, we would point out:

- Over 60% -and possibly as high as 75% of all emissions arise from journeys of over 10kmnm where cycling is not a credible option
- The length of journey is a large part of the reasons for this
- However, the energy and carbon intensity of longer journeys also rises with speed.

For these reasons, in rural contexts, **it is not in the least sufficient to rely on local trip internalisation (such as 15/20 minute neighbourhoods) on the one hand; or electrification of passenger cars on the other.** The availability of direct frequent regular and reliable public transport is the only realistic way of addressing the energy and carbon impact of existing as well as future mobility needs.

**By creating greater density of flow and thus demand on key corridors, thus catalysing better and more attractive bus options, and securing mode shift from existing population, the Local Plan can benefit from leveraging a “gearing” effect in transport related energy demands** in the short as well as longer term, materially helping to secure **both** carbon reduction and energy security. In fact, if successful, the Local Plan would probably secure a greater carbon reduction from this than from any other area policy might appropriately address.

**CLIM4 In the future, should the Council’s policies on the design of new buildings focus more strongly on tackling climate change in accordance with the energy hierarchy?**

NO

**CLIM4a If you answered ‘no’, how should we balance the design of new buildings with the need to tackle climate change?**

Stagecoach has no comment, except to say that national government is best placed to work with industry to address the technical matters that secure the most rapid and robust reduction of emissions from buildings in use that would be secured through nationally legally-binding Building Regulations.

**The transport hierarchy**, focusing on walking cycling and public transport is long established in national policy. It has profound spatial implications and expression. Why does this not feature very much more clearly and consistently as a governing principle steering the plan-making process from first principles?.

**CLIM5 Should the detailed criteria for tackling climate change be specified in any of the following?**

Yes

- *In the emerging East Hampshire Local Plan (Yes)*
- *In future neighbourhood plans (Possibly)*
- *In local design codes. (Potentially)*

**CLIM5a Please explain your answer**

The role of Local Plans is clearly intended to be much more focused on spatial matters. Aspatial matters will be more clearly signalled in the National Development Management Policies (NMDP). Alongside this, there is and further national guidance that is expected to be complied with in development proposals, where they are worked up on a site-specific basis. This will include Manual for Streets 3, which ought to emerge very shortly.

Stagecoach urges EHDC to maintain focus on the clear principle that if the Local Plan drives a spatial strategy and pattern of development, supported by strategic allocations, that effectively hit existing as well as future transport-related emissions by transforming the relevance and attractiveness of walking cycling and public transport in the larger villages and towns of the plan area, then the Plan will most likely secure the greatest positive impact on emissions.

**However emissions are not the only area that would be profoundly improved by such an approach.** Other key issues explicitly included within the Vision, such as socio-economic inclusion, and healthy active lifestyles, also depend on this.

It is important that beyond a robust sustainable development strategy and form, any more detailed locality- or site-specific criteria for tackling climate change should be specified in the emerging Local Plan as far as possible. For example, the Local Plan should contain policies that apply to specific strategic allocations, or around identifiable localities where several developments, of different scales, might contribute to or benefit from a comprehensive approach to materially improving the walking cycling and public transport offer. **This will be essential to ensuring alignment with other policy not least Hampshire’s Local Transport Plan**, as well as delivering key targets for sustainable travel that should be committed to within the Local Plan itself.

There should generally be no need to repeat or duplicate national policy in the Local Plan, nor Local Plan policies in in neighbourhood plans or design codes.

However, it is appropriate for design codes to ensure that the **detailed design of development proposals comprehensively consistently and ambitiously identifies and maximises the opportunities for walking cycling and public transport, not just within the development itself but across the immediate locality.**

It *might* be appropriate for Neighbourhood Development Plans to seek to pursue similar goals but only if it can meaningfully achieve them. A NDP that does not seek any material change in terms of development in a locality is highly unlikely to be able to secure resources to achieve substantial improvement in the sustainable travel offer.

**CLIM6 How do you feel about using the idea of “living locally” to influence the location of new homes?**

**Neutral**

**CLIM6a Please explain your response**

Stagecoach naturally strongly supports the concept of “living locally” but our concern is that in pursuing a strategy based on an abstract concept, this demonstrably leads to the desired outcomes. We do not consider that this concept is applicable to defining a settlement hierarchy – obviously so, because it only accounts for a range of local services, and certainly does **not** account for employment and participation in wider society.

In the UK the freedom the car offers is unparalleled in history. Society has become used to a huge range of choices not just in where they live, but where they participate in wider society – such as in employment – and where they take advantage of public services. Even in dense urban areas, patterns of movement and spatial interaction are very complex and reflect people making a huge range of choices which reflect innumerable behavioural influences. These far from exactly correspond to using the nearest choice. Just because a facility or service is within a 10-minute walk does not mean that it will be used – especially is car opens up a huge range of other options.

This is even more likely to be the case in rural localities. IN the case of East Hampshire, the range of choices within even the largest urban area – Alton – is a great deal more constrained than it is in settlements much higher up the economic and service hierarchy; and more so still in the second largest – Bordon and Whitehill.

Stagecoach accepts that the concept should form **one important component in the selection of individual sites, within a locality that demonstrably provides the potential for a higher level of self-containment.**

However, it should be obvious that **the 20-minute principle does not form a suitable basis on which to determine the settlement hierarchy itself.** This is because, dependent on the definition of essential services, a relatively large number of settlements could be considered to offer 20-minute neighbourhoods. By virtue of this the definition of the urban hierarchy is artificially flattened to include in practice, any settlement with a shop and primary school – since villages of this size generally also support a wider range of local services, albeit restricted.

However, **regular journey demands relate to key travel demands to destinations and facilities that are much less broadly distributed than the facilities that generally are encompassed within the definition of “daily needs” or “local services”.** Of these, a broad range of employment opportunities is an obvious one. Primary Care facilities are another – where the provision of these services is becoming progressively more concentrated in fewer localities. The location of 11-16 education is a major contributor to car-borne movements, and car account for as much as 30% of car-borne traffic at peak times. In Hampshire post-16 education and training is even more concentrated in large-scale specialist multi-functional sites than it is in many other authorities, albeit the District benefits from having one in Alton itself. However even a discount supermarket requires a threshold catchment that makes them only likely to be found in the District’s three or four largest settlements.

The attenuation of the urban hierarchy in EHDC (absent substantial employment and service hubs of sub-regional significance) might be considered to make the distinction less important. We would refute this. The context of the District as a result of this tends towards extended patterns of movement that cross the District Boundary – especially to higher order centres such as Farnham, Guildford, Basingstoke, Winchester and Waterlooville/Havant. Realistically, these travel demands are unlikely to be amenable to great change – nor, if the Vision is to be achieved would this actually be warranted. **This is ignored by the “living locally” concept.**

We would go further. If the application of a 20-minute neighbourhood establishes the basis for distribution of development it risks significant amount of affordable housing – including, in particular, social housing – being located where there is a local shop and a primary school, but little more. Allocation of these homes according to local housing need on a District-wide basis could be expected to lead to households being allocated properties remote from social and family relationships, as well as existing and potential employment. Without the ability to live without a car, either the household gets saddled with high costs of car ownership and use, or existing issues of socio economic exclusion become severely aggravated. **This is unsustainable.**

In identifying localities that are appropriate as a focus for development, the Plan therefore needs to place a very high focus on is those public transport corridors that allow residents to participate most fully in society and meet their needs on a much more sustainable basis without having to use a car. **Thus, settlements and strategic development options that lie directly on the key public transport corridors will be those where the most sustainable, lowest-energy-intensity and lowest carbon emissions from transport can be secured.**

Furthermore, Stagecoach concludes that the approach to determining 20-minute neighbourhoods used by the Council is crude and as such fails to differentiate sufficiently and appropriately between potential development localities in terms of their ability to achieve the objectives set out in Chapter 9 of NPPF, especially paragraphs 103-104. These require plan strategies to reduce the need to travel first, then ensure that sustainable modes offer the most relevant and best possible choices. In fact, **the proposed revised methodology is so simplistic that is likely to seriously underplay the potential of localities and sites which are demonstrably the best placed to achieve the Councils Local Plan Vision. The application of this rather idiosyncratic interpretation of the 20-minute neighbourhood concept,** as the basis for plan-making, would affect the ultimate strategy so seriously as to make the development strategy unsound without remedy, and

therefore risk the Council having to start yet again at a plan that is demonstrably sustainable – and irrespective of any possible changes to the need for evidence to support a Local Plan will still need any planning applications that follow to comply with the National Development Management Policies.

The key reasons for this are as follows:

- **Alton is clearly evidenced to be the largest employment centre within the District.** Based on previous employment strategies and need assessments, it is quite clear that that further growth is very likely to be identified for the town through the emerging employment strategy. This will reinforce its relative importance as an employment destination within the District. In fact the town is the only settlement in the District that draws in significant journey-to-work movements from outside the District as well as within it. It also hosts Alton College which also draws its student population from an extensive hinterland. This means that **Alton is, almost uniquely, both a significant trip generator and attractor.** That, as a direct result, allows public transport to be greatly more efficient as there are two-way flows from the town – vehicles do not as a result run back empty especially at peak times. The college also anchors the bus offer as buses are running full on a number of journeys that contributes a substantial proportion of the total running costs, and also allows the buses and staff used on the network into and out of Alton to economically provide off-peak journeys which in effect run at marginal costs. It is unsurprising on every level that Alton has the best public transport connectivity in the District.
- Flowing from this, each of the main bus corridors from Alton to surrounding larger settlements should be considered crucial to ensuring that the largest numbers of trips over longer distances can be served by public transport. Augmenting these bus corridors – especially the already popular service 64 to Winchester – can be expected to greatly improve the relative attractiveness of these services in support of wider mode shift across the plan area, and supporting wider Vision objectives including socio-economic integration and public health. We must emphasise the need to consider the availability of alternative modes of travel for journeys between settlements since there is currently a sparse provision of frequent current public transport network that provides a viable connection between settlements for the purposes of inter-urban travel.
- Development self-containment. It should be evident that where about 1200 or more dwellings are to be provided within a single development on in a number of closely linked sites in very close proximity, there will be a sufficient level of demand to support the creation of a new “20-minute neighbourhood. In fact, based on typical residential densities, it is well conceivable that as many as 1400 dwellings could be provided on sites with all homes being within about 400m-500m walk of a new substantial local centre. The methodology makes no allowance for this, and as a result fails to support the identification of sustainably located new or expanded settlements – or new villages closely linked to a larger town. Such opportunities are demonstrably identifiable on key public transport corridors. In addition where substantial development is adjacent to an existing settlement it might be of sufficient scale to substantially boost the level of local facilities and services. This might be greater range of retail outlets, community facilities or a larger school, with better ability to support efficient delivery of a broad curriculum. It would certainly have the potential to boost the frequency of bus services. A methodology that fails to allow the plan to identify such opportunities seriously undermines the appropriateness and, most importantly, the effectiveness of the Plan strategy.

#### **POP1 How do you think we should proceed?**

- *Use the standard method for calculating housing need as the basis for determining the requirements against which the five-year housing land supply and Housing Delivery Test are measured - Yes*
- *Further explore whether exceptional circumstances exist to be able to devise a revised local housing requirement. - No*

#### **POP1a Please explain your answer**

There is an urgent need for new homes in East Hampshire. The Plan should seek as a first step to establish swiftly what that need figure is. Only then might it be demonstrated whether or not this need can be met. It is unacceptable that the Council prejudge at the outset that it cannot meet the requirement, especially since other authorities adjoining themselves suffer from very similar constraints.

The standardised methodology for calculating the Objectively Assessed Need (OAN) for every Local Planning Authority (LPA) in the country was proposed and established in 2017 – mainly to make the process of establishing need swifter and allowing for greater certainty when preparing and examining local plans. The government remains absolutely clear that having up-to-date local plans in place is essential for the proper functioning of the planning system according to the law.

Paragraph 61 of the current National Planning Policy Framework states

*“To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless **exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.** In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.”*

While the constraints and challenges in planning to meet development needs at any scale in the District have long been evident, we see very little that is “exceptional” about the circumstances that EHDC is faced with. In terms of designations and physical constraints, including ecology and landscape, these apply to most of the South, South West, East Anglia, South Midlands, North West Yorkshire and the North East. When the policy constraint of statutory Green Belt is also considered then East Hampshire can be considered less constrained than many places.

Furthermore Planning Practice Guidance (PPG) draws a very clear distinction between the standard method, which identifies a minimum annual housing need figure and the housing requirement figure that is separately derived following examination of a range of contextual factors including the needs of neighbouring authorities. (Paragraph 002 ID Reference: 2a-002-20190220). It says *“The standard method for assessing local housing need **provides a minimum starting point** in determining the number of homes needed in an area. It does not attempt to predict the impact the future government policies, changing economic circumstances, or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method”* (Paragraph 010, Reference ID: 2a-010-20201216, emphasis added). **Accordingly, to be compliant with NPPF and PPG, the new Local Plan is not given latitude in which course to pursue.**

Stagecoach notes that the Housing and Employment Development Needs Assessment (HEDNA) (Iceni, May 2022) states it is not considered necessary for the Council to increase the Local Plan housing requirement **above** the standard method as a result of the affordable housing needs. However the HEDNA makes very plain that these needs are acute. East Hampshire’s current affordability ratio (median house price to median workplace-based earnings) is within the top 35 authorities in the country (330 in total), and is the 13th highest authority outside of London. Overall the South East has seen the biggest increase in affordability ratios since 1997, an increase of 166.7% (Office for National Statistics), and the position of worsening affordability is likely to increase due to the current economic uncertainties.

Thus the conclusion of the HEDNA that the SM requirement should not rise in response to this, is highly contestable.

However to seek to start the plan-making process again while seeking from the outset to provide less than this figure is manifestly not appropriate if the Council does not wish to create still further economic and social problems in the area.

**POP2 Are there any strong reasons not to use the housing need figure of 517 new homes per year for the Local Plan?**

No

***POP2a Please explain your answer***

See comments above.

**POP3 Based on the above should we meet**

- **All the housing needs of East Hampshire's part of the SDNPA**
- **Some of the housing needs of East Hampshire's part of the SDNPA**
- **None of the housing needs of East Hampshire's part of the SDNPA**

***POP3a Please explain your answer***

2.42. As the consultation document at page 24 is clear that there is no new evidence that justifies any change to the existing approach agreed in the Statements of Common Ground between the two authorities.

**POP4 At present we do not know the precise amount of unmet need but we are aware of our neighbours seeking help, therefore do we:**

- **Offer to assist with all unmet needs, regardless of scale and location**
- **Offer to assist with some unmet needs, where there may be a direct relationship with the communities of East Hampshire**
- **Do not offer to assist with any request from our neighbours**

***POP4a Please explain your reasons***

2.43. Whilst the precise amount of unmet need is still to be agreed, given the timescales for the adoption of this new Plan (2025) assessing and planning for the level of unmet need through Statements of Common Ground between the relevant adjoining authorities will be very challenging within the timescale irrespective of the numbers involved.

The scale of the challenge is also great. Stagecoach is aware from our participation of the City of Winchester Local Plan consultation that PfSH formally agreed to enter into a Statement of Common Ground (SoCG) between its ten member authorities in September 2020. The first iteration of the SoCG was only released in October 2021 and set out an anticipated shortfall of 12,896 dwellings across all ten authorities for the period 2021-2036. PfSH is now of the view in its latest work that there exists an unmet need of **19,865** dwellings for the period of 2022-2036: a 54% increase.

The wider situation is worsening rather than improving, and it is more important than ever for authorities within PfSH to try to accommodate more unmet need if they can realistically do so. This is not simply a matter of ecological and other constraints. It is crucial that these needs are met closest to where they arise, as far as constraints allow, to avoid exacerbating energy- and carbon-intensive patterns of movement.

Not to meet these needs in such a way also exacerbates house price gradients leading to ever longer journeys especially for key workers in the service sector who are most affected by affordability issues with housing. **In recruiting and retaining staff across the South of England, Stagecoach is itself faced directly with the consequences of high housing costs in staffing its operation while maintaining a cost base that is sustainable.**

We therefore would expect to see if there is any scope to make a realistic contribution to help meet unmet need of the neighbouring authorities. If this is possible, this should be in addition to the standard method minimum requirement.

**HOU1 What should a specific policy on older persons accommodation include?**

- **A specific target in terms of numbers of homes for older persons accommodation to be delivered within the plan period** Yes
- **Specific types of homes to be provided** No
- **The location of these homes across the district** Yes

***HOU1a Please explain your reasons***

It is essential that elderly accommodation is provided with immediate access to public transport to allow residents to live independently without the need to own and use a car. This is crucial for a wide range of reasons that relate to independence and well-being of an ageing population, as well as the wider rationale that applies to all new development.

**HOU7 The current requirement is that 40% of new homes on qualifying sites are affordable homes? Should the % requirement for affordable homes be**

Stay the same

***HOU7a Please explain your answer***

It is clear that the delivery of affordable housing should be maximised, given the HEDNA evidence.

However we note that in recent years, despite the established 40% target somewhat less than 30% of new homes delivered have been affordable. This is good evidence that achieving a higher proportion might in fact be unachievable on viability grounds. To achieve a higher affordable housing proportion on radically less delivered development, is clearly not a sound approach.

Rather, if the Council wishes to increase the amount of affordable housing provided it is more likely to do so, across a wider range of sites meeting those needs close to where it arises, if it considers increasing the overall level of housing delivery, but increasing the annualised housing requirement above the standard methodology to some extent.

We would also urge the Council to look to secure a larger proportion of need from allocated sites – bigger than 15 dwellings – rather than seeking to use “windfalls” to meet a proportion of needs. A large proportion of those sites are too small to provide any affordable housing. Much of the current undershoot no doubt arises from this effect. Windfalls should be “over and above” the level of housing provided for in the local plan.

**ENV1 Which of the below environmental considerations is most important to you?**

Stagecoach has no comments to make on this matter.

**INF1 What type of infrastructure is most important to you?**

Stagecoach is clear that for sustainable modes to play a much greater role, the quality of active travel and public transport infrastructure must radically improve not only within new development but more widely across the District and where buses are concerned, beyond it.

It is crucial that bus services can make reliable and efficient progress, and this is as true on the wider highway network as it is within them.

Stagecoach advice on infrastructure and urban design on major new developments to facilitate high quality bus services can be accessed at:

[bus-services-and-new-residential-developments.pdf](#)

**INF2 How do you feel about the allocation of CIL funds to date?**

Neutral

Were it the case that CIL could realistically be set at a level that would cover a full range of infrastructure e heads including public transport improvements then we might be more unhappy. We are realistic – it is never going to. We note that government is in the process of examining a complete change to land value capture to fund key social and transport infrastructure.

**INF3 Which of these do you think provides the best outcome for infrastructure provision?**

A mix of these (smaller medium and larger sites)

***INF3a Please explain your answer***

As explained on pages 46 and 47 of the Consultation Document Large Development sites can deliver the “greatest provision of infrastructure locally”. This is not just physical infrastructure but through CIL and on site provision large sites deliver a wide range of services and essential facilities. There are abnormal costs to this.

In addition very large sites (typically over 2000 dwellings) create “point loads” on highway systems and at junctions already close to saturation, that that often make the need for costly off-site highways improvements unavoidable. This can affect the viability of a range of other developer funding heads. Of these, the need to support improvements to public transport provision is typically oe of the first to be squeezed and then eliminated.

Finally very large development can take years to build out - even decades. During the development trajectory the completion of key street connectivity through the site can take years to effect. The result of this is that public transport cannot eneter the site meaningfully or at all, until close to or even after final occupation. We have scored of examples of this all over England.

However developments over a broad range of scales from about 40 to about 2000 units are able to meet needs in ways that are proportionate to existing settlements an context, while also affording a wide range of opportunities to delivery blanaced commuhities and also to offer sufficient diversity of supply to both support and de-risk the housing trajectory and, further, ensure that homes are delivered broadly meeting needs across the District rather than seeing undue concentration in one locality.

**DEV1 Please rank these options in order of preference**

Most

Option 2: Concentrate new development in the largest settlement

Option 1: Disperse new development to a wider range of settlements

Option 4: Concentrate development in a new settlement

Option 3: Distribute new development by population



Least

## DEV2 Why have you ranked the options this way?

Notwithstanding the above rankings, Stagecoach does not find that the spatial strategy options as set out at DEV1, is especially helpful. No one option is ideal and all have serious constraints. They imply a serious and inappropriate degree of policy pre-determination and prejudice. None has regard explicitly to the opportunities for sustainable mobility, though option 2 and potentially Option 3 might tend to support higher levels of walking and cycling.

None of the settlements are self-contained – even the largest at Alton. The second largest at Bordon-Whitehill has serious deficiencies in terms of its ability to support a high level of internalisation and its public transport connectivity in many directions is marginal and will struggle to secure sustainable improvements sufficient to make bus service use an attractive prospect for most. The best such prospect is the link to Farnham.

There are serious constraints to the expansion of all the larger settlements – even Alton – through contiguous urban extensions that directly tie into the existing urban edge.

However a single new settlement creates a range of serious issues, not least the complexities and length of time involved in bringing them forward and the fact that housing delivery is concentrated in a single place – which is likely to set up as many new mobility demands as it creates long-term trip internalisation. It should also be remembered that even large-scale government promoted and built New Towns conceived and delivered at a time when car use was a fraction of today's, struggled to achieve the internalisation that was hoped for.

The Local Plan vision and objectives set out to *achieve “delivery of the most sustainable homes in the most sustainable locations”*. **For this to happen any spatial strategy must be to be evidence-led and, in particular, influenced by transport evidence.** Stagecoach finds it dismaying that EHDC has not revisited this evidence in this consultation exercise given its foundational importance in defining a soundly based spatial strategy.

- Option 1: Stagecoach has great concerns that the Option 1 strategy will simply open up the plan to widely distributing development to a range of settlements based on little more than expediency and lack of landscape ecological and heritage constraints rather than one that maximises the opportunity for sustainable transport.

This strategy, if it is informed by the flawed approach to a revised settlement hierarchy that ignores the complex spatial interaction of different employment clusters within the District, will tend to lead to needlessly complex and extensive patterns of spatial interactions and allocate development that lead to dispersal of traffic flows and higher car dependence, rather than a strategy that creates greater density of flow on key corridors, where public transport can meet a radically higher range of mobility needs. It is therefore likely to result in unnecessary vehicle kilometres, emissions and congestion. In this context, Option 1 could well actively work against the stated vision and objectives, unless the settlement choices and hierarchy reflects the potential for public transport corridors. At the moment it does not.

**Option 1 COULD therefore provide a sound basis for planning the District – and even the most sound - but based on the current consultation it is unlikely to.**

- **Option 2:** Stagecoach broadly endorses and supports the principle underpinning Option 2 that the largest settlements are likely to be more significant attractors of trips within the District, such that **delivery of new housing in the largest settlements will create proximity benefits** which would increase the opportunity to travel by non-car modes, reduce vehicle kilometres and emissions.

However, there are limits to how far Alton can grow without breaching clear limits to growth, and having new urban extensions struggle to be properly integrated with the town. Serving these with public transport could also, perhaps paradoxically, be almost impossible. This has been exposed quite comprehensively in research work by others such as the “Transport for New Homes” campaign group.

We think there is clear evidence that points to a linked new village such as at Chawton Park Farm, that could avoid these issues to a great extent – including through self-containment within the new development. However this Option in broad terms is predicated upon opportunities to secure a compact extension of Alton, and we do not see that any such opportunities exist on a conventional sense, of “urban extension”, on a significant scale.

Nor can it be assumed that sites on the edge of the largest settlements, such as Alton, and Bordon/Whitehill, will inherently have access to more comprehensive facilities and better public transport options than smaller settlements. Nor is it always the case, especially at Whitehill, that the options that have been looked at previously would be necessarily be better positioned to deliver the 20 minute neighbourhood principles and have better access to existing walking and cycling infrastructure. We made these points very directly in our 2019 response to the site options presented at that time. We invite the Council to review these responses.

Consequently, while it is reasonable in the context of this spatial option to suggest that only positive impacts on greenhouse gas emissions would result, this is not necessarily the case. It could, perversely, lead to poorly integrated suburban appendages to the larger settlements from which the only credible option for both local and longer journeys would be to drive.

Option 3: Stagecoach again recognises that the principle of a population-derived spatial strategy could replicate the broad results of Spatial Option 2. In this context, both the physical size and population size are likely to imply of a higher range of local amenities and employment opportunities. However that in turn assumes that any of the largest settlements offer a broad range of opportunities and are broadly self-contained. These assumptions, looking at the evidence, are not well enough borne out even for Alton.

**Only by locating development on high quality public transport corridors offering sustainable connectivity to a range of destinations – particularly the 64 route - is the plan strategy realistically able to tackle this issue.**

**Option 4:** Stagecoach has very great concerns about the new settlement option, as it expressed as a stand-alone option, for a number of reasons. The strategy implies the concentration of development at a single new settlement allocation. This is inherently high risk and also spatially highly contrived. Even siting the new town on a public transport route - which it must be to be remotely sustainable – may well not lead to all or even most residents having a sufficient quality of service to avoid car dependency, if many outlying parts of it are a considerable distance from the station or key bus stops. That said a flexible approach in this matter is almost certainly going to be necessary as applying a crude 400m walking distance to bus stops is highly unlikely to be feasible or appropriate.

There are major questions about viability of such developments as well as lead time for developments that are viable. For certain, the need to deliver housing in the near term runs counter to the fact that a single large-scale new settlement of over 2000 homes is unlikely to begin to deliver until later in the Plan period – indeed well after 2030 - and there is a still bigger risk that the plan fails entirely leading to the need to retroactively identify sites outside the plan-led system.

Stagecoach believes that focused development in range of localities well related to sustainable movement corridors is likely to require more than one new and/or expanded settlements. This is rather different to the monolithic Option presented in Option 4, which has no regard to pursuing a spatial pattern that facilitates a much greater use of public transport to meet mobility needs.

In fact we find that commonly, larger new settlement strategies reflect a “BANANA” approach: “build absolutely nothing anywhere near anyone”. Remote exclaves of development are thus proposed that are at the extremities of the plan area exporting both housing delivery and any immediate impacts and externalities to the edges of the plan area, or at least, remote from significant existing communities, which could easily be

viewed as being preferable by being least politically contentious. Extremely ambitious supporting infrastructure programmes are involved, reflecting their relative remoteness and the fundamental challenges of transport economics.

The consultation document refers to a new settlement of a minimum of 1500 homes. This is a new village – not a new town. It is thus not clear what the plan actually envisages. A development of this scale is sufficient to provide a base level of self-containment – local convenience store and primary school. Any new residents would be reliant on off-site provision of a wide range of services of which secondary education stands out. It is also likely to lead more demand for car-borne commuting unless the settlement is well served by a quality public transport corridor.

**Stagecoach considers that new and expanded settlements are likely to be a large part of the answer in East Hampshire, but only if their siting and design is clearly steered by immediate access to a high quality public transport choice.**

### **DEV3 Are there any alternative options we should consider?**

Yes

#### ***DEV3a If yes, please explain***

Following on from the points made above, Stagecoach considers that EHDC should identify an **additional Spatial Option which seeks to identify specific locations for development on the basis of their ability to support or enhance the opportunities for existing and future residents make use of active travel and public transport.**

**This begs a “suitable movement corridor” approach**, articulated around existing corridors able to support at least an hourly inter-urban bus service, and ideally the service 64 which is uniquely able to support a more frequent service running seven days a week, with high quality vehicle and evening services.

By consolidating development at a number of strategic points on one or more public transport corridors, creating greater “density of flow”, and taking advantage of the opportunities and having regard to constraints, it is most likely that development needs can be met across more than one site in a manner that meet needs sustainably and in a timely manner, closest to where needs arise.

The strategy is also inherently flexible. Development would not be dependent on a very few large sites. It could readily respond to the opportunities presented at various points along a corridor, including those that can reinforce the sustainability of existing smaller settlements and improving both local facilities and the local environment – for example new local accessible green space.

The strategy is inherently scaleable, and is also able to indicate how longer term needs – or those rising in other authorities, might be accommodated sustainably, and in a way that supports an increasingly sustainable pattern of spatial interaction and transport choices, rather than overly-pragmatic dispersal.

### **3. Summary and conclusion**

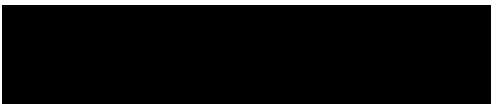
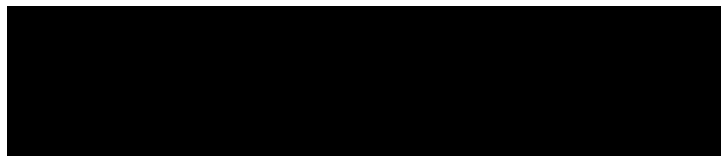
To summarise our responses:

- In broad terms, Stagecoach is supportive of the overall Vision for the Plan presented in the document. However, we have serious concerns about some key omissions and the way in which this Vision is most appropriately and effectively delivered.
- Amendments made to the wording of the Vision to ensure that EHDC recognise the need for the strategy that has proper regard for the role of transport and mobility in achieving national and local policy goals. This is especially crucial for carbon mitigation in a rural authority.
- Reinstatement of a commitment to ensuring that the plan seeks to provide “*a front door for everyone*” within the vision or the strategic objectives.

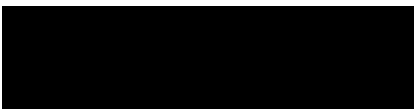
- Identification of a spatial strategy that is more ambitious in delivering new homes swiftly in locations which by virtue of the highest possible quality of active travel and public transport provision, ensure that development is as sustainable as possible;
- Basing the settlement hierarchy purely on a crudely defined 20-minute neighbourhood concept fails to properly inform the future spatial distribution of development throughout the District and distorts the analysis of where the most sustainable options for development are likely to arise;
- Conform with the principles established in NPPF and PPG to ensure that the Standard Methodology is indeed the starting point to arrive at the minimum figure, and recognising that the required quantum of housing may well need to increase beyond that level given affordability pressures and the need to accommodate some need from PFSH in particular.
- In the context of East Hampshire, a range of sites of up to about 2000 dwellings is likely present the best opportunity to deliver affordable homes and new infrastructure, with the largest allocation likely to cluster to 1300-1600 units.
- None of the Spatial Strategy Options is evidence based sufficient to arrive at a preferred approach.
- Rather an approach that has full and proper regard to both local self-containment and also the key inter-urban movement corridors that allow for a regular and direct public transport offer, is most likely to achieve the Vision objectives, and also conform to the requirements set out both in NPPF and wider national policy. A rigorous approach to 20-minute neighbourhoods being a 10 minute walking radius, nevertheless is an important articulating principle. This should sit alongside the identification of key public transport corridors, where there should be a presumption that further service improvements should be achieved to support wider mode shift and maximise the synergy between existing and new travel demands.

As previously, Stagecoach remains ready to assist East Hampshire officers and Hampshire County Council as Local Highways and Transport Authority respectively, to support the local plan process with all the resources that it can reasonably devote, in what remain challenging operating and commercial circumstances for this business and wider industry.

Please direct your queries to the undersigned in the first instance, representing Stagecoach South.



c/o Stagecoach West  
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 65 London Road  
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 GL1 3HF



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Planning Policy Team,  
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**Environment, Transport  
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Directorate**

**Third Floor,  
Quadrant Court,  
35 Guildford Road,  
Woking  
GU22 7QQ**

Sent by email to: [localplan@easthants.gov.uk](mailto:localplan@easthants.gov.uk)

12 January 2023

Dear Sir or Madam,

### **East Hampshire Key Issues and Priorities Consultation**

Thank you for consulting Surrey County Council (SCC) on the key issues and priorities that should be addressed in the new East Hampshire Local Plan 2021 to 2040. This is an officer response reflecting the council's role as the responsible authority for Surrey for highways and transport, education, minerals and waste planning and as the Lead Local Flood Authority.

Our comments in response to this consultation are set out under the relevant headings below and should be read alongside our letters to you dated 19 March 2019 and 15 October 2019, both attached as an annex to this letter.

#### **Highways and Transport Issues**

We note the comment that the road network is struggling to cope at particular locations. Surrey County Council approved a new Local Transport Plan 4 in July 2022. The plan sets out county-wide policies on reducing traffic emissions in order to help meet the county's commitment to becoming net zero by 2050. In our previous responses we commented that we were concerned about proposed allocations close to the Surrey boundary and the impact on traffic flows on the A325 and A31. The potential cross boundary impacts should be assessed prior to any allocations in the North East area of the district being taken forward in the next iteration of the Local Plan. We stated that it would be important to engage with other authorities with an interest in the provision of transport infrastructure to meet the needs of any proposed development, including National Highways, Hampshire County Council and Waverley Borough Council and it would be useful if the district could coordinate joint discussions at an appropriate stage in the process of progressing the plan.

Depending on the sites which are allocated consideration will need to be given to potential mitigation measures. Any transport schemes should be included in the infrastructure schedule of the Infrastructure Delivery Plan with a requirement for appropriate developer contributions towards funding these schemes.

**Education Issues**

In our previous response we commented that any proposed development in East Hampshire may impact on secondary schools in the Farnham and Haslemere areas. Hampshire County Council, as the Local Education Authority, would be best placed to comment on any need for additional school places and we would welcome further discussion with your officers as the plan develops.

**Minerals and Waste Issues**

We previously made comments relating to the Alton Road Sandpit. As the neighbouring MPA, we would be concerned by any residential development within close proximity to the Alton Road Sandpit that could comprise a threat to the operation of this existing site.

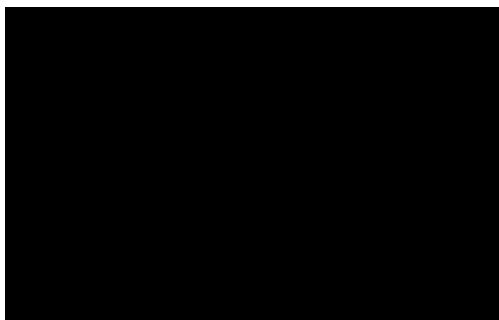
**Environment**

It is good to see highlighted that trees and other green infrastructure could play an important role in reducing flood risks.

Page 44 relates to Green Infrastructure. We would encourage the consideration of Green-Blue infrastructure, as green spaces can be multifunctional.

We trust that the above comments are helpful. If you require further information, please contact [REDACTED] by email at [REDACTED]

Yours sincerely,

A large black rectangular redaction box covering the signature area.

**Tel:** 020 8541 9453

**Email:** [Planning.consultations@surreycc.gov.uk](mailto:Planning.consultations@surreycc.gov.uk)



Planning Policy Team  
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***Highways Transport and  
Environment Directorate***

**Spatial Planning Team  
Surrey County Council  
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Kingston upon Thames  
KT1 2DN**

Sent by email to: [localplan@easthants.gov.uk](mailto:localplan@easthants.gov.uk)

15 October 2019

Dear Sir/Madam

**East Hampshire Draft Local Plan 2017-2036 Large Development Sites Consultation**

Thank you for consulting Surrey County Council on the East Hampshire Draft Local Plan 2017-2036 (Regulation 18).

Our comments in response to this consultation are set out under the relevant headings below and should be read alongside our letter to you dated 19 March 2019, sent in response to the earlier consultation on the East Hampshire Draft Local Plan 2017-2036, attached as an annex to this letter.

**Highways and Transport Issues**

In relation to highways and transport issues, each of the currently proposed large sites are, to a greater or lesser extent, likely to impact on the A31 in Surrey. The proposed allocations at Northbrook Park and at Whitehill and Borden are closest to the Surrey boundary, and therefore we remain concerned about the potential for the development of these sites to impact on traffic flows on the A325 and A31.

In our previous response, we expressed our view that these potential impacts should be assessed prior to being taken forward in the next iteration of the Local Plan. It is understood that some baseline modelling work has been undertaken to assess the impacts of the proposed sites on roads within the borough and that it is intended to extend this work to assess the cross boundary impacts to inform the next Regulation 19 Local Plan consultation. We anticipate that further extension of this work will identify appropriate measures to resolve any cross boundary impacts. We hope that particular consideration will be given to jointly promoting any appropriate schemes that have been included with the Waverley Local Plan, including those relating to bus service provision.

It will be important to engage with other authorities with an interest in the provision of transport infrastructure to meet the needs of the proposed new development, including Highways England, Hampshire County Council and Waverley Borough Council and it

would be useful if the District Council could coordinate joint discussions at an appropriate stage in the process of progressing the plan.

We would reiterate our expectation, expressed in our previous letter, that in the event of either the site at Northbrook or Whitehill and Borden being allocated, consideration will be given to promoting the Wrecclesham by-pass scheme as a potential mitigation measure along with the Hickleys Corner underpass scheme.

It is considered that any transport schemes necessary to ensure that the impacts of proposed new development are acceptable should be included in the infrastructure schedule of the Infrastructure Delivery Plan. These requirements should also be set out within the site related policies of the Local Plan to ensure that appropriate developer contributions are secured towards funding these schemes.

### **Education Issues**

We are aware that the proposed development may also impact on secondary schools in the Farnham and Haslemere areas. We would therefore welcome further discussion with your officers, along with Hampshire County Council as the Local Education Authority, to clarify how additional need in these areas is intended to be met.

### **Minerals and Waste Issues**

We previously made comments relating to the Alton Road Sandpit. This site is now operational under the permission for the extraction of sand (770,000 tonnes) and clay (512,000 cubic metres) from a site of 36.2 ha; filling of existing and resultant void with (2.6 million cubic metres) non-hazardous industrial, commercial, household and inert waste; installation of plant and equipment; alterations to existing site access onto A31; and comprehensive restoration of the site over a period of 11.5 years without compliance with Condition 1 of planning permission ref. WA99/0223 to allow the development to be completed in all respects no later than 31 December 2029.

As the neighbouring MPA, we would be concerned by any new residential development within close proximity to the Alton Road Sandpit site that could comprise a threat to the operation of this existing site, which is vital to the supply of soft sand in Surrey and the wider south east region. It would typically be considered, in accordance of paragraph 182 of the NPPF, that the plan making authority, as 'the agent of change' in promoting this development, must ensure that suitable mitigation can feasibly be delivered to safeguard the future operation of the quarry.

If you have any queries, please do not hesitate to contact [REDACTED]

Yours sincerely  
[REDACTED]



**Tel:** 020 8541 9453  
**Email:** [Planning.consultations@surreycc.gov.uk](mailto:Planning.consultations@surreycc.gov.uk)



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

***Highways Transport and  
Environment Directorate***

**Spatial Planning Team  
Surrey County Council  
County Hall  
Kingston upon Thames  
KT1 2DN**

Sent by email to: [localplan@easthants.gov.uk](mailto:localplan@easthants.gov.uk)

19 March 2019

Dear Sir/Madam

**East Hampshire Draft Local Plan 2017-2036 Consultation**

Thank you for consulting Surrey County Council on the East Hampshire Draft Local Plan 2017-2036 (Regulation 18). We have comments to make as the highways and transport and as the minerals and waste planning authorities for Surrey. Our comments are set out under the relevant headings below.

**Surrey highways and transport authority comments**

Our highways and transport concerns mainly relate to the proposed allocation of Site SA21 Northbrook Park for a new settlement comprising a minimum of 800 dwellings. We also have concerns about the additional 1,534-1794 dwellings proposed for allocation in Whitehill Bordon.

We welcome the statement in the IDP that the council will work with us, as a neighbouring authority, to determine the transport infrastructure improvements required to support the delivery of the allocated sites proposed in the Draft Local Plan, and we note the specific reference to these two sites. Both have the potential to generate significant increases in traffic on the already overstretched network of the A325, through Wrecclesham, and on the A31 Farnham Bypass. We consider that the transport impacts of these proposed allocations should be assessed prior to their being finalised in the next iteration of the Local Plan. They will of course be subject to a full Transport Assessment at the planning application stage. It is expected that the measures necessary to mitigate the impacts of additional traffic on the A325/A31 around Farnham will be appropriately funded by developer contributions.

We fully support the aspiration in the Local Plan for new homes to be “directed to the most sustainable and accessible locations in the area”, however, it is our view that seeking to meet a significant proportion of the District’s housing needs at Northbrook Park will not achieve this objective.

In terms of sustainable transport considerations, the Northbrook Park site is equidistant between Bentley and Farnham stations and it is questionable as to whether any form of bus connection to these stations could be economically viable. Bentley offers services northbound and the only destination possible southwards is Alton. In addition, the access

to Bentley station is via single track lanes. To reach places such as Basingstoke and Winchester by rail from Bentley, would mean driving to Farnham, where there is limited opportunity for parking, or further afield.

The Local Plan intention to concentrate additional growth in “locations that can provide supporting infrastructure and facilities provides better opportunities for reducing the reliance on the private car” is fully supported. However, it is considered that securing a sustainable transport solution for a development site in this location will be challenging, particularly for a settlement of this relatively modest size. The achievement of a modal shift away from the private car is considered likely to require dedicated cycle routes to Farnham, Wrecclesham and Bentley alongside bus services provided in perpetuity.

It is noted that the proposed allocation for 800 homes to be provided on the Northbrook Park site is a minimum figure. A larger site could potentially achieve greater connectivity with Farnham and would help to make public transport solutions more viable, such as the provision of a bus service in perpetuity. It could also help to increase the site’s self-reliance in supporting a greater range of facilities such as shops and schools to be provided on-site. This would reduce the need for travel between the site and surrounding towns. However, the creation of an entirely self-reliant site would require expansion of the existing proposals on a massive scale and a substantial investment in transport infrastructure to eliminate any significant impact on Surrey’s surrounding roads.

Significant increases in traffic and congestion in Wrecclesham would be likely to result from the development proposed in the draft Local Plan at Northbrook. Therefore, should the Local Planning Authority decide to pursue the proposals for a strategic allocation for 800 homes or more, the provision of a relief road will be needed to mitigate the impacts on the community in Wrecclesham. It is envisaged that the route for the relief road would link into the A31 at the point of the Northbrook new community. Similarly, the proposed extension to the Whitehill – Bordon settlement is additionally likely to add to congestion in this area. Developer funding from both the Northbrook site as well as from any further expansion of Whitehill Bordon would therefore be expected to make a substantial contribution to the Wrecclesham relief road scheme and also towards improvements on other sections of road including the junction at Hickley’s Corner in Farnham.

#### **Surrey minerals and waste planning authority comments**

The proposed site allocation at Northbrook Park borders both Alton Road Sandpit and the Minerals Safeguarding Area (MSA) for soft sand that surrounds Alton Road Sandpit, to the east and south east. Both the boundary of Alton Road Sandpit and the soft sand MSA can be viewed on our Minerals and Waste Safeguarding Online Map Viewer tool, accessible from our website.

Whilst we do not wish to raise an objection to the allocation of this site for future development, we would seek to raise your awareness regarding the activities within close proximity to the site. Alton Road Sandpit has permission for the extraction of sand (770,000 tonnes) and clay (512,000 cubic metres) from a site of 36.2 ha; filling of existing and resultant void with (2.6 million cubic metres) non-hazardous industrial, commercial, household and inert waste; installation of plant and equipment; alterations to existing site access onto A31; and comprehensive restoration of the site over a period of 11.5 years without compliance with Condition 1 of planning permission ref. WA99/0223 to allow the development be completed in all respects not later than 31 December 2029. As of 1<sup>st</sup> of March 2019, working of the mineral has not yet commenced at Alton Road Sandpit.

If you have any queries, please do not hesitate to contact [REDACTED]

Yours sincerely

[REDACTED]



East Hampshire Council  
Issued via email:  
localplan@easthants.gov.uk

1<sup>st</sup> Floor West  
Clearwater Court  
Vastern Road  
Reading  
RG1 8DB

12 January 2023

## East Hampshire Local Plan Issues and Priorities Consultation

Dear Sir/Madam,

Thank you for allowing Thames Water Utilities Ltd (Thames Water) to comment upon the above.

As you will be aware, Thames Water Utilities Ltd (Thames Water) are the statutory sewerage undertaker for the majority of the District (water is supplied by South East Water) and are hence a “specific consultation body” in accordance with the Town & Country Planning (Local Planning) Regulations 2012. We have the following comments:

### **General Sewerage/Wastewater [and Water Supply] Infrastructure Comments**

Thames Water seeks to co-operate and maintain a good working relationship with local planning authorities in its area and to provide the support they need with regards to the provision of sewerage/wastewater treatment [and water supply] infrastructure.

Water and wastewater infrastructure is essential to any development. Failure to ensure that any required upgrades to the infrastructure network are delivered alongside development could result in adverse impacts in the form of internal and external sewer flooding and pollution of land and water courses and/or low water pressure.

A key sustainability objective for the preparation of Local Plans and Neighbourhood Plans should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 20 of the revised National Planning Policy Framework (NPPF), 2021, states: “*Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for... infrastructure for waste management, water supply, wastewater...*”

Paragraph 11 states: “*Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that:*

*a) All plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects”*

Paragraph 28 relates to non-strategic policies and states: “*Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure...*”

Paragraph 26 of the revised NPPF goes on to state: “*Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary....*”

The web based National Planning Practice Guidance (NPPG) includes a section on ‘water supply, wastewater and water quality’ and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs. The introduction to this section also sets out that “*Adequate water and wastewater infrastructure is needed to support sustainable development*” (Paragraph: 001, Reference ID: 34-001-20140306).

It is important to consider the net increase in water and wastewater demand to serve the development and also any impact that developments may have off site, further down the network. The new Local Plan should therefore seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Thames Water will work with developers and local authorities to ensure that any necessary infrastructure reinforcement is delivered ahead of the occupation of development. Where there are infrastructure constraints, it is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades take around 18 months and Sewage Treatment & Water Treatment Works upgrades can take 3-5 years.

The provision of water treatment (both wastewater treatment and water supply) is met by Thames Water’s asset plans and from the 1st April 2018 network improvements will be from infrastructure charges per new dwelling.

As from 1st April 2018, the way Thames Water and all other water and wastewater companies charge for new connections has changed. The changes mean that more of Thames Water’s charges will be fixed and published, rather than provided on application, enabling you to estimate your costs without needing to contact us. The services affected include new water connections, lateral drain connections, water mains and sewers (requisitions), traffic management costs, income offsetting and infrastructure charges.

Information on how off site network reinforcement is funded can be found here <https://developers.thameswater.co.uk/New-connection-charging>

Thames Water therefore recommends that developers engage with them at the earliest opportunity (in line with paragraph 26 of the revised NPPF) to establish the following:

- The developments demand for Sewage/Wastewater Treatment and network infrastructure both on and off site and can it be met; and
- The surface water drainage requirements and flood risk of the development both on and off site and can it be met.

Thames Water offer a free Pre-Planning service which confirms if capacity exists to serve the development or if upgrades are required for potable water, waste water and surface water requirements. Details on Thames Water’s free pre planning service are available at: <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity>

In light of the above comments and Government guidance we consider that the New Local Plan should include a specific policy on the key issue of the provision of water and sewerage/wastewater infrastructure to service development. This is necessary because it will not be possible to identify all of the water/sewerage infrastructure required over the plan period due to the way water companies are regulated and plan in 5 year periods (Asset Management Plans or AMPs). We recommend the Local Plan include the following policy:

**PROPOSED WATER SUPPLY/WASTEWATER INFRASTRUCTURE POLICY TEXT:**

***“Where appropriate, planning permission for developments which result in the need for off-site upgrades, will be subject to conditions to ensure the occupation is aligned with the delivery of necessary infrastructure upgrades.”***

***“The Local Planning Authority will seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Developers are encouraged to contact the water/waste water company as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Where there is a capacity constraint the Local Planning Authority will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development.”***

Local Authorities should also consider both the requirements of the utilities for land to enable them to meet the demands that will be placed upon them. This is necessary because it will not be possible to identify all the water and wastewater/sewerage infrastructure required over the plan period due to the way water companies are regulated and plan in 5 year periods (AMPs). Thames Water are currently in AMP7 which covers the period from 1st April 2020 to 31st March 2025. AMP8 will cover the period from 1st April 2025 to 31st March 2030. The Price Review, whereby the water companies’ AMP8 Business Plan will be agreed with Ofwat during 2024.

Hence, a further text should be added to Policy as follows:

***“The development or expansion of water supply or waste water facilities will normally be permitted, either where needed to serve existing or proposed development in accordance with the provisions of the Development Plan, or in the interests of long term water supply and waste water management, provided that the need for such facilities outweighs any adverse land use or environmental impact that any such adverse impact is minimised.”***

### **Development within the vicinity of Sewage Treatment Works and Sewage Pumping Stations**

The new Local Plan should assess impact of any development within the vicinity of existing sewage works/sewage pumping stations in line with the Agent of Change principle set out in the NPPF, paragraph 187.

Where development is being proposed within 800m of a sewage treatment works or 15m of a sewage pumping station, the developer or local authority should liaise with Thames Water to consider whether an odour impact assessment is required as part of the promotion of the site and potential planning application submission. The odour impact assessment would determine whether the proposed development would result in adverse amenity impact for new occupiers, as those new occupiers would be located in closer proximity to a sewage treatment works/pumping station.

Paragraph 174 of the NPPF, February 2021, sets out that: “*Planning policies and decisions should contribute to and enhance the natural and local environment by: ...e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans...*”

Paragraph 185 goes on to state: “*Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development....*”

The online PPG states at Paragraph: 005 Reference ID: 34-005-20140306 that: “*Plan-making may need to consider: ...whether new development is appropriate near to sites used (or proposed) for water and wastewater infrastructure (for example, odour may be a concern)..*”

The odour impact study would establish whether new resident’s amenity will be adversely affected by the sewage works and it would set the evidence to establish an appropriate amenity buffer. On this basis, text similar to the following should be incorporated into the Neighbourhood Plan: “When considering sensitive development, such as residential uses, close to the Sewage Treatment Works, a technical assessment should be undertaken by the developer or by the Council. The technical assessment should be undertaken in consultation with Thames Water. The technical assessment should confirm that either: (a) there is no adverse amenity impact on future occupiers of the proposed development or; (b) the development can be conditioned and mitigated to ensure that any potential for adverse amenity impact is avoided.”

### **Water Efficiency/Climate Change Comments**

The Environment Agency has designated the Thames Water region to be an area of “*serious water stress*” which reflects the extent to which available water resources are used. Future pressures on water resources will continue to increase and key factors are population growth and climate change. On average our customers each use 30% more water than they did 30 years ago. Therefore water efficiency measures employed in new development are an important tool to help us sustain water supplies for the long term.

Water conservation and climate change is a vitally important issue to the water industry. Not only is it expected to have an impact on the availability of raw water for treatment but also the demand from customers for potable (drinking) water. Therefore, Thames Water support the mains water consumption target of 110 litres per head per day (105 litres per head per day plus an allowance of 5 litres per head per day for gardens) as set out in the NPPG (Paragraph: 014 Reference ID: 56-014-20150327) and support the inclusion of this requirement in Policy.

Thames Water promote water efficiency and have a number of water efficiency campaigns which aim to encourage their customers to save water at local levels. Further details are available on our website via the following link:

<https://www.thameswater.co.uk/Be-water-smart>

It is our understanding that the water efficiency standards of 110 litres per person per day is only applied through the building regulations where there is a planning condition requiring this standard (as set out at paragraph 2.8 of Part G2 of the Building Regulations). As the Thames Water area is defined as water stressed it is considered that such a condition should be

attached as standard to all planning approvals for new residential development in order to help ensure that the standard is effectively delivered through the building regulations.

Within Part G of Building Regulations, the 110 litres/person/day level can be achieved through either the 'Calculation Method' or the 'Fittings Approach' (Table 2.2). The Fittings Approach provides clear flow-rate and volume performance metrics for each water using device / fitting in new dwellings. Thames Water considers the Fittings Approach, as outlined in Table 2.2 of Part G, increases the confidence that water efficient devices will be installed in the new dwelling. Insight from our smart water metering programme shows that household built to the 110 litres/person/day level using the Calculation Method, did not achieve the intended water performance levels.

We therefore consider that text in line with the following should be included in the Local Plan: ***“Development must be designed to be water efficient and reduce water consumption. Refurbishments and other non-domestic development will be expected to meet BREEAM water-efficiency credits. Residential development must not exceed a maximum water use of 105 litres per head per day (excluding the allowance of up to 5 litres for external water consumption) using the ‘Fittings Approach’ in Table 2.2 of Part G of Building Regulations. Planning conditions will be applied to new residential development to ensure that the water efficiency standards are met.”***

### **Flood Risk & Sustainable Drainage Comments**

In relation to flood risk, the National Planning Practice Guidance (NPPG) states that a sequential approach should be used by local planning authorities in areas known to be at risk from forms of flooding other than from river and sea, which includes "Flooding from Sewers".

When reviewing development and flood risk it is important to recognise that water and/or sewerage infrastructure may be required to be developed in flood risk areas. By their very nature water and sewage treatment works are located close or adjacent to rivers (to abstract water for treatment and supply or to discharge treated effluent). It is likely that these existing works will need to be upgraded or extended to provide the increase in treatment capacity required to service new development. Flood risk sustainability objectives should therefore accept that water and sewerage infrastructure development may be necessary in flood risk areas.

Flood risk policies should also make reference to 'sewer flooding' and an acceptance that flooding can occur away from the flood plain as a result of development where off site sewerage infrastructure and capacity is not in place ahead of development.

With regard to surface water drainage it is the responsibility of the developer to make proper provision for drainage to ground, watercourses or surface water sewer in accordance with the drainage hierarchy. It is important to reduce the quantity of surface water entering the sewerage system in order to maximise the capacity for foul sewage to reduce the risk of sewer flooding.

Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to SuDS that limits as far as possible the volume of and rate at which surface water enters the public sewer system. By doing this, SuDS have the potential to play an important role in helping to ensure the sewerage network has the capacity to cater for population growth and the effects of climate change.

SuDS not only help to mitigate flooding, they can also help to: improve water quality; provide opportunities for water efficiency; provide enhanced landscape and visual features; support wildlife; and provide amenity and recreational benefits.

With regard to surface water drainage, Thames Water request that the following paragraph should be included in Policy wording or supporting text: ***“It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding.”***

### **Development Options Comments**

Thames Water would welcome an opportunity to work with the planning authorities and planners/developers to ensure that the right amount of planning is put in ahead of the development to enable the required infrastructure capacity without causing any detriment to the existing system or environment. Thames Water does not reserve network or treatment capacity for specific development sites. It is the responsibility of the Local Planning authority to prioritise development.

As such, we would welcome more details on the proposed developments when they become available and also an early contact from the developers. A consideration to the potential impact on water and wastewater infrastructure should be included when promoting a development and provision for upgrades should be made, where required.

The time to deliver water/wastewater infrastructure should not be underestimated. It can take 18 months – 3 years for local upgrades and 3 – 5 years plus for more strategic solutions to be delivered. It is therefore vital that the Council and Developers work alongside Thames Water so that we can build up a detailed picture what is being built where, get confidence of when that development is going to start and what the phasing of that development will be.

To support this Thames Water offers a Free pre planning service where developer can engage Thames water to understand what if any upgrades will be needed to serve the development where and when.

Link here > <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity>

We recommend developers attach the information we provide to their planning applications so that the Council and the wider public are assured water and waste matters for the development are being addressed.

### **Potential Development Sites**

The sites shaded blue on the plans below are currently retained operational land, but could potentially be made available for redevelopment:

#### **1. Land at Bordon Sewage Treatment Works, Canes Lane, Lindford, Bordon GU35 0RP**

The STW and land shaded blue below is well related to the settlement of Lindford and would therefore represent a sustainable development location and we would be willing to work with the council to review the feasibility of this.

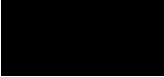




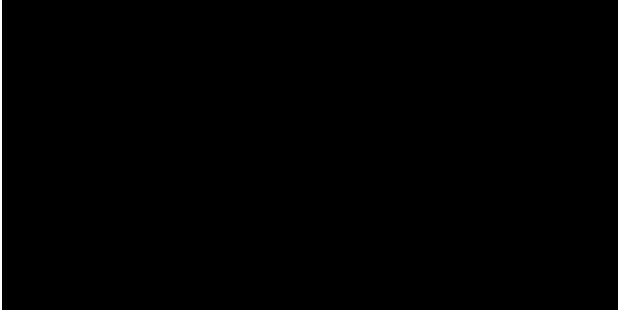
## 2. Land at Alton STW, Waterbrook Road, Alton GU34 2UD

The STW and land shaded blue below is well related to the settlement of Alton and would therefore represent a sustainable development location for industrial/employment development and we would be willing to work with the council to review the feasibility of this.



We trust the above is satisfactory, but please do not hesitate to contact  on the above number if you have any queries.

Yours faithfully,



Sent by email:  
[localplan@easthants.gov.uk](mailto:localplan@easthants.gov.uk)

Calls may be recorded for training or monitoring  
Date: 11th January 2023

Dear Sir/Madam,

### **East Hampshire Local Plan 2021- 2040. Issues and Priorities Regulation 18**

Thank you for the opportunity to comment on the above. Waverley wishes to make the following comments.

#### Cross Boundary Issues

The Council agrees that the strategic cross boundary issues that are set out in your Duty to Cooperate Framework 2022 remain relevant.

- Meeting identified housing needs within the District and wider unmet housing needs
- Meeting the identified need for Gypsy, Traveller and Travelling Showpeople accommodation within the District and wider unmet needs
- Consideration of the potential need for transit accommodation for Travellers (with regards to travelling routes across districts/boroughs).
- Transport impacts and mitigation from proposed development
- Responding to the Climate Change Emergency.
- Flood risk (from all sources)
- Mitigation strategy for the Wealden Heaths Phase II SPA
- Infrastructure requirements and provision; particularly in relation to education, health, drainage, wastewater and water supply

#### Issue – The Climate Emergency

Waverley Borough Council declared a climate emergency in 2019 and aims to become a net-zero carbon Council by 2030. The Council considers that climate change mitigation and adaptation should be at the heart of preparing a development plan to contribute to meeting environmental and sustainability objectives. Therefore, Waverley supports East Hampshire's proposals for its local plan to tackle climate change and avoid any net increase in greenhouse gas emissions from development. It supports the proposal to ensure that new development adheres to the energy hierarchy.

#### Issue – Population and Housing

Like East Hampshire, Waverley is looking to see what the changes to national planning policy set out in the government's consultation in December 2022 will have for setting its housing requirement in its Local Plan. It appreciates that these will have implications for plan making that cannot be fully identified at the moment.

It is not clear from your consultation paper whether the East Hampshire Local Plan is looking to provide the 115 homes to meet the needs of the part of your district that lies within the South Down Nations Park area within the rest of your district. However, whether East Hampshire does or does not, Waverley considers that it will not be able to meet any unmet housing needs from neighbouring local authorities.

As you are aware Waverley is currently in the process of reviewing its Local Plan Part 1 (LPP1) which sets out the strategic policies for the Borough. We are grateful for your response on 25<sup>th</sup> November 2022 to our request for you to highlight cross boundary issues so that we can consider them in our review. Whilst Waverley recognises the current uncertainty that East Hampshire and other neighbouring authorities have in meeting their assessed needs because of development constraints, Waverley is in the same position. As you will also be aware Waverley is also meeting a proportion of Woking's unmet housing need in addition to its assessed housing needs in our adopted LPP1. Therefore, at this stage Waverley considers that the East Hampshire Local Plan should consider meeting all its own housing needs.

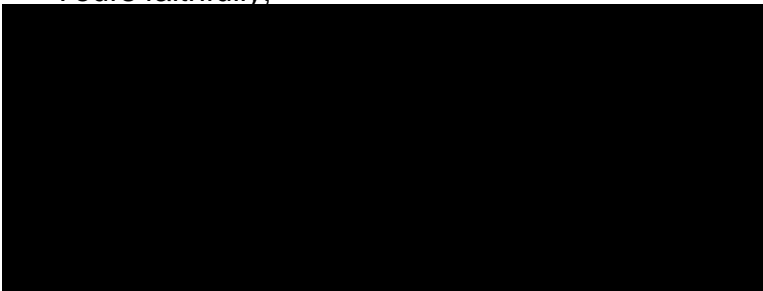
#### Options for the distribution of new housing

As stated above, Waverley supports climate change being at the heart of preparing your Local Plan. However, it appreciates that each of the four high level options for locating housing brings different externalities. It recognises the challenge of balancing the need to maximise sustainable forms of transport by locating housing where facilities and services are accessible with other issues such as meeting affordable housing needs, protecting the natural and historic environment, avoiding impacts to and from planning and development constraints and ensuring that the scale of development is proportionate to the area where it is located. However, without more detail on proposals including what the cross-boundary impacts would be from each of the options, Waverley is not able to comment on them.

As this is a high-level consultation, these are general comments. Waverley considers that it would be more appropriate to set out detailed comments through future consultations on your local plan once specific proposals have been prepared.

This is an officer response prepared in liaison with the Council's Portfolio Holder for Planning and Development.

Yours faithfully,



# Local Plan Consultation Questions

## OVERVIEW

### **Consultation question**

OV1 Please rank these key issues and priorities in order of importance to you.

Climate Emergency / Population and Housing / Types of Housing Needs / Environment / Infrastructure

Infrastructure

Population

Types of housing needs

Environment

Climate Emergency

## VISION

### **Consultation Question**

VIS1 How do you feel about this vision?

Unsure

VIS2 Does the vision cover the key matters of importance that the Local Plan can influence and inform?

Not all, key information regarding infrastructure missing

VIS2a If no, please tell us what is missing from the vision and why this is important

No set targets for key points in the timeline.

VIS3 Should the vision be more specific about areas of the District being planned for through the Local Plan?

Yes

VIS3a Please explain your answer.

Local residents want to know exactly what is happening in there area, not the whole district.

## THE CLIMATE EMERGENCY

### **Consultation questions**

CLIM1 Do you agree that the new development should avoid any net increase in greenhouse gas emissions, wherever practicable.

Yes

CLIM2 Please rank the statements in order of importance to you.

- That the construction of new buildings should use less fossil fuels and more recycling of materials
- That every new development should have renewable energy provision and that any wind or solar development must be in-keeping with the locality and its surroundings
- That climate change policy should clearly identify the impacts on water availability, with water consumption being reduced in new developments, including by reusing it on site

- That trees and other green infrastructure could play an important role in reducing flood risks

Though, all equally important

CLIM 3 Do you agree that the Council should define 'net-zero carbon development' in this way?

If possible.

CLIM 3a If you answered 'no', how should the definition be improved?

If they can define net-zero then this should happen

CLIM4 In the future, should the Council's policies on the design of new buildings focus more strongly on tackling climate change in accordance with the energy hierarchy?

Yes

CLIM4a If you answered 'no', how should we balance the design of new buildings with the need to tackle climate change?

N/A

### **Consultation question**

CLIM5 Should the detailed criteria for tackling climate change be specified:

- In the emerging East Hampshire Local Plan
- In future Neighbourhood Plans
- In local design codes
- 

Yes

CLIM 5a Please can you explain your answer

A clear set of targets to tackle climate change should be detailed in the local plan

### **Consultation question**

CLIM6 How do you feel about the idea of living locally to influence the locations of new homes?

As long as the appropriate infrastructure is in place i.e., decent transport links.

CLIM6a Please explain your response.

Living locally will only work for residents if they have everything they need on their doorstep or can travel easily to shops for groceries and consumer goods.

## **POPULATION AND HOUSING**

### *Housing Numbers*

#### **Consultation questions**

POP1 How do you think we should proceed:

- Use the standard method for calculating housing need as the basis for determining the requirements against which the five-year housing land supply and Housing Delivery Test are measured
- Further explore whether exceptional circumstances exist to be able to devise a revised local housing requirement

POP1a Please explain your answer

Gives flexibility to the local plan.

POP2 Are there any strong reasons not to use the housing need figure of 517 new homes per year for the local plan?

Yes

Please explain your answers

Only if the appropriate infrastructure is in place. Local infrastructure must keep up with number of houses built.

### *Constraints*

POP3 Based on the above should we meet:

- All the housing needs of East Hampshire's part of the SDNP
- Some of the housing needs of East Hampshire's part of the SDNP
- None of the housing needs of East Hampshire's part of the SDNP

POP3a Please explain your answer.

Not part of SDNP

### *Unmet need of neighbouring authorities*

POP4 At present we do not know the precise amount of unmet need but we are aware of our neighbours seeking help, therefore do we:

- Offer to assist with all unmet needs, regardless of scale and location.
- Offer to assist with some unmet needs, where there may be a direct relationship with the communities of East Hampshire;

- Do not offer to assist with any requests from our neighbours.

POP4a Please explain your reasons.

Yes we should work together, this works both ways

## **TYPES OF HOUSING NEEDS**

### Older persons

HOU1 What should a specific policy on older persons accommodation include?

- A specific target in terms of numbers of homes for older persons accommodation to be delivered within the plan period

Yes

- Specific types of homes to be provided

Yes

- The location of these homes across the district

### All locations in the district

HOU1a Please explain your reasons

A mix of homes for all age groups should be built across the district

HOU2 Is there anything else that should be included in this policy

A minimum 25 per cent of the homes should be adaptable.

HOU3 Should the Local Plan include a specific policy on adaptable housing?

As above

HOU4 Should there be a requirement on large sites for a percentage of new homes to be adaptable?

A minimum 25 per cent of the homes should be adaptable.

HOU4a Please explain your reasons

All age groups should live together to build a diverse community.

### House Sizes and Mix

HOU5 Should the Local Plan include a policy to specify the percentage of smaller homes on development sites?

HOU5a If yes, should this percentage focus on:



- 1-2 bed homes

Yes

HOU6 Should a percentage of smaller homes to be provided on:

- Only large development sites (over 10 units)

Yes

HOU6a Please explain you answer

Some developments should have larger house types.

HOU7 The current requirement is that 40% of new homes on qualifying sites are affordable homes. Should the % requirement for affordable homes be:

- Increased

HOU8 Are there any other forms of housing that the Local Plan should refer to?

Mobile homes should be mentioned in the local plan

HOU8a If yes, please state what other forms of housing

Mobile homes

## **ENVIRONMENT**

### **Consultation question**

ENV1 Which of the below environmental consideration is most important to you? Please rank the below list in order of importance, from the most important to the least. Achieving improvements to local wildlife habitats;

1. Protecting the most vulnerable existing protected habitats and species;
2. Conserving the character of rural landscapes.
3. Creating better natural links between existing habitats.

## **INFRASTRUCTURE**

### **Consultation question**

INF1 What type of infrastructure is most important to you?

Transport /Health / Education / Water / Energy etc?

1. Health
2. Energy
3. Water
4. Education
5. Transport

Even though the options above are ranked 1-5 we feel they are all important.

INF2 How happy are you about the allocation of EHDC CIL funds to date.

Fairly happy

INF3 Which of these do you think provides the best outcome for infrastructures provision?

N/A

Many small sites dispersed across the district / Medium sized sites / Large Sites / A Mix of these

As outlined below medium sized sites should be dispersed across the district.

## **DEVELOPMENT STRATEGY AND SPATIAL DISTRIBUTION**

### **Consultation question**

DEV1 Please rank these options in order of preference?

- Option 1: Disperse new development to a wider range of settlements
- Option 2: Concentrate new development in the largest settlements
- Option 3: Distribute new development by population
- Option 4: Concentrate development in a new settlement

1. Concentrate new development in the largest settlements
2. Disperse new development to a wider range of settlements
3. Concentrate development in a new settlement
4. Distribute new development by population

DEV2 Why have you ranked the options in this way?

This will provide the most infrastructure required i.e., by having larger settlements we would expect that there will be more schools, transport links, shops etc.

### **Consultation question**

DEV3 Are there any alternative options we should consider?

No, this local plan can be adapted at a later date if needed.  
DEV3a If yes, please explain

N/A

## WCC Regulation 18 Local Plan Consultation response

Tue 17/01/2023 10:54

To: EHDC - Local Plan <LocalPlan@easthants.gov.uk>

**CAUTION:** This email came from outside of the council - only open links and attachments that you're expecting.

Dear Planning Policy Team,

Apologies for the delay in responding to your local Plan consultation, please find below Winchester City Council's response.

### **Winchester City Council Response to East Hampshire District Council Regulation 18 Local Plan Consultation**

Thank you for the opportunity to comment on your Regulation 18 Draft Local Plan Consultation. Winchester City Council does not have any particular comments to make in respect of the proposed areas for development, as these are unlikely to have any direct impacts on Winchester's District.

From looking at the Development Options, we note that some of the proposed development is in close proximity to the A31. In view of this it is expected that the potential for increased traffic on the A31. As this route connects both districts, we would strongly encourage you to discuss and assess any potential impact with Hampshire County Council. At this stage as we believe that this work has not been undertaken, we would like to reserve making any comments on this until we have seen the output from this work.

We note that the Local Plan has stated that large sites are those that are able to accommodate at least 600 new homes. WCC has experience of delivering a number of large sites and in our experience, a much greater quantum of houses will be needed to provide adequate / meaningful mitigation without adversely impacting on viability. In the spirit of co-operation we are happy to discuss this point with you if this would be helpful.

Winchester City Council supports the use of the standard method to calculate housing need and agree with the statement in your consultation that states East Hampshire should 'offer to assist with some unmet needs, where there may be a direct relationship with the communities of East Hampshire.'

Winchester City Council would like to see a firmer commitment to the meet the unmet housing need for the Partnership for South Hampshire need in the next draft of the Local Plan.

Kind regards,

Winchester City Council  
Colebrook Street  
Winchester, SO23 9LJ





[REDACTED]

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