



Creating communities,  
empowering lives

[Redacted]

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Ref: [Redacted]

Date: 12.1.2023

Dear [Redacted],

## RE: East Hampshire Local Plan Issues and Priorities Reg. 18 Consultation

Abri is pleased to submit representations to this consultation. As one of the largest housing providers based in the south of England with a long history in East Hampshire, we are proud to work in partnership with the Council to deliver more homes for those in need, in communities where everybody has the opportunity to belong, grow and thrive. Our comments focus on how the emerging Local Plan can best support delivery of affordable housing to meet local housing need.

### Issue: The Climate Emergency

In response to **CLIM5** we support the Local Plan setting out detailed criteria for tackling climate change, provided this is aimed at being a useful framework for designing development and flexible enough to take account of site-specific constraints and characteristics. As this particular topic now often involves requiring significant technical interventions it is appropriate that policies are set in the local plan, allowing for proposals to be subject to consistent viability testing. As set out in our comments on the Climate Change and Sustainable Construction SPD in which we set out our commitment to decarbonisation in existing and new housing development, it would not be appropriate to delegate strategic and detailed climate change-related policies with viability implications to supplementary guidance, neighbourhood plans or design codes.

The flexible approach taken to understanding 20-minute neighbourhoods within the Settlement Hierarchy background paper is broadly supported, providing a balanced view of how communities live and access services. In response to **CLIM6**, provided this flexibility is baked in to the plan, and not treated as a rigid mechanism to refuse development that may otherwise be considered necessary and sustainable, we support this concept.

### Issue: Population and Housing

The timing of the issuing of this consultation, and the Government's own proposed changes to the NPPF produce an additional challenge to responding to this section of the plan. It remains important, whether the NPPF is amended in 2023 or not, for East Hampshire District Council to plan to meet as much of the local need as possible to ensure that local people can access homes that meet their needs, affordably. We support the Council in seeking to manage affordability and in response to **POP1**

Abri (formerly known as Radlett) is a trading name of The Swaythling Housing Society Limited, a Registered Society under the Co-operative and Community Benefit Societies Act 2014 (registration number: 152378) and a registered provider with the Regulator of Social Housing (registration number: L0659). Registered office: Collins House, Bishopstoke Road, Eastleigh, Hampshire SO50 6AD.

Part of the Abri group of companies which includes Yokington Housing Group. (Yokington Housing Group is a Registered Society under the Co-operative and Community Benefit Societies Act 2014 (registration number: 7499) and a charitable registered provider with the Regulator of Social Housing (registration number: L14200) whose registered office is: Lujan Way, West IT22 1WJ.)

Authorised and regulated by the Financial Conduct Authority.

The Swaythling Housing Society Limited provides management services for subsidiaries in the Abri group. Further corporate information is available at [www.abri.co.uk](http://www.abri.co.uk)

would support the Council in applying the standard method in accordance with existing and emerging national policy. Reductions in the housing requirement will, particularly in light of continuing economic uncertainty and rising costs within development, materially affect the levels of affordable housing that can be delivered, further entrenching the housing crisis by failing to meet the very real needs of households across East Hampshire. As a Registered Provider of affordable housing we are committed to meeting need wherever we can, and we have the backing of Homes England as a Strategic Partner. With appropriate housing targets and allocations, we can do more.

In accordance with our earlier comments, in response to **POP2** we encourage the Council to maximise its housing requirement in order to meet as much of its housing need as possible. While the proposed figure of 517 homes per annum is higher than the existing local plan target the difference is marginal and possible in the context of completions across East Hampshire which averaged 630 over the last five years (reported in the 2021 AMR between 2016/17 to 2020/21).

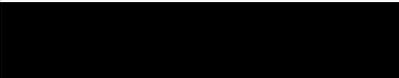
In respect of meeting neighbours' needs, including for SDNPA, an informed decision cannot be made until the respective evidence bases have been updated, but in response to **POP4** in general terms East Hampshire should aim to assist with meeting unmet need, particularly where there is a direct relationship with East Hampshire's communities.

It can be very useful for local plan policies to provide a guide to the proportions of house types that would best meet need across the local plan period. It is important however that such a guide is not set rigidly and used to the detriment of individual proposals meeting needs more specific to a local area. We would support, as proposed under **HOU5**, the inclusion of information that indicates the broad proportions of house types that will likely be acceptable to the Council in meeting need, particularly if this is shown as ranges (i.e. 20-30% rented and 30-40% affordable home ownership). For the plan to be responsive to the range of site constraints and changes over the plan period it would be preferable to limit any requirement for a percentage of smaller homes to be delivered only on large development sites (**HOU6**). Again, any requirement should be flexibly worded to allow for pragmatic responses to individual sites.

The percentage requirement for delivery of affordable housing should be set ambitiously to maximise the potential delivery of affordable housing from major development schemes. The 2021 AMR shows that the current 40% target is not being met, making clear that any change to the target will need to be viability tested to understand what can be delivered in future in light of the changing economic landscape. In response to **HOU7** we support the Council in being ambitious in target setting to best meet local needs.

Please do not hesitate to contact me if it would be helpful to discuss any of the points raised in this representation. I would be grateful if Abri is retained on your contact database for future consultations.

Yours faithfully,

  
**Abri Group**  


Ref: [REDACTED]

13 January 2023

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

***By E-mail: [localplan@easthants.gov.uk](mailto:localplan@easthants.gov.uk)***

Dear Sir/Madam

**East Hampshire Local Plan 2021-2040 – Issues and Priorities Regulation 18 – Part 1**

I write on behalf of our clients Manor Oak Homes (MOH) to provide our representations to the above consultation document. These representations are made in the context of Manor Oak Homes interest in land west of Somerset Fields, Bentley, GU10 5BF, which corresponds with the Council's Land Availability Site Ref: LAA/BEN-017.

**Background**

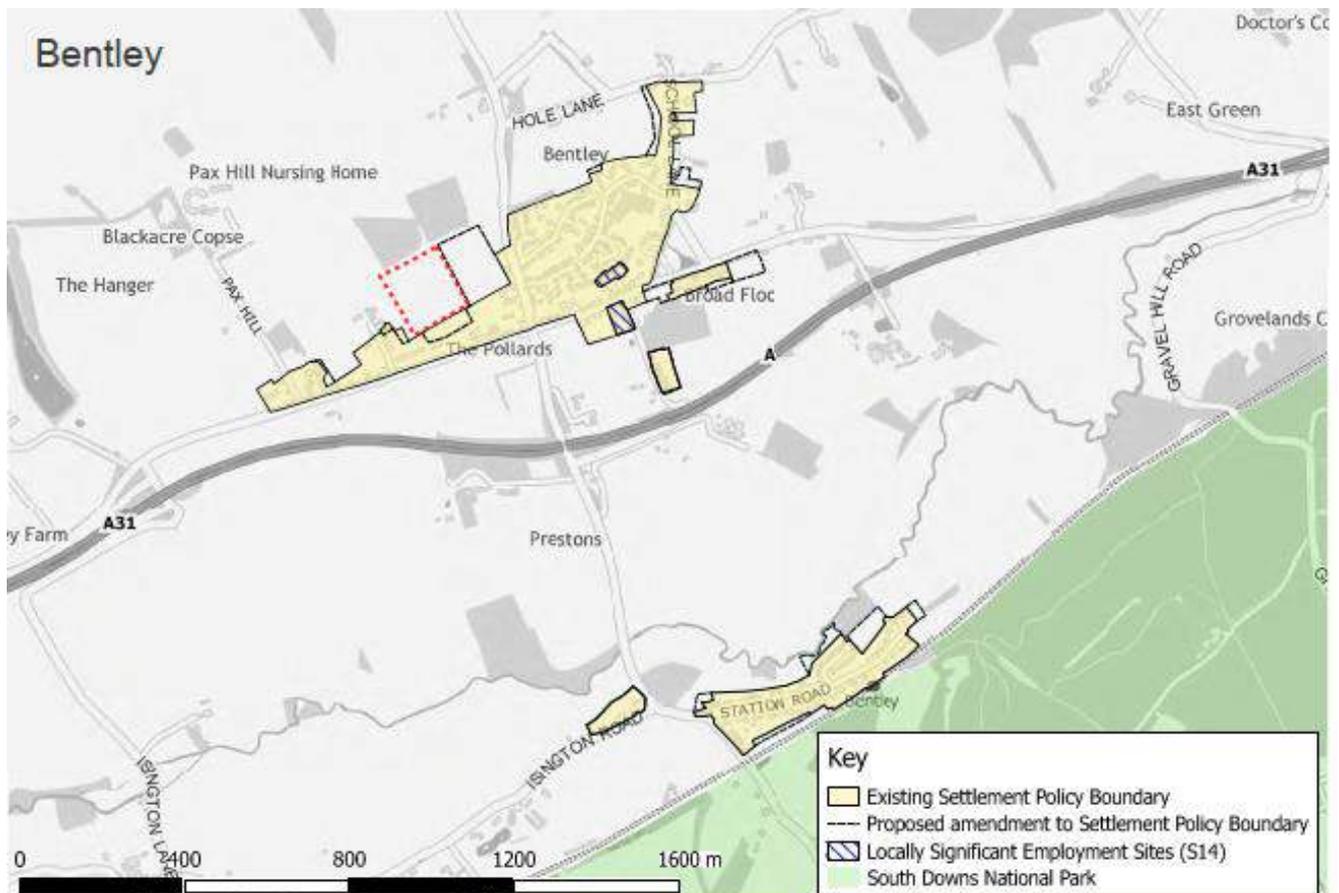
MOH act as promoters of land alongside the owners to secure viable planning permissions and have a successful track record in achieving planning permission for high quality and sustainable residential schemes. In the context of their interest in the East Hampshire Local Plan their land interests extend to approximately 2.5ha of land immediately to the west of Somerset Fields in Bentley. Somerset Fields comprises a modern completed scheme of some 37 no. homes, by Linden Homes.

In granting planning permission for that scheme under reference 55417/001 the committee report records the following:

- The site is well located for village facilities.
- Facilities provision in Bentley is good compared to other level 4 villages and it is one of the larger more sustainable village settlements, by comparison with others at that level.
- The scale of development, at 37 dwellings, would not be especially significant proportionally.

- The impact on the conservation area and neighbouring listed buildings would be neutral. It was found that heritage impacts and the impact on local character were satisfactorily mitigated by the loose and spacious form of development set around a central area of public open space, with properties set back from the southern boundary with the Conservation Area.

In acknowledging the established nature of that development, the Reg 18 Local Plan consulted upon in 2019, proposed that development to be included in a revised and extended settlement boundary. This is shown in the extract from that plan below, which shows how well our clients land relates to the remainder of the settlement. Indeed we consider the settlement boundary should be further extended around the site as an allocated housing site providing for the next phase of growth at Bentley. This is shown in the extract below with our clients land shown edged in a dotted red line, immediately west of the Linden Homes scheme and the proposed extension to the settlement policy boundary.



The eastern part of the site (c. 1ha) is the subject of a live planning application for a rural exception scheme of 12 dwellings which proposes 9no affordable homes and 3no. market homes. The application (ref. 55417/009) is pending consideration at the time of writing. The remaining land extends to around 1.5ha and is similarly available for residential development.

As accepted by the Council in their Land Availability Assessment (Nov 2022), the wider site is included as one of the developable sites which have been promoted to the Council, potentially capable of allocation to meet the Council's outstanding housing needs to 2040. The Council's Land Availability Assessment considers both parts of the site as one, noting the following features:

East Hampshire Land Availability Assessment (Nov 2022)

Site Ref	LAA/BEN-017
Site name	Land west of Hole Lane
Promoted	Residential
Capacity	37
Stage 2 Co.	Included
Suitability	Southern part of the site susceptible to surface water flooding, southern boundary adjoins Bentley Conservation Area
Area (ha)	2.45
Availability	Yes
Achievability	Yes
Timescale	0-5 years
Conclusion	Developable
Additional information	

### Representations

These representations have been prepared with regard to the parts and policies of the Local Plan, upon which MOH wishes to comment. They have been structured under relevant sub-headings and questions to correspond with the manner in which they are presented in the consultation document.

### The Plan Period (page 6)

The draft LP indicates an anticipated adoption date of 2025 with an end date for the plan period of 2040. This is intended to achieve the minimum 15 year period from adoption required by paragraph 22 of the NPPF.

It is considered that the plan period should be extended by a minimum of 2 years to 2042, with housing allocations included in the Local Plan to meet the needs of this additional 2 year period. This is due to the length of time it has taken to reach this relatively early stage in plan-making. The Council embarked on the process in 2017, some six years ago and consulted on a draft Regulation 18 Local Plan in 2019, some four years ago.

Given the delays incurred thus far it would seem sensible and appropriate on a precautionary basis to plan for an additional 2 year plan period at this stage to avoid the plan being found unsound due to being contrary to national policy. It is also important to consider this matter now to ensure sufficient homes are planned for sufficient to provide for this minimum 15 year period.

### Vision (page 11)

**The Vision statement in the consultation document states as follows:**

***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.***

**VIS1** How do you feel about this vision? (very happy / happy / neutral / unhappy /very unhappy)

Very unhappy

**VIS2** Does the vision cover the key matters of importance that the Local Plan can influence and inform? (Y/N)

No

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

The vision statement lacks a longer-term vision that looks further ahead (at least 30 years), as required by paragraph 22 of the NPPF.

More importantly however the Vision Statement represents a less ambitious approach to making sufficient provision for housing (including affordable housing). This is by comparison to its predecessor document, consulted on in 2019, and is not considered to reflect the emphasis which the NPPF places on making sufficient provision for housing needs (paragraph 20a) and significantly boosting the supply of homes (paragraph 60).

This is a particular concern in respect of issues affecting East Hampshire where the costs of new homes are extremely high and affordable housing needs acute. The Regulation 18 Local Plan published for consultation in 2019 referenced at the Foreword 'A Front Door for Everyone', its intention to provide sufficient homes for everyone. This was described as the most pressing and urgent task the Council has.

The vision statement as now worded dilutes and lacks this important objective.

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

Yes

**VIS3a** Please explain your answer.

The vision statement should include wording to reflect the importance of meeting the future development needs of the District, in particular housing needs. A suggested wording which amends the draft vision statement is set out below. Amendments are shown struck through and underlined:

***By 2040 our residents will live in healthy, accessible and inclusive communities, where a good quality homes will be provided to meet the differing needs of all our residents. These will be supported by improved local facilities and employment opportunities to provide our communities with green and welcoming places to live, work and play and respond positively to the climate emergency.***

## Issues and Priorities (page 12)

### Overview Consultation Question

**OV1 Please sort these key issues and priorities in order of preference to you**

Issue	Rank
Climate emergency	3
Environment	3
Population and housing	1
Type of housing needs	2
Infrastructure	3

It is considered that population and housing requirements are key to understanding housing needs and in turn being able to plan for sufficient housing and the right type of housing in line with NPPF paragraph 20a. Contrary to how the question is framed it is not accepted that these issues are incompatible. Planning for future development needs in a coordinated way to appropriate standards can help address environmental and climate emergency issues. What is clear in an area where median affordability ratio is recorded as being 14.51 (i.e median

house prices are 14.51 times median incomes) it is clear that addressing future housing needs, including for those unable to access the housing they need must be prioritized.

### **Population and Housing Consultation Question (pages 24/25)**

**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

It is necessary to use the standard method to comply with national policy and in turn satisfy tests of soundness.<sup>1</sup> This is the minimum approach necessary to address the significant housing needs and affordability issues surrounding housing delivery in East Hampshire where accessing housing needs is beyond the reach of a large part of the population. To explore alternative methods intent on reducing housing requirements across the plan-period would exacerbate these issues with real life consequences for those large numbers unable to access the housing they need. This is directly in conflict with the NPPF and the emphasis it places on making sufficient provision for housing<sup>2</sup> and significantly boosting the supply of homes, with the minimum number of homes informed by a local housing need assessment, conducted using the standard method.<sup>3</sup>

**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)

No

**POP2a** Please explain your answer.

The housing need figure is a recognized approach to calculating housing need which is consistent with national policy. The figure should be treated as a minimum to be exceeded where possible in order to significantly boost the supply of homes and the acute affordability issues affecting the area.

It is considered that considerably greater numbers of housing sites should be planned for in the emerging Local Plan. This will help address issues of delivery, with the Council currently unable to demonstrate a 5year housing land supply (latest published position 4.78years). It will also serve as an important safeguard in the event that the housing targets for the South Downs National Park area within East Hampshire (115dpa) are not met. This is considered to be a legitimate concern given that the National Park Authority is subject to a statutory purpose '*to conserve and enhance the natural beauty, wildlife and cultural heritage of the area.*'

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<sup>1</sup> NPPF paragraph 35

<sup>2</sup> NPPF paragraph 20a

<sup>3</sup> NPPF paragraph 60 & 61

## Issue: Type of Housing Needs

### Types of housing consultation question (page 36)

**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

The HEDNA (2022), explains that the continuation of a 40% affordable housing requirement is appropriate. It notes that the high cost of housing in the district allied to restricted supply is such that the level of affordable housing need equates to 613 affordable homes per annum. This represents 97% of projected total housing needs across the whole East Hampshire area.

When considering that affordable housing delivery has averaged at 127 affordable homes per annum or 25% of total housing completions across all sites<sup>4</sup> it is clear that increasing the affordable housing target is unrealistic and would be counterproductive. In summary an increase in the affordable housing target is expected to make housing delivery less viable across all tenures with the effect of slowing and reducing delivery when the opposite is needed.

## Development Strategy and Spatial Distribution

### Development strategy consultation question (page 61)

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

Options	Rank of preference (1 most favoured)
Option 1: Disperse new development to a wider range of settlements	1
Option 2: Concentrate 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?

East Hampshire is characterized by a wide range of settlements of differing sizes, some of which like Bentley, have access to local service provision and good public transport provision, including a main line station providing quick links to higher order centres at Alton and Farnham and further afield.

A greater focus on developable site opportunities, such as that at our clients site, LAA Site Ref. LAA/BEN-017, is important in maintaining a deliverable supply of housing sites, appropriate in scale and kind to the settlements where they are located.

Through our clients live planning application it has been established and accepted that there is an identified need for affordable housing specific to the settlement. The level of housing need exceeds that which can be delivered

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<sup>4</sup> HEDNA (2022), paragraph 5.29

via the current application. This is in addition to wider more general housing needs which exist across the District for housing of all tenures. In turn such housing will help sustain and invigorate the viability of the existing services and facilities located in these smaller scale settlements and help ensure they continue to play an important role in providing for prosperous, balanced and sustainable communities in the future.

It has been accepted by the Council that the site is developable and is of a scale which could be brought forward quickly within a 5 year period. Allocation of smaller sites like this in the emerging Local Plan will be important in maintaining confidence and certainty in future housing delivery and help ensure the Council is able to maintain a 5 year supply of deliverable housing sites. Something it is currently unable to demonstrate.

The background paper to the Regulation 18 consultation 'Settlement Hierarchy' repositions Bentley at the third tier of the settlement hierarchy, from its current position at tier 4. This is based on an updated assessment of how the respective settlements perform when measured by key services and facilities available within a 20minute or 1,200m neighbourhood area. In considering the scoring at appendix d of the Settlement Hierarchy document it is noted that Bentley receives nil credits for community hall, mainline rail station, pub, restaurant or outdoor sports facilities, despite the facilities plan (**Enclosure 1**) demonstrating that our clients site performs extremely strongly against such criteria.

This reinforces the important role which Bentley could play in meeting future housing needs.

### **Summary and Conclusions**

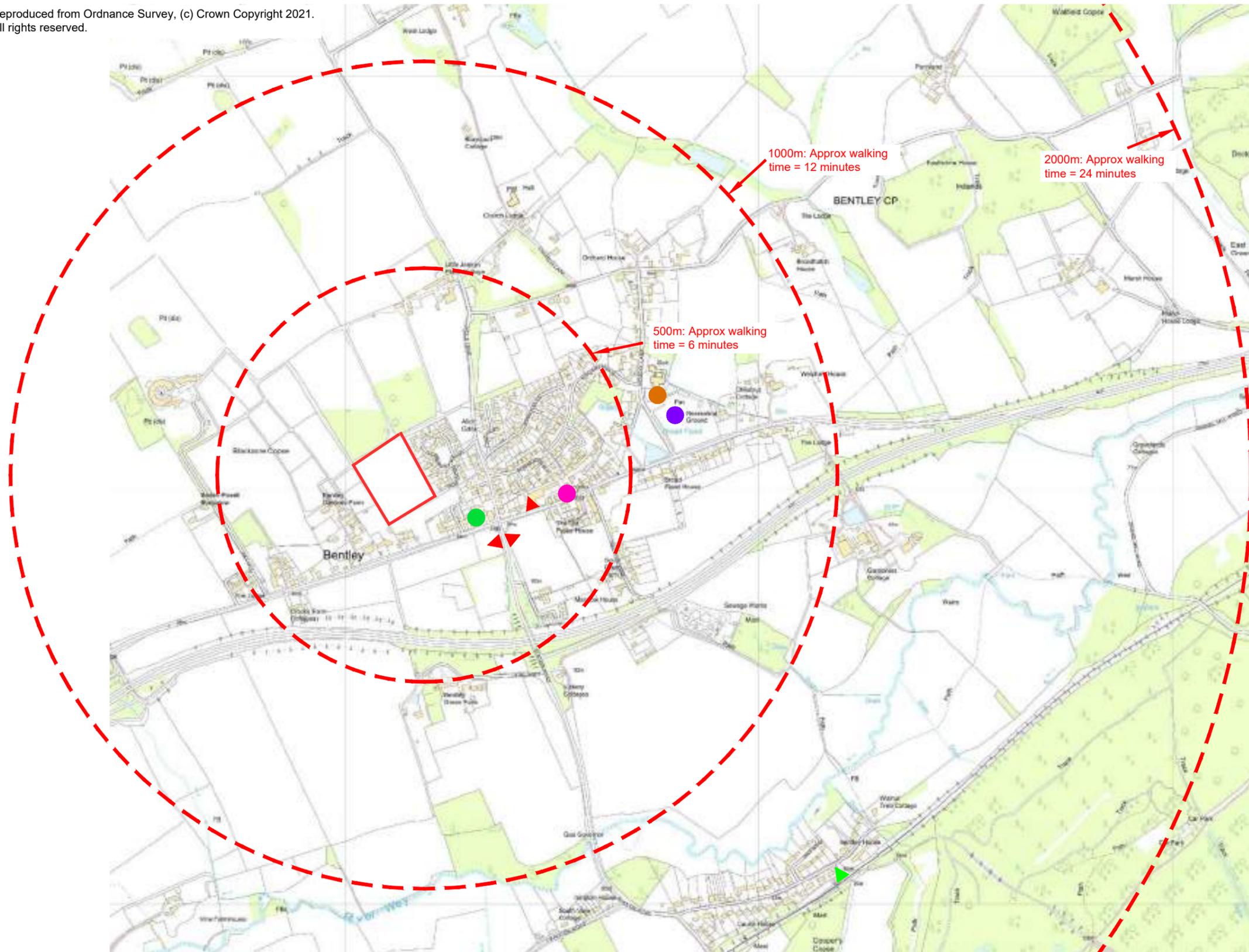
I trust that the content of this letter is clear and will be considered as the Local Plan progresses. In the event you should have any queries or require any additional information please do not hesitate to contact either myself or

Yours faithfully

### **Enclosures**

Enclosure 1 – Facilities Plan

**Enclosure 1  
Facilities Plan**



**Notes:**

1. Walking distances based on a walking speed of 1.4 m/s from 'Providing For Journeys On Foot'.
2. Actual walking distances may vary from radial distances shown.
3. Nearest of each facility / service shown only.

**Key**

- Site Boundary
- Walking distances - radial
- Primary School
- Nursey & Village Hall
- Local shops including Convenience store, Post Office, Public House, Hair dresser, takeaway
- Recreational Ground
- Bus Stops
- Railway Station



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Martin Andrews Consulting Ltd

- Transport Assessments
- Flood Risk Assessments
- Highway Advice
- Access Design
- Drainage Strategies
- Vehicle tracking

Client: Manor Oak Homes

Project: Land West of Somerset Fields  
Bentley  
Hampshire  
GU10 5BF

Title: Site Facilities Plan

11<sup>th</sup> January 2023

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

Dear Planning Policy Team,

**EHDC REPLACEMENT LOCAL PLAN – ISSUES AND PRIORITIES REGULATION  
18 – PART 1**

In response to your request for feedback on the above consultation document, on behalf of the Whitehill & Bordon Regeneration Company (WBRC) and Defence Infrastructure Organisation (DIO) we enclose a completed questionnaire form.

We have summarised some of our key points included in the questionnaire below (and also included some new points) in order to focus consideration of the matters we see as important in shaping the next local plan consultation stages as follows:

**Vision**

- A reference to sustainability would be helpful to include as would inclusion of promoting humans to flourish (particularly in a local context) – tailoring the vision more to the context of East Hampshire would also be beneficial for the 'Vision' to be less generic and more meaningful to this district and existing and future residents.

**Housing**

- A focus on creating balanced communities is needed, particularly in relation to affordable housing and also retirement living/accommodation for the elderly.
- The potential upcoming changes to the NPPF later in 2023 may impact on how EHDC has currently calculated it's housing need figures going forward, as will other potential NPPF changes to the local plan system.



## Introduction

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.

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

## 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**.

There are a series of consultation questions throughout the document and on our dedicated [digital engagement platform](#), which is easy to use and our preferred method of how to respond.

If, however, you do not have access to the internet, please use this form which simply replicates the consultation questions in the Issues & Priorities document and return 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](#).

If you need this consultation form in an alternative format, please contact us.

**If you have any questions about this form, please contact the Planning Policy Team on 01730 234102.**

**Thank you for submitting your views to this important consultation.**

**Your Details:**



Title	██████
Name	████████████████
Address	Avison Young (OBO WBRC/DIO - see attached covering letter)
	████████████████
	████████████████
Post Code	██████

The following section sets out all the consultation questions – you do not need to respond to all of them. Please use this form to answer the questions as this will ensure that we know which question you are responding to. If you choose not to use the form, please refer to the question by its identifier (e.g. VIS1) so that we can record your response correctly. If the text boxes are too small for your response, please continue on a blank piece of paper but please ensure the question number is referred to.

## Consultation Questions



### Vision

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, it 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.***

### Consultation questions

**VIS1** How do you feel about this vision? *(please circle what phrase best describes your views)*

(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? *Please indicate Yes or No*

Yes	
No	X

**VIS2a** If no, please tell us (*in the box below*) what is missing from the vision and why this is important.

VIS 1 - Neutral  
 VIS 2 - Reference to sustainability would be helpful to include as would inclusion of promoting humans to flourish in a local context.

**VIS3** Should the vision be more specific about areas of the district being planned for through the Local Plan? *Please indicate Yes or No*

Yes	X
No	

**VIS3a** Please explain your answer (*in the box below*).

Tailoring more to the context of East Hampshire would also be beneficial for the 'Vision' to be less generic and more meaningful to this district/residents.

### Overview

A lot has changed since we last consulted on the Local Plan in 2019, we are not reconsulting on many of the topics or sites previously considered – instead we are looking afresh at key issues and priorities as listed in Question OV1 below:

### Consultation question

**OV1** Please sort these key issues and priorities in order of importance to you. (*rank 1- 5 with 1 being the most important*)

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

## 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.



There has been a growing awareness that the transition to a zero-carbon lifestyle needs to happen as fast as possible. EHDC declared a climate emergency in July 2019. 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, so the Council is looking at best practice from elsewhere and taking expert advice from independent consultants.

## Consultation questions

**CLIM1** Do you agree that new development should avoid any net increase in greenhouse gas emissions, wherever practicable? *Please indicate Yes or No*

Yes	X
No	

**CLIM2** So far, you've told us the following - but what's most important to you? *(rank 1- 5 with 1 being the most important)*

What you told us...	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 in-keeping 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	4
That trees and other green infrastructure could play an important role in reducing flood risks	5



**CLIM5** Should the detailed criteria for tackling climate change be specified in any of the following: *Please tick the yes or no box you agree with*

	Yes?	No?
In the emerging East Hampshire Local Plan	X	
In future neighbourhood plans		X
In local design codes	X	

**CLIM5a** Please explain your answer. *(add your views in the box below).*

There is an opportunity for EHDC to provide evidence based policies as part of the local plan process to set out objectives/practical measures to address climate change matters.

**CLIM6** How do you feel about using the idea of living locally to influence the location of new homes? *(please circle what phrase best describes your views)*

(Very happy / Happy / Neutral / Unhappy / Very unhappy).

**CLIM6a** Please explain your response. *(add your views in the box below).*

Neutral - self contained/self sufficient communities which contain appropriate residential/employment/education/shopping/leisure/ community/health/sport/open space should assist reductions in a need to travel by creating sustainable communities in which to live work and play.

## Population and Housing

Government guidance requires local planning authorities to calculate their local housing need by using a formula known as the 'Standard Method', which uses published data sources to provide a District's annual housing need. There is a strong emphasis to using the standard method. One of the benefits is that given this is unlikely to be challenged at the local plan Examination as it is based on national published data.



This gives us an annual whole District housing need of :

<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>

The guidance continues in that in exceptional circumstances an alternative method could be used. Current data available to calculate our local housing need figure is only available at the district level and in East Hampshire there are two Local Planning Authorities – EHDC and South Downs National Park Authority. However, we have disaggregated the above for both local planning authority areas and this gives the following breakdown, which is not too dissimilar to that above:

	<b>LPA</b>	<b>National Park</b>	<b>Total</b>
<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

## Consultation questions

**POP1** How should we proceed? (*select the option you agree with*):

- 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. (*add your views in the box below*).

Any methodology will need to take account of the forthcoming changes to the NPPF.

SDNP's views on the level of housing to be accommodated in the NP will be critical.

The housing need figure for the whole district, using the Government's standard method formula is calculated as 632 homes per year. For the East Hampshire Local Plan this means the housing need is 517 homes per year.

**POP2** Are there any strong reasons not to use the housing need figure of 517 new homes per year for the Local Plan? *Please indicate Yes or No*

Yes	
No	

**POP2a** Please explain your answer. (*add your views in the box below*).

Neutral

**POP3** Should we meet: *Please select the option you agree with*

- All the housing needs of East Hampshire's part of the South Downs National Park (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. *(add your views in the box below).*

Neutral - it would seem there is currently no evidence to support SDNP not making provision to meet its housing needs.

**POP4** At present we do not know the precise amount of unmet housing need but we are aware of our neighbours seeking help, therefore do we: *Please select the option you agree with*

- 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. *(in the box below).*

Neutral at this point in time until the extent of any unmet need is identified.

## Types of Housing

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. 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.

## Consultation questions

**HOU1** What should a specific policy on older persons accommodation include? *(please 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. *(in the box below).*

We consider that all three elements above should be supported.

**HOU2** Is there anything else that should be included in this policy? *(add your views in the box below).*

In addition to older persons the evidence indicates an increase also in the number of people with a long-term health problem or disability.

**HOU3** Should the Local Plan include a specific policy on adaptable housing? *Please indicate Yes or No*

Yes	X
No	

**HOU4** Should there be a requirement on large sites for a percentage of new homes to be adaptable? *Please indicate Yes or No*

Yes	X
No	

**HOU4a** Please explain your answer. *(add your views in the box below).*

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? *Please indicate Yes or No*

Yes	X
No	

**HOU5a** If yes, should this percentage focus on (*please select one option*):

- 1-2 bed homes
- 2-3 bed homes

**HOU6** Should a percentage of smaller homes to be provided on (*please select one option*):

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

**HOU6a** Please explain your answer. (*in the box below*).

A target size mix of homes (apartments and houses) could be set out to match housing needs in identified areas - subject to there being flexibility to be able to agree a different unit mix at a planning application submission stage, if there are mitigating factors for any site, which would include site topography, viability, character of the area etc.

In terms of affordable housing as defined in [planning legislation](#), 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.

**HOU7** The current requirement is that 40% of new homes on qualifying sites are affordable homes. Should the % requirement for affordable homes be (*please select one option*):

Increased	
Decreased	
Stay the same	X

**HOU7a** Please explain your answer. *(in the box below)*

There appears no evidence to support a move away from the current 40% target - flexibility to meet that target will again be important and need to take account of such factors as viability and related matters. The inclusion of reference to First Homes will be needed within the affordable housing category/definition.

It is noted that the current target of 35% affordable housing provision in Whitehill & Bordon should also remain as there appears no evidence to support a move away from this target.

**HOU8** Are there any other forms of housing that the Local Plan should refer to?  
*Please indicate Yes or No*

Yes	
No	X

**HOU8a** If yes, please state what other forms of housing. *(in the box below)*

## 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. The key priority for the Council therefore is to continue to protect, enhance and conserve its environment.



### Consultation question

**ENV1** Which of the below environmental considerations is most important to you? (rank 1- 4 with 1 being the most important)

Environmental Consideration	Rank
Achieving improvements to local wildlife habitats;	2
Protecting the most vulnerable existing protected habitats and species;	1
Conserving the character of rural landscapes;	4
Creating better natural links between existing habitats.	3

## 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.

### Consultation questions

**INF1** What type of infrastructure is most important to you? (rank 1- 8 with 1 being the most important)

Type of Infrastructure	Rank
Transport	4
Health	1
Schools, colleges	2
Community facilities	6
Sport	8
Green spaces	3
Energy supplies and water	5
Internet and mobile phone reception	7

**INF2** How do you feel about the allocation of CIL funds to date? *(please circle what phrase best describes your views)*

Very happy / Happy / Neutral / Unhappy / Very unhappy.

**INF3** Which of these do you think provides the best outcome for infrastructure provision? *(please circle one option):*

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

**INF3a** Please explain your answer. *(in the box below)*

INF2 Neutral

INF3 - A mix of different size sites as all sites should be able to deliver wider infrastructure provision in some form.

## Development Strategy

The Council will need to find additional land for a minimum of 3,405 new homes by 2040, in addition to land for other uses such as new offices and business units.

This consultation does not identify settlements or sites for development, the focus is on exploring what's right for East Hampshire in terms of distribution of new development and how does this help us achieve our other ambitions for climate change and improving the quality of the built and natural environment.

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

## Consultation questions

**DEV1** Please rank in order of preference – (*rank 1-4 with 1 being the most important*)

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

**DEV2** Why have you ranked the options in this way? *(Please give reasons for your chosen ranking in the box below)*

A policy approach to focus future development in compact settlement patterns will help secure several benefits, including:

- Larger/more compact settlement patterns support economic productivity by reducing the travel distances between homes and jobs and making efficient use of infrastructure networks
- Settlements (patterns) with higher densities and a range of land uses promote sustainable travel to potentially play an important role in reducing transport/emissions, particularly where there is a focus on walking/cycling which in turn creates opportunities for improving public health by increasing physical activity (thereby helping to address current increases in the acerbity in, and cost of chronic lifestyle-related diseases, as recognised by such initiatives such as the designation of Healthy New Towns
- There would be additional population/spend to support local services/ facilities including shops, education and health facilities

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

Please indicate Yes or No

Yes	
No	X

**DEV3a** If yes, please explain. *(in the box below)*

## General consultation questions

**GEN1** How do you feel about this consultation? (*please circle what phrase best describes your views*)

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*).

Neutral

## Call for Sites

As part of this consultation we also have two call for sites with a focus on sites suitable for gypsy, traveller and travelling showpeople accommodation and sites which could be used for various 'green' uses. If you know of a site please submit this to us – see below:

**Please do not use this call for sites to suggest or resubmit site suggestions for housing.**

### Gypsy, Traveller and Travelling Showpeople Accommodation

**CFS1** Please describe where the land is and provide an address if possible (e.g. street name, local area, what landmarks are nearby).

Address – location of site	
Description of site	

**CFS1a** Please attach any maps or photos of the land you are suggesting to your representation.

### 'Green Sites'

**CFS2** Please describe where the land is and provide an address if possible (e.g. street name, local area, what landmarks are nearby)

Address – location of site	
Description of site	

**CFS2a** Please attach any maps or photos of the land you are suggesting to your representation.

- It would be helpful if EHDC can indicate whether these changes will impact on the current timescales to adopt a replacement Plan?
- The spatial distribution of further housing and employment to the largest settlements in the district, such as Whitehill & Bordon, is supported, as would be a distribution approach based on new development by population.

### **Housing Delivery in Whitehill & Bordon**

- For information purposes (as this is not included in the questionnaire) we note that during the last three years WBRC has overseen the delivery of c. 400 dwellings with 150 completions in the last year, 100 and 150 in the preceding two years respectively.
- Whilst this volume of delivery has fallen below expectations of 200 units a year, EHDC has recently approved (or will shortly approve) a further 650 units and there is scope to significantly increase/accelerate delivery rates going forward to assist EHDC in demonstrating a suitable housing land supply and completions.

### **Land-use planning**

- Again, not included in our questionnaire response, the inclusion of a policy to address the spatial needs for additional burial space and for demand for crematorium space should also be included, and consideration of suitable sites to be identified.

### **Walking/Cycling**

- We consider that the replacement plan should heavily focus on improving existing pedestrian/cycle networks and creating/expanding new/existing networks as a sustainable means of travel, and for recreational/leisure use/benefits.

### **Highways/Transport**

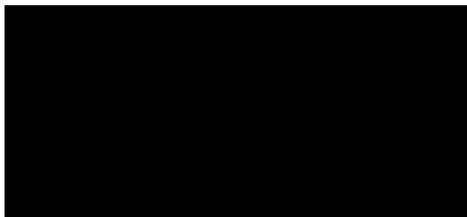
- It would seem that no updates have been undertaken to the previous replacement local plan evidence base and we look forward to being able to review when available.

### **Energy**

- A further observation not included in our questionnaire - the encouragement of solar farms as a sustainable generator of energy would be welcomed in the local plan, as would the identification of suitable sites (or by identification through site selection criteria). This would allow communities to become more self-sufficient, particularly through decentralised local energy projects, which the suitable sustainable expansion of communities and facilities /opportunities, could reduce the need to travel outside those communities.

We would welcome the opportunity to discuss our response with you and look forward to further engagement as the replacement local plan process progresses.

Yours sincerely,



**For and on behalf of Avison Young (UK) Ltd**

Date: 16 January 2023  
[REDACTED]

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

Dear Sirs,

**East Hampshire Local Plan 2021-2040  
Issues and Priorities Regulation 18 - Part 1 Consultation**

**Background**

As you may be aware from my previous correspondence with the planning policy team through the Councils Call for Sites consultation, I act on behalf of the land owners and promoters for land at Penally Farm, Liphook (LPA Ref LIP-014).



Penally Farm Site

## **Penally Farm Proposals and Benefits**

### Housing

- High quality traditional design and landscape led layout
- Broad mixture of 1, 2, 3, 4 and 5 bedroom homes
- 40% of the homes to be affordable and available for local people
- Low density of housing on a large 36 acre site
- Space for 150-225 homes meets future local housing needs

### Environment

- No housing within 400m of Special Protection Area (SPA)
- Sustainable drainage and water management on site
- Mature boundary planting retained & enhanced where possible
- Landscaped meadows buffer zone around the development
- Natural green space including pond and wildlife habitats

### Community

- Land provided for formal recreation and sports facilities
- Significant improvements to Radford Park
- New and enhanced pedestrian links into the existing network
- Open green space provided for the community (SANGS)
- Safeguarding and enhancement of Wealden Heath SPA
- Space for equipped play facilities for people of all ages

### Commercial

- Sensitive redevelopment of the existing buildings/brownfield land
- A mixture of high quality flexible office space
- A focus on start-up and incubator units up to 2,500sqm
- Live/Work units to be included in any development

### Traffic and Access

- Vehicular access in close proximity to main B2131 London Road
- Easy access onto adjoining A3, avoiding Liphook Village centre
- Only 15% of site traffic estimated to head south into Liphook
- Parking within all plots will be provided, including visitor spaces
- Less than a mile from most Liphook amenities
- Pedestrian link provided between Hewshott Lane & Radford Park
- S106 contributions towards addressing congestion in the village centre

## **Consultation Response**

### Question OV1

It is imperative that the housing crisis is given priority through the provision of the right amount and type of housing to meet the growing affordable and market housing needs of the district.

Through high standards of design, energy efficient buildings and the use of renewable technologies, climate change can be positively addressed in the future.

Development can and should mitigate the effects and pressures on infrastructure resulting from development.

### Question CLIM1

New development should avoid any net increase in greenhouse gas emissions, wherever practicable, providing viability is taken into account.

### Question CLIM5

Any proposed detailed criteria for tackling climate change should be specified in a concise Local Plan policy. Such policy will be tested and examined thoroughly and given a higher status than any design code. It will also allow for more consistency and certainty in decision making.

### Question CLIM6

The concept of 'living locally' to influence the location of new homes as set out in the consultation is not realistic or practical in a predominantly rural district. It is inevitable that with limited access to reliable, regular and affordable public transport, poor pedestrian and cycle links between villages and towns, that people will use the more convenient private car.

However, by allocating new development in sustainable locations adjacent to towns, existing sustainable modes of transport will be safeguarded and encouraged.

With the rapid increase in electric vehicle ownership, the historical mind set of the private car being a heavy polluter, is now rather outdated.

The housing strategy of the Local Plan should give priority to new homes in sustainable locations on the edge of sustainable settlements such as Liphook.

### Question POP1

The Standard Method should be used to determine the requirements against which the five-year housing land supply and Housing Delivery Test are measured.

Exploring whether there may be 'exceptional circumstances' to devise a revised (lower) local housing requirement will simply delay the Local Plan process and frustrate the delivery of housing. It would also have the effect of pushing the problem onto a neighbouring authority who will no doubt be more inclined to find their own 'exceptional circumstances'. This option will exacerbate the housing crisis.

### Question POP3

The Local Plan should meet all the housing needs of East Hampshire's part of the SDNPA. There is no other realistic option if these needs are going to be met.

### Question POP4

EHDC should offer to assist with some unmet needs of neighbouring authorities where there may be a direct relationship with the communities of East Hampshire. This is what the duty to cooperate was intended for.

### Question HOU1

Housing policies in the Local Plan should ensure that all housing needs/requirements for all groups are met including older person's accommodation.

### Question HOU5

The Local Plan should include a housing mix policy which includes a realistic range of house types with a sensible threshold (15 units) for when the policy is applicable.

### Question HOU7

The current requirement of 40% affordable homes provision should be maintained. Any increase is likely to lead to issues of viability and deliverability.

### Question HOU8

There should be specific housing policies on first homes and self-build and custom housebuilding.

### Question INF1

Community facilities, provision of sports facilities and green space should be given priority in all new developments. Allocations/developments that provide on-site provision of community and sports facilities and green space should be given priority over those sites which do not.

### Question DEV1

The development Strategy should take account of and prioritise the most sustainable locations for new housing.

#### *Option 1: Disperse new development to a wider range of settlements*

This option should only be considered if the dispersal approach is proportionate to the size and sustainability of the town/village. A larger proportion of homes should be allocated to the most sustainable settlements, such as Liphook, where there are genuine choices for sustainable travel, including rail, and an extensive range of services and amenities for daily needs.

A smaller proportion of development should be allocated to the smaller settlements. Settlements which do not have access to sustainable travel choices, such as rail, and schools, employment and services and facilities to support daily needs, should not be considered sustainable locations for new development.

Option 1 is considered to be the preferred option as it would distribute development towards the most sustainable locations including Liphook.

#### *Option 2: Concentrate new development in the largest settlements*

Concentrating all new development in the largest settlements outside the National Park should only be considered a viable option if Liphook is included as one of the largest settlements.

Excluding Liphook, which is a highly sustainable settlement, from Option 2 would place enormous pressure on the two Tier 1 settlements to accommodate all the necessary development targets. This approach would deprive the town of Liphook from much needed market and affordable homes, which will assist in sustaining the numerous businesses, services and local facilities already available in the town along with promoting new ones.

Liphook is a sustainable place to live and work and needs to continue to grow at a rate which is proportionate and appropriate. Therefore, Liphook should be allocated a significant proportion of new development in the emerging Local Plan.

Option 2 is only considered to be a viable option if large sustainable towns like Liphook are included.

*Option 3: Distribute new development by population*

This option is not an appropriate route for allocating new development because it does not have regard to the accessibility and sustainability of settlements.

Just because a town or village has a high population doesn't necessarily mean that it is the most suitable or sustainable location for new development. Similarly, towns with a more modest population can be in highly sustainable locations where there is access to sustainable modes of transport like rail and a wide range of local facilities and amenities.

Option 3 is not considered to be a viable option.

*Option 4: Concentrate development in a new settlement*

This option is rarely successful in delivering the quantum of development needed in a timely manner. From concept, new settlements can take decades to start to deliver any meaningful housing.

Due to the land take required, new settlements usually involve a large number of land owners, often with competing interests. There would be a need for collaborative and equalisation agreements which are very detailed and take a considerable length of time to establish. Without such agreements in place, there will always be doubts over the delivery of a new settlement.

The task of finding a sustainable location for a new settlement in a rural and heavily constrained district is, in itself, challenging.

The quantum of new homes (and businesses) needed to make a new settlement truly sustainable and self-sufficient is much greater than the Councils anticipated 3,405 new homes for the plan period.

This option would also deprive existing sustainable towns like Liphook from much needed market and affordable homes which will contribute to the continued sustainable growth of the numerous existing businesses, services and local facilities and stifle the promotion of new businesses and local amenities.

Option 4 is not considered to be a viable option.

Yours sincerely,





BJC PLANNING

**EAST HAMPSHIRE LOCAL PLAN 2021 – 2040**

**ISSUES AND PRIORITIES REGULATION 18 – PART 1**

**RESPONSE TO THE CONSULTATION**

Response prepared by



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January 2023

### **1.0 INTRODUCTION**

- 1.1 The purpose of this consultation is to assist the Council to select “the right high-level principles”.
- 1.2 The Consultation recognises that the Southern Parishes is a distinct sub area. The Consultation is lacking in detail for the Southern Parishes and this makes it impossible to assess the ‘high-level principles’ for this area.
- 1.3 It is noted that there is no reference in the Consultation to the need to provide plots for people interested in self/custom build houses. This is contrary to the government’s strong support for such provision.
- 1.4 It is recognised that the Council is not seeking information “about particular sites or neighbourhoods for where new housing could and should be built.” However, I believe that it is essential to refer to one site, land at Whichers Gate Road, Rowlands Castle in order to elaborate the points.

### **2.0 HIERARCHY**

- 2.1 The Consultation recognises that the Southern Parishes is a distinct area. The northern parts of the District are separated by the intervening areas of the South Down National Park. This is stated as:-

**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.**

- 2.2 It is evident that much of the Consultation has little relevance to the Southern Parishes. The provision of facilities in the northern area cannot serve the southern area. A large settlement in the northern area would not assist the District as a whole.
- 2.3 The Consultation divides the District into three areas, namely, North West (32,980 = 26.6%) North East (34,641 = 28%) and Southern Parishes (22,131 = 17.9%). The north and south areas are separated by the extensive area of the South Downs National Park. As a consequence, it is essential that the southern part of the District is examined separately from the northern ones. It is obvious that the provision of affordable housing, for instance, must be considered on an areal basis. Similarly, the provision of facilities, such community facilities, in the northern areas could not serve people in the Southern Parishes.

- 2.4 The relationship between the National Park and the East Hampshire LPA areas creates uncertainty. The Consultation states that for the East Hampshire LPA it means that the local housing need is 517 homes per year, and for the SDNP LPA area 115 homes per year. It then states that:-

**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.**

- 2.5 There is no explanation as to how the Councils will address these uncertainties. It seems that the SDNP will meet its affordable requirements but look to the East Hampshire LPA to meet the shortfall in market housing.

Need for cooperation with the Partnership for South Hampshire (PfSH)

- 2.6 There is no reference in the Consultation to the “**research**” undertaken by the Partnership for South Hampshire (PfSH) or “**the results on various topics including housing.**” As a consequence, it is not possible to respond meaningfully to the Consultation without knowledge of these matters.

- 2.7 The Council should either provide the Partnership for South Hampshire (PfSH) information or treat the Southern Parishes as a distinct sub area with a separate section in the Local Plan. It is only possible to make very generalised responses to the Consultation in the absence of any knowledge the work of Partnership for South Hampshire.

### **3.0 ACCESSIBILITY**

- 3.1 The Consultation refers to the new settlement hierarchy. Much of this is irrelevant for the consideration of the Southern Parishes. There are few villages in the Southern Parishes to which the policies apply. Nevertheless, the concept of “living locally” is supported.

- 3.2 The Consultation emphasises the importance of accessibility on foot and by bike to minimise travel. It has defined “living locally” as “20-minute neighbourhoods” where 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.” This would enable people to live more locally in the future. This should be a fundamental consideration when development sites are assessed.

### 4.0 HOUSING REQUIREMENT

- 4.1 There is considerable political uncertainty about the intentions of the government with regard to the housing requirement. The government is still seeking to boost housing provision and it hasn't abandoned the aspiration to develop 300,000 dwellings per annum.
- 4.2 Indeed, it is recognised that there is a desperate shortage of housing. Young people are trapped in rented accommodation, and many will never be able to own a home of their own. Rents are high making saving for a deposit difficult. The Council's approach as established in the Consultation is that this shortage should be maintained. This approach cannot be acceptable.
- 4.3 The Council's analysis concludes that it will be necessary to find an additional land for a minimum of 3,405 new homes by 2040. This figure seems very low. There is considerable uncertainty about the government's direction of travel but it seems probable that the figure of 3,405 will have to be increased. The Consultation concedes that the government guidance is clear that the standard method for assessing local housing need is a *minimum number*.
- 4.4 On the basis of the Council's analysis there is a total need for 613 affordable homes across the District per year. This figure hasn't been split between the three areas. It will be impossible to meet the need for affordable housing in the Southern Parishes without allocating larger sites above the minimum threshold of ten units that excludes affordable provision. Only a relatively large site can provide a range of affordable housing. The Consultation admits to a shortage of disabled provision but makes no recommendation as to how this will be resolved.

#### National Planning Policy Framework

- 4.5 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>)<sup>(1)</sup>**

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<sup>1</sup> See NPPF Footnote: re self and custom build housing (see also paragraph 7.2 of this response)

- 4.6 Similarly, the Consultation states that ‘the 2021 Census is indicating that approximately a quarter of our residents were aged 65 years and over.’ It recognises that this could mean that by 2040 45% of the population will be over 65. The Consultation response makes no recommendations as to how this should be addressed it simply states that there may be a need for “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”.
- 4.7 The issue of the ageing population is a crisis. Smaller units and downsizing are only part of the solution. This is not the case for most people. More housing needs to be provided to meet the requirements of the elderly. Homes, where people can return after a fall for instance, are paramount. The adaptation of a dwelling at a later stage to install a chairlift, for example, can be very expensive. It was revealed in research that over 40% of admissions to hospital prior to covid issues were the result of the elderly suffering falls.
- 4.8 The Consultation does not propose a solution, but this needs to be addressed in the consideration of housing “types”. The Consultation simply recommends more smaller dwellings. There is a need for housing that does not require adaption ie houses built specifically to a standard that doesn’t require later modification.

## **5.0 THE FOUR OPTIONS**

- 5.1 The Consultation identifies four Options for the distribution of new housing. The north and south areas are separated by the extensive area of the South Downs National Park. As a consequence, it is essential that the southern part of the District is examined separately from the northern ones. It is obvious that the provision of affordable housing, for instance, must be considered on an areal basis. Similarly, the provision of facilities, such community facilities, in the northern areas could not serve the Southern Parishes.
- 5.2 This response relates primarily to the southern part of the District.

### **Option 1: Disperse new development to a wider range of settlements**

- a) This Option is the best way to meet the priority of satisfying the objective of “living locally”. The Consultation objective states that:-

**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.**

- b) The Consultation recognises that:-  
**“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”**
- c) This option meets the greatest number of the Council’s objectives especially with regard to “living locally”.

### **Option 2: Concentrate new development in the largest settlements**

- a) It is not possible to create a large settlement in the Southern Parishes. A large settlement in the north of the District cannot fulfil the Council’s objectives.
- b) It is not agreed that “the largest settlements give people the greatest opportunity for walking and cycling to shops, schools and public transport connections”. The outer low density suburban areas could be much further than 20 minutes from shops and schools and well beyond walking distances. New housing estates are built on periphery of towns.
- c) It certainly would not meet the needs of rural communities. New development will help sustain the existing services and facilities in local communities. The Taylor Review 2008 warned of rural communities which are ‘protected’ from development losing facilities and amenities as the population grows older and affordable homes for younger families become unavailable.
- d) The Taylor Review states that the question planners must address is “how will development add to or diminish the sustainability of this community?” It is important to take a better balance of social, economic, and environmental factors together to form a long-term vision for all scales of communities. A mix of housing and employment opportunities are essential for the sustainability of rural communities.

### **Option 3: Distribute new development by population**

- a) The two areas identified in the Consultation in the northern part of the District have very similar populations. The Southern Parishes is significantly smaller. The implications of the possible distribution by population seems irrelevant to the northern areas. A statistical approach to the distribution of development seems to be too crude. Each area needs to be examined to understand its particular requirements.

- b) Furthermore, the Consultation states that there is little difference in the population structures. With regard to the age distribution it states that:-

**there are no marked differences across the district.**

- c) The Southern Parishes must be considered as a separate entity.

**Option 4: Concentrate development in a new settlement**

- a) There is no scope to identify a site for a new settlement in the southern part of the District. Even if this were possible it could not serve the northern parts of the District and a new settlement in the northern part of the District could not assist the southern area.
- b) New settlements can take very long time come to fruition. Major infrastructure issues often arise which cause significant delays. There is the example of Welborne Garden Village in Fareham Borough. This was first proposed in 2006 but the issue of highway access from the M27 has proved very costly and there is still no commencement to the development of the 6000 homes proposed. The original figure of 10,000 has been abandoned.
- c) The Consultation identifies the concepts that are “less good”. The relevant bullet point states:-
- **Supporting the growth and prosperity of South Hampshire**
- d) Similarly, it is not accepted that a new settlement would satisfy the bullet point: -
- **Meeting affordable housing needs where they arise**
- e) The need for affordable housing is a significant consideration throughout the District. A new settlement in the northern part of the District would not provide affordable housing where it is needed. It is important to provide sites in the southern part of the District to meet the local need.
- f) The Council admits that a new settlement is “less good” in respect of flood risk. The bullet point states:-
- **Building homes in areas with the lowest risk of flooding**
- g) It is paramount that areas where there is any risk of flooding must be avoided. It follows that building homes with the lowest risk of flooding is essential throughout the District.

- 5.3 There is general support for meeting the identified local housing needs and seeking to direct development to the most sustainable and accessible locations.

### **6.0 GREEN INFRASTRUCTURE**

- 6.1 The Consultation 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.**

- 6.2 The emphasis on inward investment seems to be misplaced. Surely, the emphasis should be on the enhancement of biodiversity and the protection of habitats.

- 6.3 The Consultation recognises that the Local Plan can address strategic green infrastructure issues. There is a major opportunity to consider mitigation of nutrient load and biodiversity in terms of pooling resources into rewilding and eco-system repair. The allocation of sites for housing development should give priority to those that offer strategic biodiversity/habitat enhancement benefits and the least impact.

### **7.0 SELF BUILD AND CUSTOM BUILD HOUSING**

- 7.1 There is no reference in the Consultation of the need to provide plots for self build and custom build housing. There is considerable government support for this sector.

#### National Planning Policy Framework

- 7.2 A Consultation has been published seeking responses to the proposed revisions to the National Planning Policy Framework. There is a specific reference to self build and custom build housing in the revised paragraph 63. This paragraph also refers to a footnote <sup>(33)</sup>. The footnote states:-

**Under section 1 of the Self Build and Custom Housingbuilding 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.**

- 7.3 A separate objection has been submitted setting out the issues. The Consultation has completely failed to address this matter.
- 7.4 The government commitment is enshrined in the Self Build and Custom Build Housebuilding Act 2015 (and the Housing and Planning Act 2016). It was evident that the 2015 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.**
- 7.5 Richard Bacon's Report made several recommendations to improve the provision. The Local Plan has failed to meet the government's requirements to provide sufficient plots for self build and custom build housing. The aspirations of the many people to build their own homes are being suppressed in the District.
- 7.6 Self/custom build housing offers many benefits. The National Association of Custom Self Build (NASCBA) has pointed out that:-
- Custom and Self build houses are built by SME housebuilders, who feed into local economy and train local people.**
- 7.7 Furthermore, many local communities are supportive of such developments and prefer this form of development to the indistinguishable estates developed by the volume housebuilders.
- 7.8 The latest figures for Horndean, Clanfield and Rowlands Castle state that there are 86 people on the Council's Register. However, it is well known that this is significant under estimate of the demand according to NACCSBA. Many people who are keen to build their own homes are not even aware of the need to, or importance of registering with the Council. It is not known if the Council has identified any plots in the Southern Parishes to satisfy this requirement.
- 7.9 The Council recognises that it will be very challenging to build zero-carbon homes during the local plan period. However, it is well known that the self build and custom build homes aspire to achieve the highest levels of energy efficiency (NACCSBA).
- 7.10 Self build and custom build plots often offer greater value than traditional ones. However, the promoters of self build/custom build schemes 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 often expedient to take a smaller sum immediately than a possibly larger sum that they may believe will not materialise.

- 7.11 The most significant reason for the Council's reluctance to promote self and custom build housing seems to be the loss of revenue from the Community Infrastructure Levy (NACSBA). However, the purchasers that benefit most from the exemption are the purchasers of single plots that command the highest prices. So these are the purchasers who could most readily pay the levy. The removal of the exemption from the levy seems desirable.
- 7.12 The Council should allocate sites specifically for self build and custom build homes.

## **8.0 LAND AT MAYS COPPICE FARM, WHICHERS GATE ROAD, ROWLANDS CASTLE**

- 8.1 It is recognised that the Council is seeking a high level analysis of principles. However, it is important to recognise the merits of the above site to meet many of its objectives.
- 8.2 Access to the centre of the village is possible now using Bridleway 24. However, this Bridleway is not lit and the surface cannot be up graded because it used by horses. The promoters of the site are seeking to resolve these issues by providing pedestrian and cycle access to the village through The Drift (as shown on the attached plan entitled "Collaboration Plan").
- 8.3 The benefits of the access through The Drift are that it could provide a surfaced footpath for walkers and cyclists (and those on mobility scooters). The Drift could be lit thereby providing a safe link to the village. This would meet the principles of the "living Most of the facilities in the village would be within 20 minutes of the site". The number of additional visits created by the development of this site for housing would add significantly to the viability of the village.
- 8.4 Access to The Drift from Mays Coppice Farm crosses land in a separate ownership. The promoters of the Farm have opened negotiation with the owners of this land to see if agreement can be reached on this matter. As part of any agreement the promoters of Mays Coppice Farm have offered vehicular access to Whichers Gate Road. The highway access to Whichers Gate Road was permitted several years ago and it has been implemented to a standard that could serve at least 150 dwellings. This would mean that the development of the site would not entail vehicles needing to gain access to the village centre.

- 8.5 A layout has been prepared for the land at Mays Coppice Farm. The layout shows 75 dwelling units. It is proposed that the site will meet the affordable housing requirements of the Local Plan. This would provide 30 affordable dwellings. It is proposed that the other 45 dwellings would be offered as custom/self build houses. The owners of the land (identified as “Land owned by Others” on the Plans) have been promoting their land for housing using a direct vehicular access to the village.
- 8.6 The development of the 75 houses would leave a substantial area of land available for biodiversity net gain and off-setting. The promoters have instructed Tetra-Tech to provide a report on the ecology benefits. The undeveloped land would be capable of meeting the requirements biodiversity net gain. A strategic wildlife corridor could also be provided that would facilitate connectivity to woodland in the National Park (as shown on the Plan entitled “Wider Concept Plan”).
- 8.6 The latest figures for Horndean, Clanfield and Rowlands Castle state that there are 86 people on the Council’s Register. It is not known if the Council has identified any plots in the Southern Parishes to satisfy this requirement.
- 8.7 These proposals could also meet the Council’s objectives of biodiversity net gains by “creating new green infrastructure”.
- 8.8 The site at Mays Coppice Farm could meet many of the Council’s objectives and it has been established that there no overriding planning constraints in the documents submitted previously in connection with a proposal to develop a Garden Centre.

## **9.0 CONCLUSION**

- 9.1 It is evident that much of the Consultation has little relevance to the Southern Parishes. There is no reference in the Consultation to the “**research**” undertaken by the Partnership for South Hampshire (PfSH) or “**the results on various topics including housing.**” As a consequence, it is not possible to respond meaningfully to the Consultation without knowledge of these matters.
- 9.2 There is no reference in the Consultation of the need to provide plots for self build and custom build housing.
- 9.3 The site at Mays Coppice Farm could meet many of the Council’s objectives.



**PLANS**

- 1. Collaboration Plan**
- 2. Wider Concept Plan**



**OBJECTION TO EAST HAMPSHIRE LOCAL PLAN 2021 – 2040**

**ISSUES AND PRIORITIES REGULATION 18 – PART 1**

**RESPONSE TO THE CONSULTATION**

**Failure to make reference to self/custom build housing**

Response prepared by

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January 2023

### **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.
- 1.3 The recently published consultation on the National Planning Policy Framework has confirmed the continuing and emphatic government support for the provision of plots for people seeking self and custom plots.
- 1.4 This objection is subject specific and it is supplementary to a more comprehensive response to the Consultation submitted separately.

### **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 high specification kitchen 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 promoted 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 permissions 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).**

### **National Planning Policy Framework**

5.8 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>**

5.9 It can be seen that there is specific reference to “**people wishing to commission or build their own homes**”.

5.10 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.**

5.11 The guidance is crystal clear.

### **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 (NACCSBA: 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 The latest figures for Horndean, Clanfield and Rowlands Castle state that there are 86 people on the Council's Register. However, it is well known that this is significant under estimate of the demand according to NACCSBA. Many people who are keen to build their own homes are not even aware of the need to, or importance of registering with the Council. It is not known if the Council has identified any plots in the Southern Parishes to satisfy this requirement.

- 6.5 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.
- 6.6 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 urban 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 sell for very high figures. One site for six plots in Greenaway Lane, Warsash (Fareham Borough) 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 serviced 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 In the case of sites acquired by a promotor for the sale of plots, 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 against other sites. The only way in which this shortage of 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. There are greater benefits of a larger scheme to the local community because it contributes affordable housing. On the other hand, 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 latest figures for Horndean, Clanfield and Rowlands Castle state that there are 86 people on the Council's Register. However, it is well known that this is significant under estimate of the demand according to NACSBA. Many people who are keen to build their own homes are not even aware of the need to, or importance of registering with the Council. It is not known if the Council has identified any plots in the Southern Parishes to satisfy this requirement.
- 8.4 It seems that Council's deliberately suppress demand. 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 (NACSBA Report

2022). 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 afford to pay the levy that benefit most. The removal of the exemption from the levy seems desirable.

- 8.5 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.
- 8.6 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.
- 8.7 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 are strongly supported.
- 8.8 There is no reference in the Consultation to Self and Custom Build housing and nor to the government's requirements to provide plots to meet the demand. It appears that the Council is intent on suppressing demand.

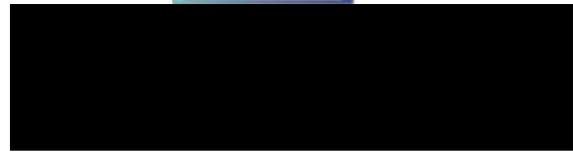
**Plan** showing draft custom and self build layout for 75 units at Mays Coppice Farm, Whichers Gate Road, Rowlands Castle provided separately.

Ref: [REDACTED]

15<sup>th</sup> January 2023



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



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**BlackBoxPlanning.co.uk**

Dear Sirs,

**East Hampshire Local Plan 2021-2040 – Issues and Priorities Regulation 18 – Part 1 – November 2022**

I write on behalf of my client, Redrow Homes Southern Counties ('Redrow') to provide Representations to the above referenced consultation of the East Hampshire Local Plan Review 2021-40.

These Representations are submitted with specific regard to Redrow's interest in land at Land West of Longbourn Way, South Medstead. A site location plan is attached at Appendix 1.

Redrow has a track record of delivering new homes across the County and continues to play an important role in helping East Hampshire District address its housing needs. They deliver high quality homes, which has earned them a reputation as a leading housebuilder in the industry.

It is recognised that the Local Plan is at an early stage. The overriding objective of the emerging Local Plan must be on providing a sound spatial strategy whilst delivering the areas objectively assessed housing need.

In these representations, consideration is given to national planning policy requirements for plan-making as set out in Chapter 3 of the National Planning Policy Framework (NPPF), including paragraph 35 which stipulates the tests of soundness for examining local plans as follows:

- Positively prepared;
- Justified;
- Effective; and
- Consistent with national policy.

Therefore, these representations address the issues and options with specific regards to our client's interest at West of Longbourn Way. West of Longbourn Way measures approximately 4.37ha and comprises low-grade agricultural land in use as grazing pasture. It lies within the Parish of Medstead in an area known locally as 'South Medstead', though is spatially

associated with the settlement of Four Marks, to which it lies adjacent to at Longbourn Way. It sits within the Large Development Site ('LDS') at South Medstead and whilst these submissions and the site, generally, are consistent with the LDS, it is capable of delivery as a distinct parcel.

### **Issues and Priorities Regulation 18 – Part 1 – November 2022**

The draft Local Plan sets out a series of Issues and Priorities, and does not seek to establish preferred options or detailed policies.

These representations therefore consider the options proposed within the Regulation 18 Local Plan, and are considered below:

#### Settlement Hierarchy

The identification of Four Marks & South Medstead as a 'Tier 2' Settlement – which benefits from good access to a wide variety of community, retail and employment services – is supported.

It is noted that the identified local centre and associated 20 minute neighbourhood includes land for potential allocation in any new plan – including Land West of Longbourn Way – that would fall within the '20 minute neighbourhood' as identified by the Council.

The Council recognise that Four Marks & South Medstead is an 'unusual' case within the settlement hierarchy, given the specific location of the 2no. primary schools (the Four Marks Church of England Primary School and the Medstead Church of England Primary School) which serve the wider settlement. The 'unusual' spatial nature of Four Marks is recognised and supported.

However, it is considered that the area identified as the Four Marks 'town/village centre', from which the '20 minute neighbourhood' is derived does not pay sufficient regard to existing retail and employment services available to local residents and located to the north of the railway line<sup>1</sup>. This area also includes further commitments for town centre and recreational uses and aspirations to further regenerate Lymington Barns, a local centre within the same land ownership as land west of Longbourn Way and well placed to make a significant contribution to forming a nucleus for a 20 minute walkable neighbourhood, even more so alongside further planned regeneration.

The presence of these services is considered to further underscore and justify the variety of services on offer within Four Marks and accessible to local residents, and it is considered therefore that a revised 'local centre' for Four Marks should be identified, which recognises the presence of this additional employment and retail centre to the north of the railway line.

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<sup>1</sup> Identified in the Four Marks and South Medstead Neighbourhood Plan (made 2016) as Lymington Barn and 'The Railway Station Hub' (or Station Approach) respectively

The identification of a further local centre would be consistent with the Council's approach in other settlements, such as at Whitehill and Bordon.

Separately, it is noted that Appendix D to the Settlement Hierarchy identifies that Four Marks and South Medstead score '0' in the provision of Primary Schooling. Given the scoring criteria as set out in Appendix C identifies that the presence of a primary school 'within [the] settlement' (rather than within the identified '20 minute neighbourhood') should score 1 point, the settlement scoring for Four Marks and South Medstead should therefore be concurrently increased.

The current settlement hierarchy incorrectly identifies that there are no primary schools in Four Marks and South Medstead, whereas the existence of 2no. primary schools within Four Marks and Meadstead further underscores the sustainability of the settlement.

Additionally, the presence of the active Four Marks & Ropley Scout Group, based in a facility next to Four Marks recreation ground, is not reflected within the current scoring structure as a 'Youth or social club'.

The resultant amendment to the scoring criteria for Four Marks and South Medstead identifies the settlement as the joint second most sustainable Tier 2 settlement within the District, with a total score of 21, notwithstanding any potential changes to the 'town/village centre'.

It is further noted that there are ongoing consultations, led by Four Marks and Medstead Parish Councils, for the creation of a Community Building and Recreational Hub. Such a development would further enhance the sustainability credentials of Four Marks and South Medstead.

It is also considered that potential remains, in and around South Medstead, to promote further enhancements to the provision of social and economic infrastructure, historically promoted. This should include employment allocations in the Local Plan. Much of the discussion in the area focuses on housing delivery, it is a principal component of meeting needs within the community, however the Local Plan should be used to facilitate a more rounded approach to sustainable development. Land west of Longbourn Way is a good location to fit with the concept and promotion of more walkable neighbourhoods alongside future planned and committed development. However, it is also extremely well placed now and the critical mass of existing facilities – in particular those offering local retail, community, and employment facilities – should also not be overlooked, including the role that new homes will play in supporting the vitality and viability of those facilities, creating a more vibrant community in line with core national policy objectives.

### Spatial Development Options

The Regulation 18 Local Plan considers four spatial development options – dispersal, concentration within the largest settlements, apportionment by population, or a new

settlement of 'over 1,500 new homes' – and identifies the need to find additional land for a minimum of 3,405 new dwellings by 2040<sup>2</sup>.

It is noted that, with specific reference to Land at Longbourn Way, that sustainable development at Four Marks and South Medstead is not considered to be precluded by any of the four options as set out by the Council. As previously set out, Four Marks is the second most sustainable 'Tier 2' settlement within the District, offering good levels of accessible community, retail, and employment services within the settlement itself. It additionally offers frequent public transport connections to Alton and Winchester in particular. The Local Plan provides opportunities to support delivery of additional socio economic infrastructure at the settlement, supplementing an effective 20-minute neighbourhood, but irrespective of this, some housing will also support the ongoing vitality and viability of the existing services and facilities.

As set out below however, specific concerns are raised regarding the potential sustainability and deliverability of a preferred spatial strategy to deliver either a new settlement or apportionment by population. Specific concerns are also raised regarding the deliverability in particular locations within the district.

#### *Option 1 and 2: Dispersal and Concentration within the largest settlements*

The options for dispersal or concentration within the largest settlements are, in principle, supported.

It is, however, noted that the Council are currently reliant upon completions at the Whitehill & Bordon strategic allocations in the delivery of its housing supply. 64% of completions in the 2021/22 monitoring period were delivered in the north east sub area (i.e. the area where Whitehill and Bordon is located), and 55% of current commitments are also within this sub region.

Given such an existing reliance on Whitehill & Bordon to deliver the districts housing need, it is noted that further deliverability at Whitehill & Bordon is subject to a number of constraints. The proximity of locally, nationally and internationally designated sites to the settlement of Whitehill and Bordon is noted, alongside the immediate boundary with the SDNP. It is further noted that Natural England have previously raised concerns regarding the impact of significant further development at Whitehill and Bordon<sup>3</sup>. It is considered therefore that there is limited capacity at Whitehill and Bordon for further development, and such limited capacity would result in additional allocations at sustainable Tier 1 and Tier 2 settlements within the district under both Option 1 and Option 2, including at settlements such as Four Marks & South Medstead.

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<sup>2</sup> The soundness of the identification of 3,405 new dwellings is considered under "Housing Need and Housing Requirements", as set out below.

<sup>3</sup> Natural England response to EHDC Large Development Sites consultation dated October 2019 noted that 'Natural England is therefore of the view that existing capacity at Hogmoor SANG, coupled with new capacity from Oxney SANG, is sufficient to accommodate 795 dwellings at Whitehill and Bordon'

With reference to Land at Longbourn Way, it is considered that development at Four Marks supports Council aspirations for walking, cycling and active travel, limits reliance on the private car, offers the opportunity to deliver suitably affordable housing, offers economic and retail opportunities and therefore a degree of self-containment, and is largely unconstrained in terms of environmental, biodiversity, or other constraints. Development at suitably unconstrained Sites at Four Marks and South Medstead, including at Land at Longbourn Way, is therefore considered to be wholly consistent with the Council's concept of the '20 minute neighbourhood' and the settlement hierarchy.

*Option 3: Apportionment by population*

The option to distribute development by population across each of the three sub areas is not supported. Such an approach pays no regard to the spatial circumstances of developable land within each of these sub areas.

Particular reference in this instance is given to the southern parishes, which operate under substantial constraints due to existing consented development, biodiversity, conservation and flood risk, alongside the immediate presence of the South Downs National Park. These factors act to restrict potential developable land in this location.

Additionally, with regards the 'north east' sub-area, the limited potential capacity of Whitehill and Bordon has been previously noted. It is considered therefore that development apportioned by population within this sub-area would additionally pay little regard to deliverability, placing substantial reliance on delivering new development at Liphook, itself subject to constraints due to environmental designations as well its constrained location immediately adjacent to the SDNP.

It is considered that a strategy that apportioned development by population would be at significant risk of being unable to identify sufficient specific deliverable or developable sites to meet the districts objectively assessed need. Furthermore, an evidence base reliant on distribution based upon existing population, which did not holistically consider other planning constraints, would not be considered to be sufficiently justified.

The option to apportion development by population is therefore not considered to be consistent with sustainable development, justified, nor consistent with national policy. Such an approach is therefore, unsound.

*Option 4: New settlement*

Regarding any proposed new settlement, and notwithstanding the potential sustainability of such a settlement, it is noted that the Local Plan sets out the need for 3,405 new dwellings, and identifies the option for a potential new settlement of 'over 1500 new homes' to be delivered within the District boundaries.

Based on the statement of 'over 1500 dwellings', it is clear that any new settlement is highly unlikely to meet the District's full identified housing needs. It is also difficult to see how such

a provision would be of sufficient critical mass to deliver any form of self containment which would contribute to overriding objectives in relation to the Council's response to the climate emergency and de-carbonisation.

Notwithstanding the above, even if a new settlement were identified, further allocations would be required across the District, at sustainable settlements such as Four Marks and South Medstead. The lead in times and delivery at a new settlement are also likely to extend well beyond the plan period, limiting the realistic contribution it will make to the housing trajectory.

As set out in Paragraph 73 of the NPPF, in any allocation of a new settlement a local planning authority is required to make a realistic assessment of likely rates of delivery, given lead in times for large scale sites. Sites of between 1500-1,999 new dwellings take, on average, 5.3 years to secure planning permission, and a further 1.7 years to deliver the first dwelling, with build out rates from that point of approximately 120 dwellings per annum (dpa)<sup>4</sup>. Across the 19 year plan period therefore, and assuming a plan adoption in 2025, this would equate to at most approximately 960 dwellings being delivered for any new settlement, with the first dwellings being delivered in 2032. This further underscores the need for sustainable development at sustainable settlements to both meet identified housing need and to deliver necessary housing across the full plan period.

It is further noted that the identification of a new settlement was considered at length in the previous Regulation 18 consultation undertaken by East Hampshire District Council. A proposed new settlement at Northbrook Park was identified and subsequently discounted, with the sustainability appraisal noting that Northbrook Park was "among the weakest options across a range of both environmental and socio-economic themes"<sup>5</sup>. The evidence base and appraisal undertaken in the assessment of a new settlement in the previous Local Plan Consultation is detailed and substantial, and this prior identification of a lack of soundness for a proposed new settlement is, in broad terms, unsupportive of this option being taken forward as the preferred option in any new emerging plan.

However, the merits of planning for larger scale strategic development at existing settlements, such as Four Marks and South Medstead should not be conflated with the challenges of a new settlement. Existing infrastructure and facilities already exist and there could be significant sustainable benefits in building on that existing provision in an effective manner. Land west of Longbourn Way forms part of the LDS being promoted at South Medstead and could have the added benefit of being available as an early phase of a larger scheme, being reasonably self-contained and deliverable without prejudicing any wider objectives.

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<sup>4</sup> *Start to Finish: What factors affect the build-out rates of large scale housing sites?*, Lichfields (2020)

<sup>5</sup> Sustainability Appraisal (SA) of the East Hampshire Local Plan Interim SA Report (Strategic Site Options), February 2021

## Housing Needs and Housing Requirements

Notwithstanding the recently issued 'Levelling-up and Regeneration Bill: reforms to national planning policy' open consultation issued on 22 December 2022 and associated Written Ministerial Statement made on 6 December 2022, in broad terms the use of the standard method to calculate local housing requirements is supported.

It is noted the Council have not set out any exceptional circumstances that the Council consider would justify an alternative approach to the use of the standard method, and at this stage, it is hard to conceive of what any exceptional circumstances may be. East Hampshire District is a reasonably unconstrained area save for the National Park. The expected number of homes being planned for is not at a level where accommodating the needs of the District in full would be unachievable given this lack of substantial constraints, with reference given the lack of substantial constraints in the North West sub-region, and at Four Marks and South Medstead in particular.

It is noted however that the Council relies upon a contribution of 115dpa from the South Downs National Park for the purposes of calculating the Local Housing Need within EHDC (excluding the SDNP)<sup>6</sup>. The figure of 115dpa relies upon on modelling undertaken within the HEDNA and does not pay any consideration to actual delivery rates within the SDNP, nor commitments made by the SDNP through past Statements of Common Ground. It is considered to overstate the potential for delivery in the SDNP area of the District which, by their own admission, will taper down to closer to 25dpa.

The Council state that:

*It is not considered appropriate to continue to apportion local housing need based on a supply response as part of the plan-making process. Housing supply changes on an annual basis as does the inputs to the standard method, resulting in uncertainty around housing numbers. In addition, both EHDC and the SDNPA have both committed to reviewing their adopted Local Plans and it will therefore necessitate increasing supply beyond the 2033 period currently established in the South Downs Local Plan. As a result, the HEDNA (2022) has sought to approach a split between the SDNP and the wider EHDC area by considering whether a different standard method figure exists for each area*

The Council relies upon this figure of 115 dwellings to generate a housing need for EHDC of 517 dwellings per annum (based upon an objectively assessed need of 632 for East Hampshire including the SDNP as established through the standard method). This figure of 517 dwellings is used to calculate a minimum housing requirement for EHDC across the plan period of 9,823. Noting completions and committed development, this results in a residual requirement for 3,405 dwellings over the remaining plan period for which the Council will need to find additional land.

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<sup>6</sup> For the purposes of this section, EHDC refers to the housing requirement of East Hampshire District Council excluding the South Downs National Park. SDNPA refers to the South Downs National Park Authority.

Whilst the Council recognise that further discussions with the SDNPA regarding unmet need will be needed during course of the local plan making process, determining the objectively assessed need for EHDC with sole reference to the HEDNA modelled outcome is not considered to be sufficiently justified nor positively prepared. Such an approach does not pay sufficient regard to prior 2021<sup>7</sup> and 2018<sup>8</sup> Statements of Common Ground (SoCG) with the SDNPA, delivery rates within the SDNP (estimated at a best case of 96dpa in accordance with information published within the 2021 SDNP AMR), relies upon the SDNPA bringing forward a plan that increases supply specifically within East Hampshire during the plan period, and does not pay regard to the duty of the SDNPA to foster the wellbeing of local communities, pursuant to its statutory purposes related to natural beauty, wildlife, cultural heritage and special qualities.

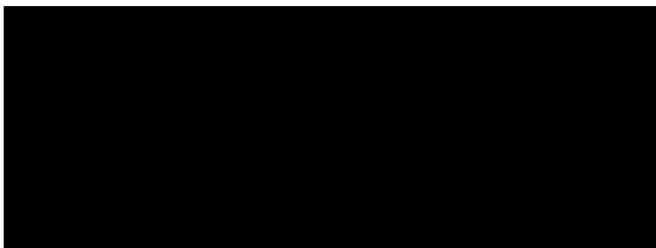
The exclusive use of HEDNA derived data to establish the contribution of the SDNPA to East Hampshire Housing Need as a whole, and the lack of consideration of delivery rates or commitments by the SDNPA, is therefore considered unsound. There is therefore a resultant risk that reliance upon this HEDNA derived data results in an overall housing requirement and residual supply requirement for EHDC that is not sufficiently justified, effective, nor positively prepared.

Best practice in such an instance is to rely upon the precautionary principle, and utilise established and forecast delivery rates and prior commitments alongside data in the HEDNA to identify a contribution from the SDNPA that can be sufficiently demonstrated at examination.

## **Conclusion**

I trust this sets out our representations to the current consultation in full and we look forward to engaging in further stages of the Local Plan process.

Yours faithfully,

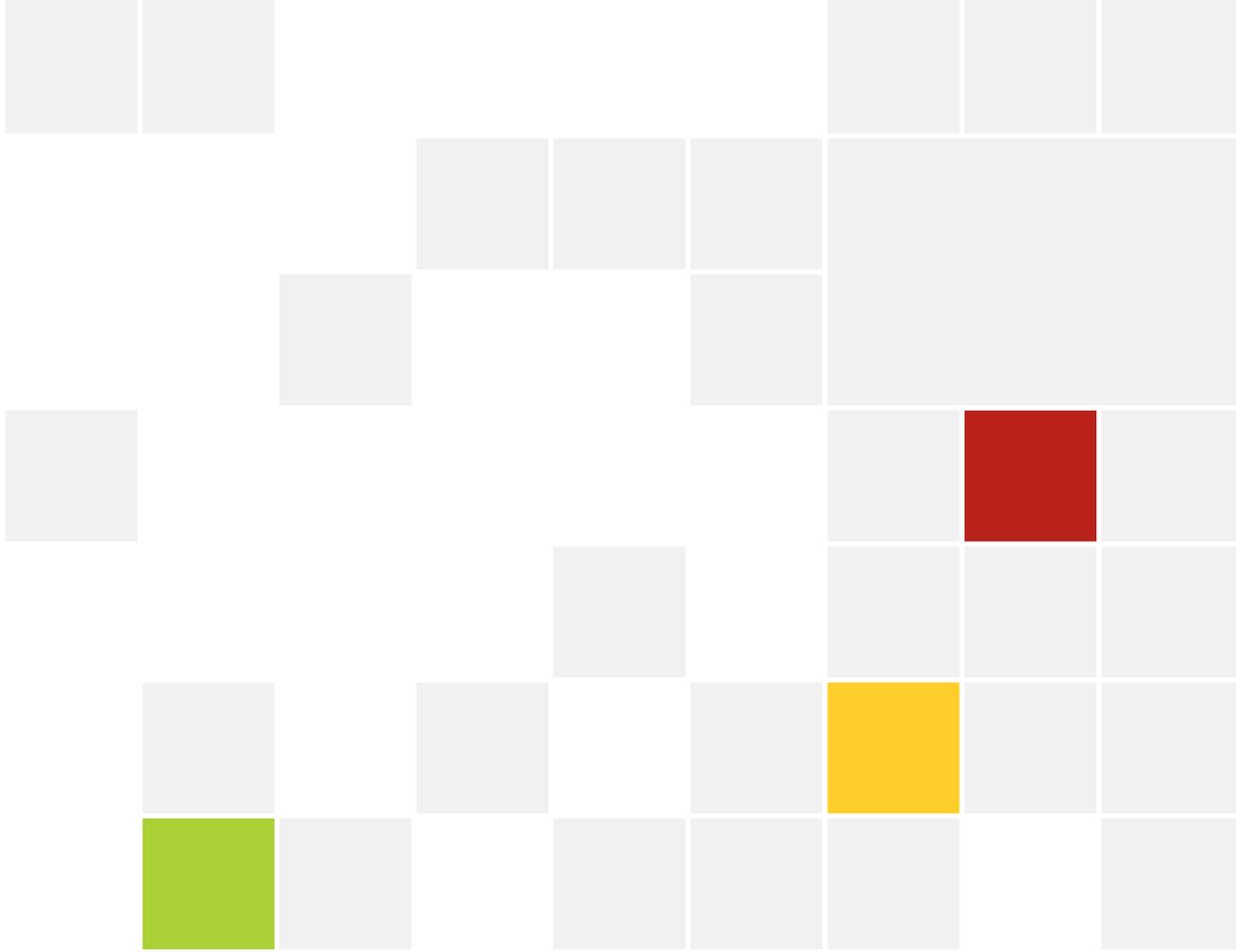


Enc: Site Location Plan

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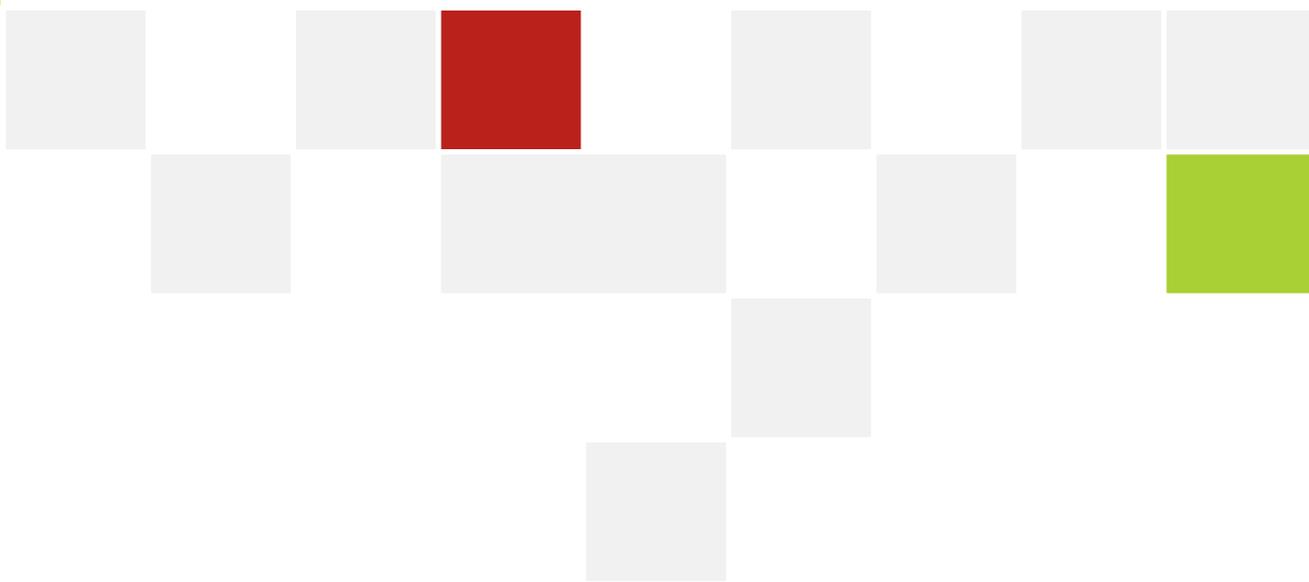
<sup>7</sup> The 2021 SoCG set out a residual housing requirement in EHDC of 486dpa from 2017-2027, and 599dpa from 2027-36, and a housing requirement in the SDNPA of 138dpa and 25dpa for the same periods.

<sup>8</sup> The 2018 SoCG set out a commitment from the SDNPA to deliver 100dpa



# Land North of Gilbert White Way

Representations to the East Hampshire Local  
Regulation 18 Consultation



**Boyer**



## **TABLE OF CONTENTS**

1. Introduction	3
2. Land North of Gilbert White Way, Alton	5
3. Vision and Overview (Questions VIS1, VIS2 VIS3 and OV1)	8
4. Climate Emergency (Questions CLIM1, CLIM2, CLIM3, CLIM5 and CLIM6)	9
5. Population and Housing (Questions POP1, POP2, POP3 and POP4)	12
6. Types of Housing Needs (Questions HOU1, HOU2 and HOU7)	16
7. Infrastructure (Question INF3)	18
8. Development Strategy (Questions DEV1, DEV2, and DEV3)	19
9. Summary and Conclusions	23

# 1. INTRODUCTION

## Background

This representation is submitted by Boyer, on behalf of Wates Developments ('Wates'), who are promoting Land North of Gilbert White Way ('the site'), for allocation in the emerging 'East Hampshire Local Plan, 2021 to 2040' (the 'emerging Local Plan'). A Location Plan is provided at **Appendix 1**. The representations respond to the current Regulation 18 Consultation on the 'Issues and Priorities Regulation 18 Part 1' consultation document, published in November 2022.

Wates welcomes the opportunity to comment on the consultation document and supports the preparation of a new Local Plan, which will shape development within East Hampshire up to 2040. The production of this new Plan is essential to meet future housing needs and address other key priorities, such as promoting sustainable development and addressing the potential impacts of climate change.

It should be noted that we have specifically sought to comment on those policies and matters that are directly or indirectly pertinent to the promotion of Wates' land interests. However, we also comment more widely when appropriate, and where it is considered that this assists in the creation of a Plan which meets the tests of soundness.

## Scope of this Representation

Our comments regarding the site are made in the context of the 'tests of soundness', as set out at paragraph 35 of the National Planning Policy Framework, 2021 ('NPPF'). These tests specify that for a Plan to be sound it must be;

- a) *"Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;*
- b) *Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*
- c) *Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and*
- d) *Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework."*

## Structure of this Report

Consistent with the scope described above, we have structured this response as follows with reference to the relevant Sections of the consultation document. The remaining sections of this report are;

- Section 2 – Land North of Gilbert White Way
- Section 3 – Vision and Overview (Q. VIS1, VIS2, VIS3 and OV1)

- Section 4 – Climate Emergency (Q. CLIM1, CLIM2, CLIM3, CLIM 5 and CLIM6)
- Section 5 – Population and Housing (Q. POP1, POP2, POP3 and POP4)
- Section 6 – Types of Housing Needs (Q. HOU1, HOU2 and HOU7)
- Section 7 – Infrastructure (Q. INF3 and INF3)
- Section 8 – Development Strategy (Q. DEV1, DEV2, and DEV3)
- Section 9 – Summary and Conclusions

## 2. LAND NORTH OF GILBERT WHITE WAY, ALTON

### Site Promotion and Deliverability

Our client controls Land North of Gilbert White Way, which consists of circa 15 hectares of greenfield land located to the north of Alton.

The subject land represents a sustainable and suitable site for residential development and is promoted for allocation in the emerging Local Plan. Part of the land has been promoted through the 'call for site's process, and is identified in the East Hampshire Land Availability Assessment (LAA), with site references LAA/AL-002 and LAA/AL-018 being assigned.

The 'Interactive Map' of sites submitted via the rolling call for sites procedure indicates that site LAA/AL-018 merits further consideration, whilst LAA/AL-002 was excluded from further analysis because the potential to provide an access was 'unknown'.

Wates has subsequently assembled additional areas of adjoining land, with the totality of the controlled land interest being set out at **Appendix 1**. The control of this wider area of land allows for a suitable vehicular and pedestrian / cycle access arrangements to be achieved, with connections being formed to the public highway network, via Gilbert White Way.

A range of other technical surveys and master planning work has been progressed in relation to this site. This has confirmed that it is not subject to 'hard constraints' or major / long-term infrastructure requirements, which would impede its development or undermine its viability. Accordingly, the site is considered to be 'deliverable' (as defined in the NPPF Annex) and can contribute to the supply of land for new homes, within five years.

### Site Characteristics

The promoted site lies on the north side of the settlement of Alton. The land comprises several existing (arable) field parcels, which are separated by existing hedgerows and tree belts.

The land is bounded along its southern boundary by a new residential neighbourhood distributed along Christmas Close and Rowden Way, alongside established residential areas located along Gilbert White Way and Grebe Close. To the east, the site's boundary is formed by Upper Anstey Lane, whilst wooded areas and additional agricultural land lies to the north and west.

Topographically, the site is situated on a south facing slope which extends to more elevated ground to the north, with this northern extent of the land forming a plateau. The southern part of the site extends to approximately 145m AOD, which broadly reflects the elevation of the existing residential areas to the south. At its highest point, the site rises to approximately 180m AOD.

One Public Right of Way (PRoW) transects the south westernmost field parcel, connecting Grebe Close with Old Odiham Road. A further PRoW lies immediately to the north-east of the site linking with Anstey Lane, which further connects with a longer route running along the alignment of a ridge of local high ground linking Row Wood to the north, with Alton to the south.

## **Site Constraints**

In terms of constraints, the site is not subject to any statutory or non-statutory landscape protection designations. The site is also free from Tree Preservation Orders (TPOs) and there are no areas of Ancient Woodland on the land. However, an area of Ancient Woodland lies to the north on the opposite (eastern) side of Anstey Lane.

Whilst further on-site surveys would need to be conducted to support any future planning application, the site is not subject to any prevailing international, national or local-level ecological designations. The land also lies beyond the 5km Special Protection Area (SPA) buffer. As the site largely comprises arable farmland, areas of biodiversity value are largely restricted to boundary hedgerows and trees. Initial analysis therefore suggests that it will be possible to exceed a 10% biodiversity net gain on-site.

There are no Listed Buildings or Scheduled Ancient Monuments within the site or in its vicinity. Likewise, the site is not located within a Conservation Area. The site is also located outside of any 'Archaeological Areas of High Importance' (as identified on the Council's interactive mapping) and is not considered to have high archaeological potential.

Being elevated, the site lies within Flood Zone 1 (based on the Environment Agency mapping), which indicates the land is not subject to significant flood risk from fluvial sources. The land is also largely free from surface water and ground water flood risk constraints. This suggests that flood risk and drainage would not represent a significant impediment to residential development at this location.

## **Settlement and Site Sustainability**

Alton is identified as a 'Market Town' within the Settlement Hierarchy presented in the adopted East Hampshire Joint Core Strategy (also known as Local Plan Part 1). This status is likely to be carried forward, with Table 2 of the 'Settlement Hierarchy Background Paper' (2022) identifying Alton (alongside Liphook) as the most sustainable settlements within the Plan Area, slightly ahead of Whitehill & Bordon. Alton is therefore identified (at Table 3 of the Background Paper) for categorisation as a 'Tier 1' settlement, consistent with the wide range of services and public transport options available there.

Residential development on Land North of Gilbert White Way would be consistent with the concept of the '20-minute neighbourhood' which is expressed in the adopted Alton Neighbourhood Plan and which plays a key role in the Consultation Document. In this regard, the town centre is 15 to 18 minutes' walk from the site, whilst additional local shops, a post office and primary schools are situated within a 5 to 10-minute walk. Indeed, the Wootey Primary School lies in the site's immediate vicinity. Secondary and Further education facilities are available at the Amery Hill School and HSDC Alton, which are situated within a 15 to 20-minute walk of the site.

Accordingly, the settlement generally and the site specifically, are both capable of accommodating growth to address a share of both localised and Plan-wide housing needs.

## **The Proposed Development**

Wates proposes a landscape-led residential development, which is to be provided alongside land for public open space, green infrastructure, biodiversity enhancements.

Details of the emerging design and the response to the site's characteristics and constraints will be set out a Vision Document, which shall be submitted to the separate but ongoing 'Call for Sites' Consultation.

However, in summary, the proposals comprise;

- Approximately 200 dwellings
- A mix of dwelling sizes and types of which up to 40% will be affordable housing (consistent with the adopted requirement);
- A new safe vehicular access from Gilbert White Way at a point which minimises arboricultural impacts;
- Enhanced pedestrian connectivity and access, throughout the site, linking to Public Rights of Way (PRoW) and pedestrian routes along the highway network;
- Extensive and high-quality areas of landscaping, public open space and multifunctional green space, with approximately 7 hectares of Green Infrastructure being provided across this 15-hectare site;
- A scheme design which responds to landscape and visual impact considerations, notably by restricting developable areas to less elevated parts of the site;
- Buffers to allow for the safeguarding and enhancement of trees at the site's boundaries;
- Multifunctional Sustainable Urban Drainage Systems (SuDS);
- Measures to encourage efficient use of resources such as energy and water; and,
- Areas for biodiversity net gain (BNG), exceeding a 10% increase.

A key priority for the proposals is to achieve effective pedestrian connectivity, both to public transport opportunities and to the centre of the settlement. This will ensure successful integration with the existing settlement and shall provide future residents with convenient access to the various services and amenities that Alton benefits from.

### **3. VISION AND OVERVIEW (QUESTIONS VIS1, VIS2 VIS3 AND OV1)**

#### **Draft Vision (Questions VIS1, VIS2 and VIS3)**

Reflecting the language used in this question, Wates are 'unhappy' with the Vision as currently drafted overall, but endorse aspects of it. Indeed, Wates supports the move towards a zero-carbon economy and agrees that housebuilding must play a key role in supporting wider policy initiatives. Wates also supports other aspects of the proposed Vision, particularly the emphasis on creating healthy, accessible, and inclusive communities, and providing high-quality homes.

However, the Vision (as drafted) does not make it clear that housing needs will be fully met. This is a notable omission, as the emerging Local Plan and evidence base does not contend that housing needs are not capable of being met within the Plan-area. Indeed, as the Plan-area excludes land within the South Downs National Park (SDNP), it cannot be said that there are prima facie constraints which are prevalent to the extent that these might mean the housing requirement should be reduced.

Therefore, the Vision should be revised to reflect the intention to provide sufficient housing to address the needs of current and future communities. As indicated on page 11 of the Consultation Document, a previous iteration of the Vision referred to providing a "Front Door for Everyone". Wates consider that this wording (or an appropriate equivalent) should be reincluded within the content of the Vision.

#### **Overview Consultation Question (Question OV1)**

Wates considers that the 'key issues and priorities' presented in relation to Question OV1 are equally important and cannot be disaggregated. However, Wates do consider that 'population and housing' and fully meeting housing needs is a fundamental objective that this Plan must achieve. This is particularly the case, as future residential development will enable the delivery of new infrastructure, and help the Plan to meet Climate Change and other environmental objectives, such as biodiversity net gain and nature recovery.

## 4. CLIMATE EMERGENCY (QUESTIONS CLIM1, CLIM2, CLIM3, CLIM5 AND CLIM6)

### Question CLIM1

Yes. Wates agrees that new development should avoid any net increase in greenhouse gas emissions, wherever practicable, and supports the move towards net zero carbon development. However, whilst the transition to renewable sources of energy is taking place at a markedly increasing pace, consideration does have to be given to the timescales for achieving this in practice.

In this respect, it is not clear that the housebuilding sector, the supporting supply chain, and workforce, will be capable of meeting a potential net zero policy requirement at the point the Local Plan is envisaged to be adopted, in 2025. A phased transition is therefore likely to be necessary.

It is notable that many major housebuilders have signed-up to the House Builder Federation (HBF) 'Future Homes Delivery Plan', which sets out how the industry will transition to net zero carbon. This process of transition requires an interim step, with new homes being expected to be '*net zero carbon ready*' in the short-term, and fully net zero carbon in the medium-term.

Given the remit of the HBF, the Future Homes Delivery Plan provides a good indication of what the housebuilding industry considers to be possible. On this basis, Wates recommends that any future Local Plan policy requirements (as may be proposed to help address the Climate Emergency) reflect this necessary intermediate step.

A transitional approach would also reflect the fact that most residential developments can only become fully net zero, when the wider power-generation network is free from carbon-based power stations. For housing developments to become net zero in advance of the transition of the wider grid, they effectively need to achieve self-sufficiency in terms of energy generation. In most instances, achieving self-sufficiency will simply not be practical.

Impacts on viability will also require careful assessment as the emerging Local Plan progresses to future consultation stages. Achieving net zero development introduces additional build costs, which are in addition to rising costs associated with the current inflationary environment. Such costs need to be fully understood and reflected in the Local Plan's strategy and policy requirements, in order to ensure that it is capable of successful implementation.

### Question CLIM2

Wates considers that all potential priorities listed in relation to Question CLIM2 are important. However, on a point of clarity, no development can be 'zero carbon' (the language used in the table for CLIM2) but rather a development might be 'net zero carbon'. This is an important distinction, as all building materials and construction processes embody some carbon.

### Question CLIM3 and CLIM3a

No. Wates are concerned that this question cannot be properly answered, as the Net Zero Carbon Study (from which the potential definition of 'net zero carbon development' derives) has

not actually been published and made publicly available. It is therefore not possible to examine the analysis provided by EHDC's appointed technical consultants, nor understand their conclusions.

Nonetheless, Wates considers that net zero carbon development should be defined in terms of the operational energy requirements of a development (e.g., the energy usage associated with the occupation of a home). This is recommended, as the operational efficiency of a dwelling can be estimated with relative precision.

In contrast, it is far more challenging to estimate and control (with a reasonable degree of accuracy) the volume embodied carbon associated with a building's production and construction stages. In the absence of the relevant evidence base report, it is not clear how EHDC envisages such estimates could be arrived at.

#### **Question CLIM5**

Wates considers that if localised policies and building standards are to be progressed (to address and mitigate climate change impacts), then they are best included within the strategic policies of the new Local Plan. If this matter is delegated to future Neighbourhood Plans and Design Codes, then this may lead to a proliferation of different (and potentially inconsistent) requirements across the district. This would introduce considerable ambiguity and is likely to impede the Plan's delivery and effectiveness, without any clear benefit to the public interest.

#### **Question CLIM6**

Wates is 'happy' with the proposal to apply the concept of a 20-minute neighbourhood to influence the spatial strategy and general location of future development. Indeed, the concept is broadly consistent with the requirements of NPPF 105 which states that;

*"Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health."*

Wates further considers that the application of the 20-minute neighbourhood concept, leads logically to a spatial strategy that concentrates growth at the largest and most sustainable settlements within the Plan-area. Such settlements clearly include Alton, a town which is identified as a top-tier settlement in the evidence base for the emerging Local Plan.

Additionally, the Vision Document (submitted separately to the Call for Sites consultation) includes a 'facilities audit plan' to identify which services are situated within a 20-minute walk of Land North of Gilbert White Way. This confirms that the full range of day-to-day services and amenities that future residents of the site would require, can be found within a 20-minute walk. Likewise, many services are located even closer to the site.

Nonetheless, Wates caution that the 20-minute neighbourhood concept should not be applied in too rigid a manner. This point is made in relation to the Settlement Hierarchy Background Paper, which at Appendix E (Map 2) identifies a 20-Minute Neighbourhood Area, which is focused on the Alton's centre and surrounds.

Whilst a significant part of Wates promoted land interests do fall within the identified potential boundary of the 20-minute neighbourhood, the approach to site selection and allocation does also need to be sufficiently nuanced to account for those services and facilities which are located within a 20-minute walk of the site in question (i.e., rather than just from the centre of the existing town).

This comment is made, noting that Alton will invariably need to accommodate strategic growth (on greenfield land) to address housing needs in a manner consistent with the emerging Settlement Hierarchy. Therefore, it is important that consideration is given to how sustainable neighbourhoods can be created in an 'edge of settlement' context. This includes (for example) strategies to promote the use of public transport, creating safe cycling routes and other travelling planning measures.

## 5. POPULATION AND HOUSING (QUESTIONS POP1, POP2, POP3 AND POP4)

### Question POP1, POP1a and POP2

The NPPF (at paragraph 61) is clear that the Standard Method for calculating housing need should be applied unless exceptional circumstances suggest otherwise. Furthermore, although the current consultation on the Levelling-up and Regeneration Bill and potential revisions to the NPPF suggest that the Standard Method may be revised in the longer-term, it is apparent that (in the medium-term) it will remain the starting point for establishing a Local Plan's housing requirement.

The Housing Needs and Requirement Background Paper (2022), which forms part of the evidence base, identifies a Standard Method Local Housing Need (LHN) figure of 632 dpa. However, the baseline data for the Standard Method (household projections and affordability ratios) is only available on a district-wide basis, which (in this instance) does not conform to the relevant Plan-areas of East Hampshire and the SNDP.

The Housing and Economic Needs Assessment Update (HEDNA) (2022) further indicates how district-wide need can be calculated and then disaggregated between the Plan-area and the separate SDNP. Wates do not object to the disaggregation of need between the two Authorities. This is particularly so, noting that the analysis in the HEDNA arrives at an overall calculation (621 dpa, across the East Hampshire and SNDP areas) which is very similar to the unadjusted LHN figure (632 dpa).

Nonetheless, it is important that the need disaggregated to the SDNP is actually met through the intended review of the SNDP Local Plan or is otherwise accommodated within the emerging East Hampshire Local Plan. Unfortunately, there is nothing within the evidence base for this consultation which confirms whether the SNDP expects to accommodate the level of need identified in the HEDNA. The most recent 'Duty to Cooperate Framework' (July 2022) simply indicates that the two Authorities intend to engage on the matter.

A more fundamental concern, is that the HEDNA identifies a need for 613 affordable homes per annum<sup>1</sup>. This equates to almost all of the Standard Method annualised requirement. Noting that the Consultation Document envisages an affordable housing tariff of 40%, the housing requirement envisaged in the consultation document will result in a significant level of unmet need for affordable housing.

The Planning Practice Guidance<sup>2</sup> is clear that increasing the overall housing requirement may be necessary where this helps to meet the need for affordable housing. Wates do not accept the arguments presented by EHDC (in the Background Paper or the HEDNA), that an uplift in the overall housing requirement would not successfully increase the supply of affordable homes.

Indeed, such an uplift may be achievable if the Local Plan's spatial / housing allocation strategy were aligned to this objective. For example, the Local Plan could prioritise the allocation of

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<sup>1</sup> Across the Study Area, which includes the area within the SNDP which falls within the East Hampshire District, but lies outside of the emerging Local Plan-area.

<sup>2</sup> PPG ID: 2a-024-20190220

those sites that are most likely to be free from hard constraints or abnormal development costs. This could (and should) be a guiding principle in the site selection process. EHDC could also afford greater priority to the provision of affordable housing, when considering (through the Viability Assessment<sup>3</sup>) the cumulative infrastructure requirements and development standards that it seeks to apply

Likewise, the Consultation Document, Background Paper, and HEDNA, all appear to adopt a 'zero-sum' approach to the notion of increasing the housing requirement to help meet affordable housing needs. For example, at paragraph 4.16 of the Background Paper it is stated that;

*"...taking into account the Council's adopted affordable housing policy at 40%, overall housing need would have to be equal to sum [sic] 1,535 homes per annum if the full extent of affordable housing need was to be met. Based on the historic average affordable housing delivery at only 25%, local housing need would have to be in excess of 2,452 homes per annum."*

Yet, the consultation materials provide no consideration of whether a more modest uplift in the overall housing requirement might be feasible and would positively increase the number of affordable dwellings provided, even if this provision still fell short of the full scale of need identified. Indeed, noting that the consultation is not supported by a draft Sustainability Appraisal, these seemingly obvious 'reasonable alternative' options appear to have been arbitrarily discounted.

Likewise, Wates does not agree that the affordability uplift in the Standard Method calculation in some way offsets a very significant under-provision of affordable housing (as seems to be contended at paragraph 4.17 of the Background Paper). The PPG is clear that affordable housing needs are calculated separately, using a distinct methodology, and is equally unambiguous in recommending that an increase in the overall housing requirement can help increase the supply of affordable homes.

Similarly, Wates do not agree with the suggestion made in the Background Paper, that the 'affordability uplift' (embedded within the Standard Method's mathematical calculation) provides an excuse for not seeking to fully meet affordable housing needs. It is not satisfactory to simply assume (as EHDC appears to) that potential longer-term improvements in affordability, alleviate the obligation to address the demonstrable need for more affordable dwellings in the near-term.

The socio-economic implications of housing unaffordability and the under provision of affordable homes (such as overcrowding and homelessness) are well documented in the HEDNA. It is also plainly apparent that East Hampshire District is a profoundly unaffordable place to live. The ONS datasets for median and lower-quartile house price affordability ratios for East Hampshire are 14.51 and 16.41 respectively. These figures are well above the average for England (9.05 and 8.04).

In this context, EHDC must properly assess and objectively consider the potential to increase the housing requirement to better meet affordable housing needs. Such an over-provision is also necessary to provide flexibility and choice in the supply of new homes, and to ensure the effectiveness of the Plan.

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<sup>3</sup> Which Wates understands will be prepared to support future Local Plan consultations.

### **Question POP3 and 3A**

The emerging Local Plan should be progressed on a precautionary basis, on the assumption that the SNDP will not meet its housing need in full. The current NPPF (2021) is clear that the SNDP is expected to address localised housing needs, but only to the extent that this is compatible with the special protections afforded to the National Park. The Government's consultation on the Levelling-up and Regeneration Bill and the draft NPPF, further suggests that this restrictive policy position will be further strengthened.

However, and notwithstanding our previous comments concerning the Duty to Cooperate Framework, the level of unmet need arising in the SDNP is in any case unlikely to be significant. Indeed, the Consultation Document and Background Paper appear to suggest that an unmet need of perhaps 15 dpa could arise. Therefore, in order that the emerging Local Plan should be 'positively prepared', EHDC should assume that approximately this level of unmet need from the SNDP will arise and accommodate this through one or more additional allocations.

### **Question POP4 and 4A**

Several authorities within the southern extent of Hampshire are unable to meet their own housing requirement. The Partnership for South Hampshire (PfSH) Statement of Common Ground (SoCG) (considered by the PfSH Joint Committee in October 2021, and referenced in the Consultation Document) already identifies a shortfall across the area amounting to 13,000 dwellings, with this figure having worsened from 10,750 dwelling shortfall identified in the previous 2020 SoCG.

More recently, the latest PfSH Statement of Common Ground (considered at the Overview and Scrutiny Committee meeting on 30 November 2022) sets out the significant increase of unmet need to some 20,000 dwellings (up until 2036). Importantly, the papers for Committee also indicate that of the Southern Hampshire Local Authorities, only Fareham and Test Valley have a 'surplus of supply' and Winchester is noted to be at an 'equilibrium'. All other Authorities are identified as being in 'deficit', with a corresponding shortfall in future housing supply.

Furthermore, Southampton City Council (SCC) has recently consulted on their 'City Vision' document, which is their emerging Local Plan. In this document, SCC set's out that its overall housing need is 26,500. The document indicates that SCC are only planning to accommodate for 16,800 homes (with the latest PfSH SoCG setting out a supply of 14,464 dwellings, between 2022 and 2026).

There is then a very significant volume of unmet need arising within the sub-region, which will need to be provided for or otherwise go unaddressed. Furthermore, whilst Wates acknowledges that the Government has signalled that the Duty-to-Cooperate may be abolished, it is nonetheless envisaged to be replaced by an 'alignment policy'. Accordingly, and noting the longstanding cooperation and engagement through the PfSH (and the well-understood cross-boundary issues), there is still likely to be a requirement for East Hampshire District to accommodate a quantum of the unmet needs arising.

Therefore, in answer to the question, EHDC should 'offer to assist with all unmet needs, regardless of scale and location'. This is necessary, in order that East Hampshire

accommodates an equitable share of housing needs that will otherwise fail to be addressed. Indeed, this is particularly necessary noting the cross-boundary housing market geographies and functional economic patterns, that are identified in the HEDNA and Background Paper, and which underscore the need for ongoing collaboration through the PfSH.

## **6. TYPES OF HOUSING NEEDS (QUESTIONS HOU1, HOU2 AND HOU7)**

### **Questions HOU1 and HOU1a**

The NPPF (at paragraph 62) is clear that Local Plan's should address the needs of different groups within the community. This includes identifying and meeting the needs of older people. It is appropriate that the new Local Plan includes a policy concerning the provision of accommodation for older people.

Wates agree this policy should indeed identify a specific target for the supply of specialist accommodation and set out a (district-wide) tenure / format mix. However, it is important that the policy allows for sufficient flexibility, recognising that it may not be possible to achieve a diverse mixture of tenures and accommodation formats within individual proposals.

For the envisaged policy to be 'effective' (as a test of soundness) Wates recommends that specific sites for specialist older people's accommodation are identified through the Plan. Indeed, the identification of a pipeline of new developments will provide greater certainty that identified needs for older persons accommodation will be met.

Wates can confirm that Land North of Gilbert White Way is promoted on a flexible basis and is capable of accommodating specialist older people's accommodation, as part of a wider residential development. We would be happy to discuss this proposition with the Planning Policy Team.

### **Questions HOU5 and HOU5a**

Wates agrees that the Local Plan should specify a target percentage for the provision of smaller homes. This should be reflected in a general policy on the housing mix that will be sought. However, Wates advise that any such policy should be worded to allow for specific development proposals to respond to a site's location, features, and the local character of the area.

For example, there may be greater potential to provide larger numbers of smaller (1 and 2-bedroom) dwellings within urban flatted schemes, whilst 3 and 4-bedroom dwellings (being larger) will tend to be suited to more substantive 'edge of settlement' developments.

Therefore, flexibility (embedded within the policy's wording) is necessary to ensure that a development's density and design responds appropriately to its context, as is consistent with Sections 11 and 12 of the NPPF. This is also reasonable, noting that the policy's underlying objective (as set out in the Consultation Document and evidence base) is to ensure a diversity of housing across the overall Plan-area.

### **Questions HOU6 and HOU6a**

Consistent with our response to HOU5 and HOU5a, it is important that all developments provide a mixture of dwelling types and sizes. However, there is often less scope to achieve this on a small-scale development. In contrast and notwithstanding the need for flexibility, Wates agrees that a policy requiring a broad housing mix could be more rigorously applied to

applications for non-minor developments (i.e., over 10 units). Indeed, larger scale developments comprising several hundred homes, are typically able to provide a diverse mixture of housing formats and tenures.

### **Questions HOU7 and HOU7a**

The policy requirement for affordable housing provision needs to be informed by a Plan-wide Viability Assessment. This Assessment must account for the cumulative costs associated with the Plan's envisaged policy requirements (including those relating to net zero-carbon building standards).

Therefore, until a new Viability Assessment has been prepared, Wates cannot offer a firm view on whether the suggested 40% affordable housing requirement is feasible on a Plan-wide basis. Notwithstanding this caveat, Wates considers that (based on adopted policy requirements) a 40% affordable housing tariff is likely to be viable on most 'greenfield sites', which are not subject to significant constraints or abnormal costs. This includes Wates' land interests at Land North of Gilbert White Way, Alton, where 40% of the proposed new homes will be affordable.

However, as noted at paragraph 4.16 of the Housing Needs and Requirement Background Paper (2022), EHDC has historically only been able to secure an average of 25% affordable housing provision. This reflects the impacts of prior approval permitted development rights (allowing the change of use of existing office space), that national exemption of minor developments from needing to provide affordable housing, and reduced viability associated with developments on previously developed sites.

Therefore (and consistent with Wates' response to Questions POP1 and POP2), it is essential to that EHDC gives due consideration to increasing the overall housing requirement (and tests this as a 'reasonable alternative'), to facilitate the delivery of additional affordable housing, without detriment to viability. Likewise, the Plan should focus on allocating those sites that are most likely to be capable of delivery, whilst also complying with the requirements of the relevant affordable housing policy. Land North of Gilbert White Way is one such site.

## 7. INFRASTRUCTURE (QUESTION INF3)

This consultation question and the relevant supporting text do not appear to provide a definition of what is regarded as a 'small', 'medium', or 'large-scale site'. However, from the subsequent Development Strategy questions, Wates assume that a 'large site' means one that can accommodate 600 homes or greater.

On this basis, Wates consider that medium and large sites offer the greatest potential to secure new or improved infrastructure, without impediment to viability, when compared to developments on smaller sites. However, it must be recognised that larger-scale sites require extensive masterplanning and can be dependent on the provision of new strategic infrastructure, which can take many years to bring forward.

Therefore, the Plan will need to allocate a diversity of sites of different sizes (small, medium, and large), to meet varied policy objectives and to sustain the supply of new homes throughout the Plan-period, as well as to deliver new infrastructure. This approach would be consistent with NPPF paragraph 69, which states;

*“Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly.”*

As a separate remark, the Consultation Document appears to define infrastructure primarily in terms of 'hard provision', such as new schools, health facilities, etc. Whilst that is perhaps the public's perception of what infrastructure means, the Plan strategy (and approach to site selection) should recognise the increasing importance of allocating sites that can provide significant new Green Infrastructure.

In this respect, a key advantage of medium and larger-scale sites is that these typically offer greater scope for holistic masterplanning and the provision of multifunctional Green Infrastructure, as well new parkland and pedestrian and cycle routes. Through these embedded measures, such sites are better able to address the Climate Emergency and provide net gains in biodiversity, thereby supporting the guiding Vision and objectives of the Plan.

Accordingly, whilst the suite of allocations in the Plan must be varied, Wates nonetheless recommend a weighting towards the development of sites, that are of a scale sufficient to facilitate new infrastructure, but not so large and complex that they are at risk of not coming forward within the Plan-period.

Land North of Gilbert White Way represents one such site, as it is capable of delivering approximately 200 homes, alongside new infrastructure provision particularly to address the Climate Emergency and the emerging environmental objectives of the Plan.

## 8. DEVELOPMENT STRATEGY (QUESTIONS DEV1, DEV2, AND DEV3)

### Questions DEV1 and DEV2

The Consultation Document sets out 4 options concerning the potential distribution of future housing growth across the Plan-area.

On page 61 of the Document, it is quite rightly acknowledged that the approach to the allocation of sites will be more nuanced in practice, as site-specific opportunities and constraints are accounted for.

Nonetheless, Wates agrees that the Plan does need to be shaped by an over-arching strategy for distributing new housing and expresses the following preferences, in order of priority;

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

Wates' preferences are explained below, with comments being provided in respect of each of the options presented.

#### Option 2 - Concentrate development in the largest settlements (Preferred)

The NPPF (at paragraph 11) is clear that Plan's should promote sustainable patterns of development, in order to align growth with infrastructure and to help mitigate and adapt to the impacts of climate change. Similarly, NPPF paragraph 105 requires;

*"Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health."*

In the case of East Hampshire, the Settlement Hierarchy Background Paper (2022) identifies Alton (equally with Liphook) as the most sustainable settlement within the Plan Area, with Whitehill & Bordon being regarded as slightly less well provided for in terms of existing services. At Table 3 of the Background Paper, these settlements are identified as forming the top-tier of the envisaged Settlement Hierarchy<sup>4</sup>.

A wide range of services are available within Alton, and the accessibility mapping provided at Map 2 of the Background Paper indicates that areas of undeveloped land around the settlement lies within a 20-minute walk of key services. This includes Land North of Gilbert White Way. It is also the case that the availability of public transport at Alton provides far greater opportunities to access 'key services' and 'other services' (defined as those accessed on a daily and weekly basis), when compared to many smaller settlements.

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<sup>4</sup> Note, the diagram at page 67 of the consultation document appears to infer that Liphook will be classed as a Tier 2 Settlement. This apparent conflict with the Settlement Hierarchy Background Paper (2022) should be clarified.

On a point of clarity, Wates does not concur with the point made on page 59 on the Consultation Document, which suggests that Option 2 would be less effective at “mitigating greenhouse gas emissions”, when compared to options which would see growth distributed to smaller settlements. Indeed, there is no objective evidence with the consultation documentation to support this assertion.

To overcome this, Wates recommends that EHDC commissions a study to objectively examine the volume of emissions associated with each option, taking account of existing and forecast transport patterns. Based on our experience elsewhere, this would likely identify a strong correlation between particulate emissions and real-world travel behaviours, with shorter private vehicular journey times being associated with lower carbon emissions.

Put more simply, the Plan should recognise that some people will still travel by means of private vehicle even where alternatives are available and promoted. As such, it is preferable that private vehicular travelling distances are reduced. It is therefore relevant that such journeys will generally be shorter where these occur *within* larger settlements, when compared to a journey *between* a lower to a high-tier settlement.

Therefore, and in the absence of clear evidence to the contrary, it may be incorrect to assert that development with 20-minutes of the centre of a lower-tier settlement (that lacks many services), will more effectively reduce greenhouse emissions, when compared to a strategy that directs new development to top-tier settlements, which benefit from a wide range of services and employment opportunities.

Given one of the primary objectives of the Plan is to reduce greenhouse gas emissions, it is important that this matter is properly understood and evidenced, such that its spatial and housing distribution strategies can be duly informed.

#### *Option 1 - Disperse new development to a wide range of settlements (Second)*

A strategy based on dispersal would bring some advantages, as it would result in a wide range of sites of different sizes being allocated at different settlements. This will provide greater certainty that the Plan will be effective at sustaining a housing land supply throughout the Plan-period. For this reason, any strategy taken forward should make provision for some degree of dispersal to settlements at different tiers within the Settlement Hierarchy.

However, Wates do not consider it appropriate to base the entire spatial strategy around a general principle of dispersal. Such an approach would be overly simplistic and harmful. Indeed, one consequence (of this spatial option), would be the allocation of sites with less regard to the prevailing constraints. This is noting that many of the villages within the Plan area are subject to significant environmental and flood risk designations, which would appear to render them less capable of accommodating substantive development. This issue is indeed acknowledged at pages 6 and 7 of the ‘Spatial Development Options Background Paper’ (2022).

Likewise, many settlements within the envisaged Tier 2 and Tier 3 categories are less accessible to public transport routes and inherently benefit from a more limited range of local services. Therefore, Wates are concerned that a dispersal-based spatial strategy will result in additional longer distance trips being made, as future residents seek to meet their daily needs

by travelling to Tier 1 settlements (a matter that is indeed acknowledged at page 54 of the Consultation Document).

This in turn is likely to result in additional greenhouse gas emissions, which (in many instances) may off-set any potential localised walkability benefits. It should not simply be assumed that the concept of 'living locally' and the 20-minute neighbourhood will automatically result in reduced emissions. This is particularly the case where such concepts are applied to locations with limited facilities and public transport options, such that travel behaviours will still revolve around the private motor vehicle.

Therefore, and consistent with our previous comments, this spatial option would benefit from detailed technical analysis, to help quantify the volume of greenhouse gas emissions associated with it. This should take account of the anticipated propensity to travel by private vehicle, versus sustainable transport modes. That will help EHDC to understand which of the lower tier settlements could accommodate some development, without unduly contributing to Climate Change.

As a separate consideration, a diffused strategy based on dispersal to numerous settlements is less likely to facilitate the provision of new infrastructure, as the individual developments would be of a limited scale, and may lack the critical mass to support to new services or enhancements. Likewise, whilst the delivery of affordable homes at smaller settlements may certainly address localised needs, the need for affordable housing is greatest within the District's urban areas.

Indeed, it is relevant that most of the employment opportunities are found within the district's larger settlements (as confirmed in the Settlement Hierarchy Background Paper). This is a salient consideration, as those within the lower income brackets have a reduced propensity to own private vehicles. As such, there are strong socio-economic and equality benefits associated with providing new housing at Tier 1 settlements (where jobs are with walking or cycling distance, or are accessible by frequent public transport routes), which a dispersed development strategy would not address as effectively.

### *Option 3 - Distribute new development by population (Third)*

A strategy which would distribute development in line with an approximation of existing populations appears relatively arbitrary, as it would not necessarily result in the allocation of the most suitable sites available for development. A spatial strategy based on this approach would also not correlate directly with the Settlement Hierarchy, such that it is unlikely to effectively address the sustainability and Climate Emergency objectives of the Plan.

Furthermore (as is acknowledged in the Consultation Document), it is relevant that some locations within the District are subject to environmental constraints, relating to the Special Protection Area (SPA) and Special Areas of Conservation (SAC). Likewise, the southern and eastern parts of the Plan-area are impacted by flood risk constraints, as is illustrated in the East Hampshire Strategic Flood Risk Assessment (SFRA) 2022.

Wates therefore advise against this option and advocate for a more deliberative strategy, that is properly aligned with the Plan's emerging Vision and objectives.

Concentrate development in a new settlement (Option 4)

Wates does not consider that a new settlement is required. Notwithstanding our previous comments concerning the housing requirement and the need for this to be increased, at this stage the Consultation Document only proposes the delivery of 3,405 additional homes, taking account of current commitments.

For a new settlement to achieve the level of self-containment that would be aspired to (consistent with EHDC's Climate Emergency objectives), it would need to be of a significant scale. The Consultation Document (at page 60) identifies "1,500+ new homes" as the minimum threshold for consideration. However, this scale of development is unlikely to be able to support new strategic infrastructure provision that may be required as a precursor to implementation.

A true 'new settlement' would need to be larger with 3,000 homes likely representing a more realistic minimum size. A development of this scale would account for the majority of the identified residual housing requirement. In this context, to over-concentrate future growth into a new settlement would create a risk to the Plan's capacity to successfully sustain a housing land supply across the plan period.

Whilst the Consultation Document suggests that phasing may help to achieve early delivery, Wates considers this unlikely. Indeed, the frequently cited report 'Start to Finish (Second Edition) (Lichfields, 2020) suggests that the average time from the validation of the first planning application on a strategic site, to first completions, is 8.4 years.

Therefore, noting the potential requirement for pre-application engagement, community and stakeholder consultation, masterplanning and the delivery of potential pre-requisite infrastructure, it could easily take 10 years or more (from the Local Plan's adoption) for a new settlement to begin delivering new homes. This would suggest that the housing requirement may not be successfully met within the Plan-period.

As there does not appear to be a particular necessity for a new settlement to be created in East Hampshire (and other options for meeting housing needs clearly exist), Wates consider that the risks of delayed delivery outweigh the potential benefits. This option should be discounted.

## 9. SUMMARY AND CONCLUSIONS

These representations have been prepared by Boyer on behalf of Wates Developments, in response to EHDC's 'Issues and Priorities Regulation 18 Part 1' Consultation

Wates supports the preparation of a new Local Plan for the East Hampshire District, which will contribute to the provision of new housing and future sustainable development. Through these representations Wates has sought to respond to the consultation questions and identify potential areas where emerging strategies, objectives and policies require reflection, in order that the Plan may ultimately be found sound at a future Examination.

With respect to the proposed Vision, nothing in the Consultation Document or the evidence base suggests that meeting the Standard Method LHN figure would not be possible. As such, the Vision should be worded to reflect EHDC's intention to meet identified minimum housing needs in full. This will help to demonstrate that the Plan is 'positively prepared', as a test of soundness.

As such, it is necessary that the overall housing requirement be revisited to ensure that a sufficient buffer is provided, over and above the minimum Standard Method figure, in order to provide an appropriate buffer. Likewise, the potential to increase the housing requirement to help facilitate the provision of additional affordable housing must be properly tested. This is essential, in view of the scale of affordable housing needs that will otherwise go unmet. Likewise, if the sustained general affordability issues presenting in the District are to be meaningfully corrected, increasing delivery of new homes will be an integral and important strategic mechanism for the Council to employ.

To address the Duty-to-Cooperate and any potential successor arrangement, the Plan should make provision to accommodate any unmet needs arising in the SDNP. Likewise, provision should also be made to address a proportion of the very significant level of unmet housing needs arising in the PfSH area. This is vital, noting the prevailing cross-boundary housing markets and functional economic geographies within South Hampshire.

With respect to the options for distributing development, Wates maintains that Option 2 ('concentrate development in the largest settlements'), is the most sustainable strategy for addressing housing needs. Alton, as a top-tier settlement, must play a major role in accommodating future growth, taking account of the wide range of services, employment opportunities and transport facilities available there.

Clearly, the Plan must allocate a diverse range of sites in order to ensure deliverability and hence 'effectiveness' as a test of soundness. However, new hard and green infrastructure can be best facilitated through the allocation of medium and larger scale sites for development. This is particularly the case at the largest settlements within the District, where new infrastructure can complement existing provision.

The approach to the Climate Emergency is supported in principle. However, it is essential that any policies applying additional or uplifted development / building standards are properly evidenced, technically feasible and viable. It is also important that the Plan allows for a transition to net zero carbon development, which includes appropriate intermediate steps. This

will ensure that the development industry and construction supply chain is able to adapt, whilst continuing to deliver new homes.

Furthermore, whilst the concept of the 20-Minute Neighbourhood is certainly endorsed, this must be applied in a way that considers the availability of services when measured from a potential housing site, rather than simply the centre of a settlement. Regard must also be had to the availability of public transport, travel patterns and distance of likely vehicular journeys. Related to this, the Plan would benefit from additional specialist technical evidence that tests and quantifies the extent to which the explored spatial growth options minimise carbon emissions overall.

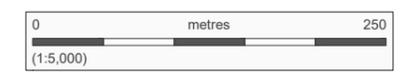
Within this context, Land North of Gilbert White Way represents a suitable and sustainable site for residential-led development, which would create a walkable residential neighbourhood which integrates with the existing town of Alton. Significant areas of open space and land for ecological enhancements can be provided, to exceed the requirement to achieve a 10% biodiversity net gain, and to support wider environmental objectives.

Wates are also able to offer flexibility regarding the housing formats that could be accommodated at the site, which is considered capable of accommodating specialist accommodation for older persons, as well as general residential development. Wates would be happy to meet with officers to discuss EHDC's potential requirements.

# APPENDIX 1 – LOCATION PLAN



— Redline boundary

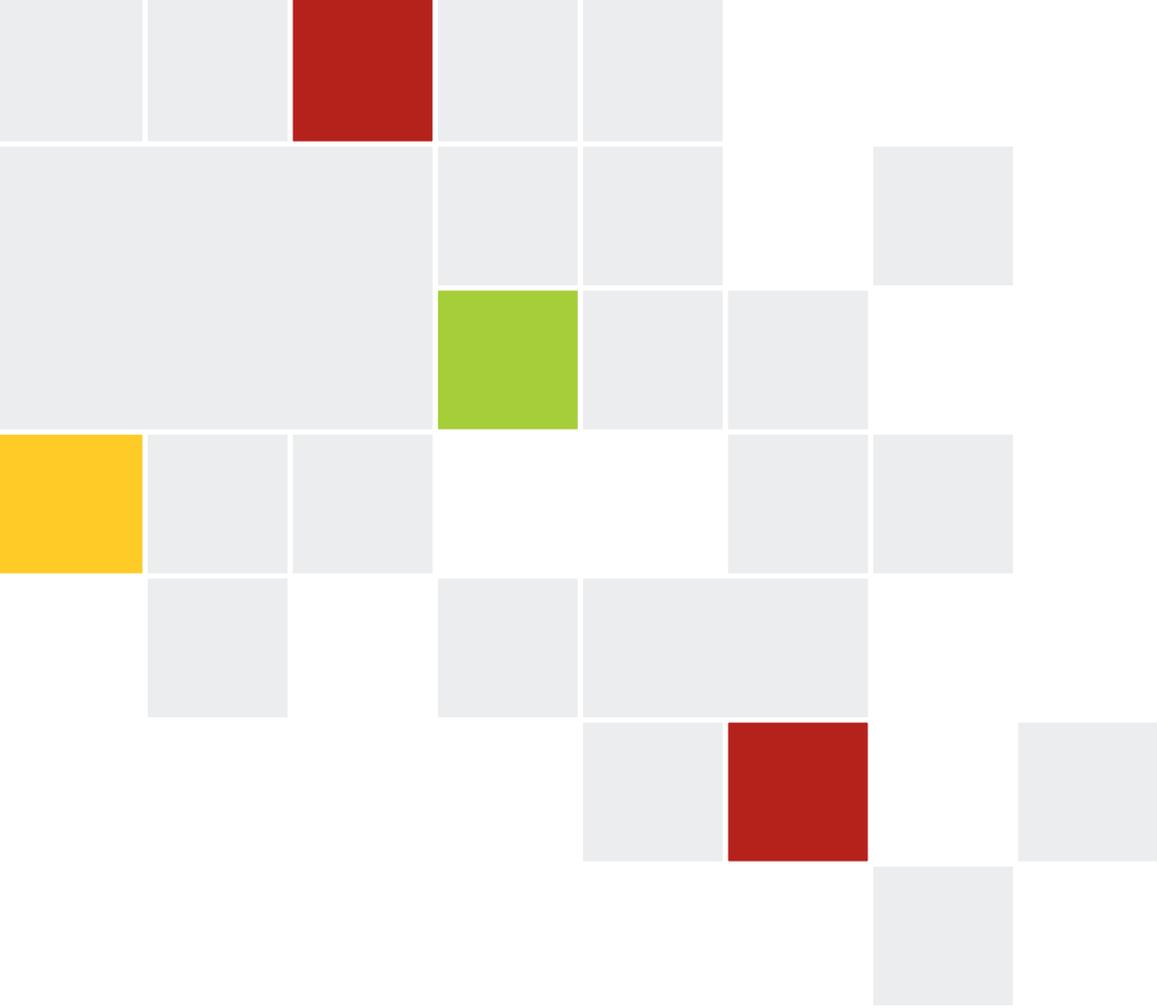


Project  
Land north of Gilbert White Way

Drawing Title  
Site Location Plan

Date  
10/01/2023

Scale  
1:5,000 at A3



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GU31 4EX

16th January 2023

Dear Sir/Madam

**Representations to the East Hampshire Local Plan 2021-2040 - Issues and Priorities Regulation 18 Part 1  
November 2022**

These representations relate to Cala Homes (Thames) interest in Land at Five Acres, Ropley and are in response to the East Hampshire Local Plan (EHLP) Issues and Priorities Regulation 18 consultation (Nov '22).

We have previously engaged with the Council regarding the suitability of the site for development including the preparation of a vision document and accompanying evidence base reports<sup>1</sup>. We do not seek to replicate this previous work within this submission however in summary, the site is suitable for the delivery of approximately 50 - 60 new homes. The site is available for development and would be able to come forward early in the Local Plan period. The site was a draft allocation (site ref. SA30) in the previous Regulation 18 Draft Local Plan (Feb 2019), which reiterates the deliverability and suitability of the site.

At this stage our representations focus on the proposed spatial strategy and the suitability of Ropley as a location for residential development. We reserve the right to comment on development management and site specific matters as the Local Plan process continues.

***DEV1: Development Strategy and Spatial Distribution***

Of the 4 options set out within the consultation document we consider that Option 1 (disperse new development to a wider range of settlements) is the most appropriate. Whilst strategic development should be focussed in the larger settlements, it is important to recognise the important role that smaller allocations spread throughout a range of settlements can play in meeting house need.

Large scale strategic development will be important for EHDC to meet their housing needs, however these types of development are usually complex and take time to come forward due to matters such as land assembly, infrastructure delivery and delays to the planning application process. As such, to ensure a robust supply of housing land and to maintain a 5 year housing land supply without an over reliance on the delivery of large strategic allocations, particularly early in the Plan period, smaller sites should also be allocated within the Local Plan.

Sites of the scale of Land at Five Acres, Ropley are important in terms of relatively quick, straightforward

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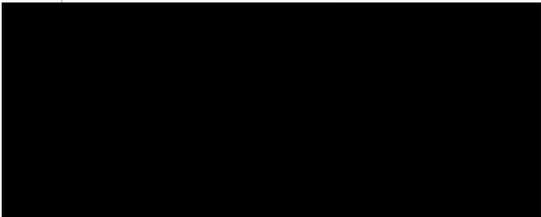
<sup>1</sup> These have previously been shared with Officers, however if further details are required please do not hesitate to contact us.

delivery, and ensure that smaller settlements also continue to grow and thrive to meet specific local housing need, including the provision of affordable homes. This is emphasised within the National Planning Policy Framework (NPPF) which states at Paragraph 69 *"Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built out relatively quickly."* The NPPF also states that *"To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities."*<sup>2</sup>

Looking specifically at Ropley, the Settlement Hierarchy Background Paper (2022) identifies it as a tier 3 settlement. Appendix D scores each of the settlements. Of note is that Ropley scores a 2 in terms of its bus service which includes an hourly<sup>2</sup> bus service to Winchester and Alton. This is in line with the tier 1 settlements and above many of the other tier 3 settlements. This is due to the village being located on the A31 which is a key arterial route through East Hampshire, linking Farnham, Alton and Winchester. The assessment also identifies Ropley to have a convenience store and post office. These facilities make Ropley an appropriate location for the scale of development proposed at Land at Five Acres.

We look forward to continuing to engage with East Hampshire District Council throughout the Local Plan process. If any further information in relation to this site is required then please do not hesitate to contact me at [REDACTED]

Kind Regards



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<sup>2</sup> Bus Route 64 provides a route between Winchester – Alresford – Ropley – Four Marks – Alton at hourly intervals with additional services at peak times.





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

Chapman Lily Planning Ltd  
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Sandford Lane  
Wareham  
BH20 4DY

Date: 3rd January 2023  
Your reference: Local Plan options consultation  
Our reference: [REDACTED]

M: [REDACTED]  
T: [REDACTED]  
E: [REDACTED]  
W: [www.clplanning.co.uk](http://www.clplanning.co.uk)

By email: [localplan@easthants.gov.uk](mailto:localplan@easthants.gov.uk)

Dear Sir or Madam,

### **Better Homes Better Places East Hampshire Local Plan Issues and Priorities Regulation 18 Consultation**

On behalf of Hurlock Investments Ltd, I herein provide a response to the EHDC local plan issues and priorities consultation. Hurlock Investments Ltd is a land owner and development promoter in the Council's administrative area. The following response, therefore, focuses on issues relevant to Hurlock Investments land interests and as a consequence not all issues raised in the consultation are commented upon.

Hurlock Investments Ltd acknowledge that the emerging plan is at the Regulation 18 stage and that the next iteration will be shaped by the feedback from this consultation, as well as the findings of further technical work. However, the emerging plan will ultimately need to satisfy the tests of soundness set out at paragraph 35 of the NPPF:

*'a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs ; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;*

*b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*

*c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and*

*d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant'.*

Given the above requirement, this representation is framed in terms of highlighting areas where the plan may not prove sound and suggests how current deficiencies might be rectified. This response follows the format of the main consultation document and is structured as follows:

- Vision and objectives
- Climate Emergency
- Population and housing
- Types of Housing
- Environment
- Development Strategy
- Promotion of site at Land to Rear of 131, Winchester Road, Four Marks.

**Vision and objectives consultation questions**

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

**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.

**Response:** It is considered that the vision needs to explicitly include reference to ‘growth’. This is important to provide clarity that growth will be integral to achieving the vision, hence it is suggested that the vision could read ‘... where new growth opportunities will provide quality homes, local facilities and employment opportunities and provide our communities with green and welcoming places to live, work and play and respond positively to the climate emergency.’

**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. Whilst the plan has to provide for appropriate new growth it is clear that some areas are better suited to accommodate that growth, which negates the risk of urban sprawl and harm to designated areas. However, it is assumed that the vision can be suitably adjusted to reflect the selected favoured option for growth. The options for growth are considered further in the consultation document, however, on the assumption that the preferred option will seek to focus growth on existing identified suitable settlements, including Four Marks, the vision could be further amended to read ‘... where new growth opportunities will largely be focused on existing sustainable settlements to provide quality homes, local facilities and employment opportunities and provide our communities with green and welcoming places to live, work and play and respond positively to the climate emergency.’

**OV1** Please sort these key issues and priorities in order of importance to you. See below

Issue	Rank
Climate Emergency	4
Environment	2
Population and Housing	1
Types of Housing Needs	3

Infrastructure	5
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Whilst we have ranked the issues and identified population and housing growth as the main issue it is considered that clearly all of the issues are of importance and in terms of effective planning have to be considered holistically. Infrastructure has been ranked 5<sup>th</sup> in so far as the continued use of the Community Infrastructure Levy (CIL) should enable new housing development in particular to contribute to funding infrastructure provision. Thus, all housing including small medium schemes contribute to infrastructure.

### **Climate Emergency consultation questions**

**CLIM1** Do you agree that new development should avoid any net increase in greenhouse gas emissions, wherever practicable? **Yes**, however, there needs to be suitable recognition that such measures can impact upon development viability, design and character. In our opinion this is best defined in national policy and guidance with a local adjustment allowed for to accommodate different viability scenarios.

**CLIM2** So far, you've told us the following - but what's most important to you? (Sort in order of importance). See response to **CLIM3a** and table below -

What You Told Us	Rank
That the construction of new buildings should use less fossil fuels and more recycling of materials	5
That all new buildings should be zero carbon	4
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	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	1
That trees and other green infrastructure could play an important role in reducing flood risks	3

Whilst we have provided a ranking it is difficult to see how the data collected from ranking has any real value in terms of formulating the Local Plan. All issues are important but the ability to address these will depend upon development viability.

**CLIM 3** 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?

Hurlock Investments Ltd would suggest that this is an area of the plan arguably more closely aligned to Building Regulations. A higher energy efficiency target than required under the Building Regulations would

undoubtedly impact upon viability and this could in turn affect the amount of affordable housing development a scheme would be able to support. Hurlock Investments Limited therefore recommends that higher targets including a net zero target should be a matter of choice for the developer, subject to viability. It is however, noted that EDDC already apply a 10% renewable condition to housing applications, generated from policy CP24 which has proved to be workable.

**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? Again, we would reiterate that consideration should be given to the requirements of the Building Regulations in order to avoid conflicting demands.

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

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

**CLIM5a** Please explain your answer.

**Response:** Whilst the Local Plan should clearly frame spatial planning objectives with climate change in mind, the imposition of detailed prescriptive criteria should in our opinion be framed in terms of national planning policy objectives. From a developer perspective a single set of national criteria would be desirable, as opposed to different LPA’s adopting their own requirements. Thus, the same point applies to Neighbourhood Plans and Local Design Codes, as from the developer’s viewpoint providing bespoke climate change solutions at a neighbourhood plan level for example, would be an inappropriate burden. In responding to this question, it is considered that any criteria within the Local Plan should provide for flexible solutions and closely follow national guidance.

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

**CLIM6a** Please explain your response.

**Response:** In principle the ability to live and access services in close proximity to new housing is beneficial. This issue is picked up again in relation to development strategy options and we support the flexible approach adopted by the council as discussed in the response to question DEV2.

**Population and Housing consultation questions**

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

**Response:** 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. This is a well-established method and widely used providing a helpfully consistent of approach between LPA's. Despite recent ministerial statements concerning housing target we understand that the government targets are set to remain the starting point. A recent government press release confirmed that "Housing targets remain an important part of the planning system and the government will consult on how these can better take account of local density."

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

**Response: No**, however, with regard to the duty to cooperate account should be taken for meeting additional need accordingly. Again, we would emphasise that in our view the housing needs figure suggested is sound and unlikely to materially change as a consequence of the ministerial statement referred to 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

**Response:** Meet some of the housing needs of East Hampshire's part of the SDNPA

**POP3a** Please explain your answer.

**Response:** Given the policy requirement that 'great weight' is given to "conserving landscape and scenic beauty in National Parks" the opportunity for new housing development will be restricted accordingly. Settlements such as Four Marks, for example, are well placed near the boundary of the SDNPA and capable of meeting some of the SDNPA need in a sustainable manner. Geographically it would be logical to expect other neighbouring authorities to also accommodate some need.

**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.

**Response:** Offer to assist with some unmet needs, where there may be a direct relationship with the communities of East Hampshire. It should be accepted that a number of the settlements within EHDC are well located to serve adjacent districts. For example, Four Marks is well located to accommodate some potential unmet need from Winchester District. It is also highly likely EHDC will approach its neighbours

under the Duty to Cooperate, and without *accommodating 'unmet need from neighbouring areas... where it is practical to do so'*, the emerging Local Plan will fall foul of paragraph 35a of the NPPF.

### **Types of Housing consultation questions**

**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.

**Response:** Location.

**HOU1a** Please explain your reasons.

**Response:** Whilst it is noted that the projections highlight a growing proportion of people over 65 years in the district, it does not automatically follow that there is a generic older person's home type. It is recognised that there is a need for care homes generally and that it might be logical to seek such a provision as part of a larger allocation. It is also appreciated that smaller homes might be suitable for people looking to downsize and occupy more manageable accommodation. It is important that older people have locational choice to suit their individual needs. It is suggested that the housebuilding industry are well placed to provide products to suit demand and experience has shown that they are capable of providing such accommodation without a policy stick being necessary.

**HOU3** Should the Local Plan include a specific policy on adaptable housing? **No**

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

**HOU4a** Please explain your answer.

**Response:** The need for adaptable housing is obviously not specific to EHDC and therefore ideally requires a national policy/ guidance response. Again, the Building Regulations would appear to be a far more appropriate mechanism to provide such a requirement, and Approved Document M (Access to and Use of Buildings) provides standards for accessible and adaptable dwellings (M4(2)). Therefore, it is suggested that it would be more appropriate for EHDC to utilise the Building Regulations, as opposed to creating a Local Plan policy, which would have to specify quite detailed requirements, and additional planning assessments would place a strain on already limited resources and add a further complexity to obtaining planning permission. However, it should be recognised that adaptable homes add to the space requirements of a building and the cost of building, therefore it is suggested any percentage requirements should be suitably low so as not to impact upon development viability.

**HOU5** Should the Local Plan include a policy to specify the percentage of smaller homes on development sites? **No**

**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).

**Response:** No percentage necessary

**HOU6a** Please explain your answer.

**Response:** It is considered that the housebuilders need flexibility to provide homes which they have a confidence will sell and for which there is a demand. The statistics on the demand for housing sizes is however a helpful guide to inform. It is therefore suggested that a percentage figure for smaller homes should be offered by way of guidance, as opposed to a rigid policy requirement. Thus, when considering the planning balance, the LPA could give weight to proposals which meet the guidance.

**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)

**Response:** Stay the same. However, we would reiterate the need to account for development viability testing and potentially drawing distinction between different parts of the district accounting for potential sales values.

**HOU7a** Please explain your answer.

**Response:** The existing local plan allow for flexibility to consider site specific factors, including market changes, viability and what is right for the community which is a positive approach and should help to maintain a good supply of affordable housing on appropriate sites. The need for affordable housing is appreciated and hence we support the target, subject to adopting the same flexibility as provided by the current policy.

### **Environment consultation questions**

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

Sort in order of importance, from the most important to the least.

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

In our view the environmental considerations should not be traded off and as such it is difficult to see what conclusions can be reached from this question. We would however suggest that there should be focus on integrating nature recovery strategies into emerging planning policy to improve linkages to enhance environment.

### **Infrastructure Consultation Questions**

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

1. Energy supplies and water
2. Internet and mobile phone reception.
3. Schools, colleges
4. Transport
5. Health
6. Community facilities
7. Sport
8. Green spaces

**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? (Select one option)

- A mix of these –

**INF3a** Please explain your answer.

**Response:** In our opinion priorities will differ spatially and to some extent should inevitably focus on areas of growth. Whilst larger sites might be capable of delivering larger elements of infrastructure, these are often provided late in the development process for economic reasons and are often difficult to deliver. Smaller and medium sites often prove more deliverable and can be better located within a community as opposed to the larger urban extension sites. In addition, smaller and medium sites contribute to infrastructure provision via Community Infrastructure Levy payments.

### **Development Strategy Consultation Questions**

**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

**Response:**

1. **Option 1**
2. **Option 2**

**3. Option 3**

**4. Option 4**

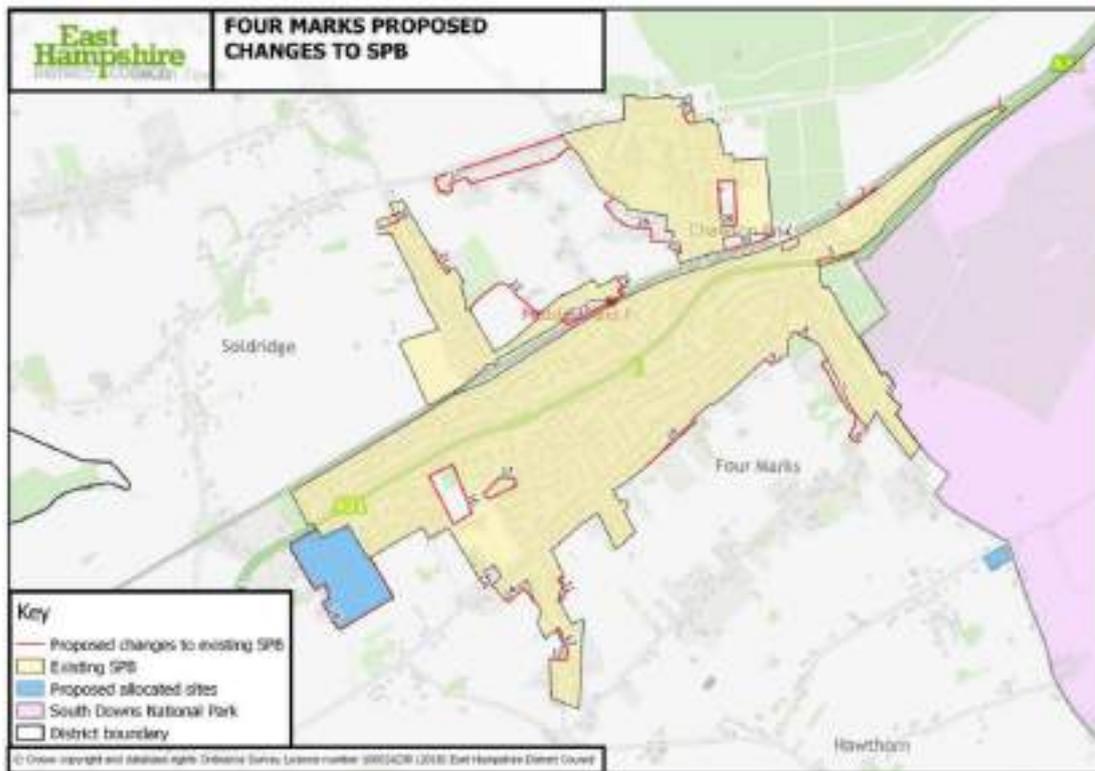
**DEV2** Why have you ranked the options in this way? (Please give reasons for your chosen ranking)

**Response:** Option 1 is ranked first as this would ensure that all suitable settlements are able to accommodate some beneficial growth without the need for large expansions. It is therefore likely that small/ medium size developments can be enveloped within existing built-up areas in a sustainable manner, without needing to encroach upon the surrounding countryside and avoiding the resultant environmental impacts. Suitable growth in a range of settlements should ensure that such settlements can sustain existing community facilities and services, thereby securing an improved community cohesion. Clearly there would still need to be a hierarchical approach with the medium and larger settlements accommodating the most growth.

The Settlement Hierarchy background paper appropriately clarifies the proposed approach to identifying the hierarchical list of settlements. This approach is supported. It is noted that the paper confirms that ‘*an exception to the settlement hierarchy methodology was therefore made regarding Four Marks & South Medstead, taking account of relevant development plan policies.*’ In our view the justification for this is logical and we support this approach.

The Proposed Settlement Hierarchy (2022-based scoring) for the Emerging Local Plan of the Settlement Hierarchy background paper identifies Alton, Liphook, Whitehill & Bordon, Clanfield, Four Marks South Medstead, Grayshott, Horndean within the top two tier classifications. In our view this conclusion is sound and well justified. Consequently, we would anticipate that the majority of the new housing would be focused on these settlements, however, option 1 would also allow small levels of growth in the lower tiers in order to help sustain communities.

However, we do not agree that option 1 would necessarily impact on the character of rural landscapes within the planning area. In our opinion, there are a number of suitable sites enveloped by development which can be allocated. This is evidenced by EHDC’s Settlement Policy Boundary Review: Interim Methodology Paper for the East Hampshire District Local Plan Regulation 18 consultation’ published in December 2018. This was a comprehensive review and considered all settlements and numerous potential sites. For example, the settlement of Four Marks was considered, and some 30 sites assessed recommending revisions to the development boundary. Please see figure 1 below for an extract of the plan concerning the proposed changes to SPB for Four Marks by way of example.



**Figure 1: Extract from Settlement Policy Boundary Review: Interim Methodology Paper for the East Hampshire District Local Plan Regulation 18 consultation.**

Whilst the consultation document suggests that option 1 might challenge the provision of affordable housing needs in the largest communities, however, in our opinion it should provide more dispersed affordable housing provision which is better located to serve the wider population and provide more locational choice. In addition, the use of a hierarchical settlement approach will no doubt ensure that large/ medium sized settlements will accommodate the most growth and consequently continue to provide affordable housing opportunities.

Option 2 has some advantages as the consultation document indicates, but a focus on medium and large settlements alone would require the expansion of urban areas beyond their existing geographical limits, which would impact upon the landscape setting of these settlements and would be likely to encroach into the surrounding countryside and agricultural land.

Option 3 appears to have some limited merit, but it is difficult to fully assess the likely implications of such an approach. The general areas indicated on the consultation document plan lacks detail and the approach implies that development would be located beyond settlements with the consequential potential negative impacts. The option would also be potentially flawed if the LPA accept that there is a need to accommodate neighbouring authorities' growth. Option 3 would also appear to limit the opportunity to accommodate growth from neighbouring authorities.

Option 4 concerns a new settlement which is considered to be unlikely to be deliverable in a timely and sustainable manner. The consultation documents correctly indicates that this could result in building homes which aren't in areas with the lowest risk of flooding; failing to meet the development needs of existing communities; and failing to support the growth and prosperity of south Hampshire. In our opinion this represents a high-risk option and would be an unsuitable strategy to adopt.

DEV3 Are there any alternative options we should consider?

**Response:** No, however, the response above indicate that the favoured options will require refinement to be effective. We would commend the use of 'EHDC's Settlement Policy Boundary Review: Interim Methodology Paper for the East Hampshire District Local Plan Regulation 18 consultation' published in December 2018, in order to help guide the development strategy. It is considered that this is a robust piece of evidence and should simply be taken forward.

### **Additional Comments - Promotion of site at Land to Rear of 131, Winchester Road, Four Marks**

Whilst it is appreciated that the Regulation 18 Consultation is not a call for sites, Hurlock Investments Ltd wish to ensure the LPA are fully aware and take account of the fact that that the above site is being promoted for housing development. We consider that the site has scope for providing circa 25 quality homes and illustrates how existing settlements like Four Marks have capacity to accommodate housing growth in a suitably contained and sustainable manner, without resulting in urban sprawl. In our view this site is a good example of how appropriate development might be accommodated in a manner which addresses many of the issues and preferred options (raised by the Regulation 18 consultation) as discussed above.

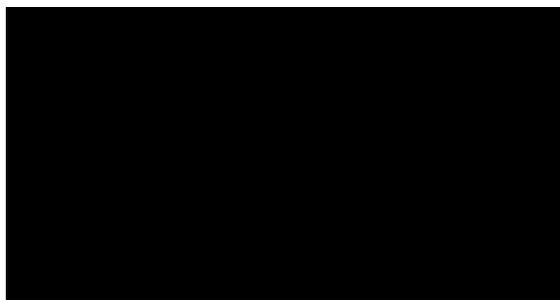
For the avoidance of doubt the proposed development of the site at the rear of 131 Winchester Road, Four Marks is considered to be genuinely deliverable and will positively contribute to the districts housing needs, including providing an element of much needed affordable housing. Please see Appendix 1 attached to this letter which provides more details concerning the site and its deliverability.

### **CONCLUSIONS**

Hurlock Investments Limited appreciate the opportunity to respond to this consultation, which is a well-structured document and easy to follow.

I trust that the above points will be aptly considered in the lead up to the pre-submission version of the emerging plan and will ultimately help to deliver a sound plan that meets future needs in a sustainable manner. Hurlock Investments Ltd is committed to constructive and on-going discussions with the Council regarding emerging policy. We will seek to progress development proposals for the land at the rear of 131 Winchester Road, Four Marks in a timely manner, including a pre-application stage and we look forward to a positive dialogue.

Yours faithfully,



#### **Appendices**

1. Site at Rear of 131 Winchester Road, Four Marks

## Appendix 1 – Site at rear of 131 Winchester Road, Four Marks

### Introduction

The following sets out an overview of the emerging proposed development proposal for the site to the rear of 131 Four Marks, which is land owned by Hurlock Investments Limited. The details are offered in support of the Regulation 18 consultation response but also to ensure that the LPA are aware of and account for this deliverable site when assessing potential development opportunities.

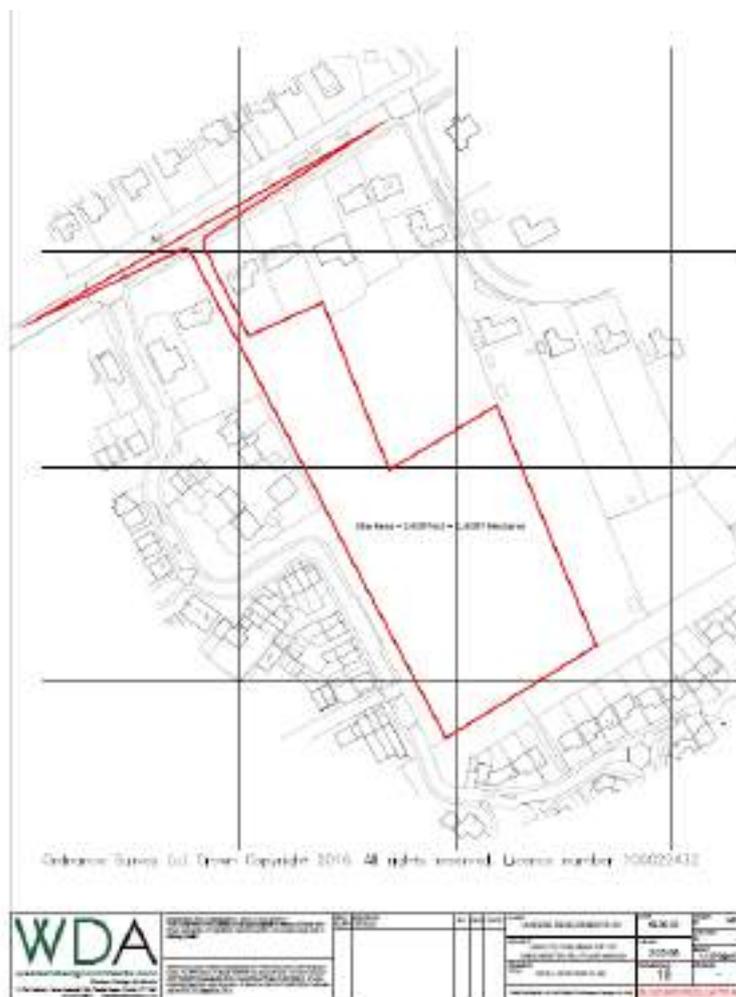


Figure 1: Site Location Plan extract (courtesy of Western Design Architects)

### Site Description

The existing site is an open field that is largely surrounded by a hedgerow and vegetation, which is bounded by other housing and a small woodland in the north east corner of the site. The





**Figure 3: Site and surrounding development**

### **Sustainability**

The site is located in a sustainable location, and clearly positioned within the geographical coverage of Four Marks. The settlement of Four Marks is identified in the existing local plan as being suitable to accommodate residential development in principle.

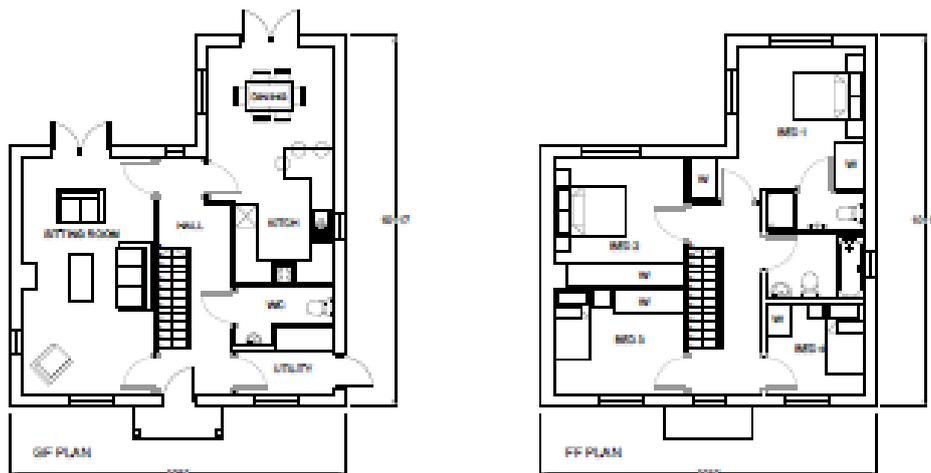
The Settlement Hierarchy Background paper published by the LPA as part of the Regulation 18 consultation, confirms that in terms of employment *'the results of the qualitative assessment show that there are several well-occupied clusters, or concentrations of employment sites, within the settlements of Alton, Whitehill & Bordon, Four Marks, Liphook and Horndean. These clusters generally have good access to, or are otherwise close to the main strategic transport routes of the A3 and the A31.'*

In terms of access to key services and facilities, the settlement hierarchy ranking placed Four Marks & South Medstead as 5<sup>th</sup> (as illustrated in table 2 of the Settlement Hierarchy Background paper). Whilst Table 3 (Proposed Settlement Hierarchy (2022-based scoring) for the Emerging Local Plan) ranks Four Marks & South Medstead as Tier 2 in the hierarchy, confirming the sustainable nature of the settlement.

## The Emerging Proposal

Figure 2 above illustrates a preliminary draft layout (which will be refined) and illustrates how a mix of 25 dwellings might be provided on the site. It will be noted that care has been taken to maintain the hedgerows and woodland area as part of the layout.

Given that the site is entirely surrounded by residential development, the principle of residential development on the site is clearly compatible with the character of the locality. The intention is that the dwellings will be of a range of designs and types, including a policy compliant number of affordable housing units. The designs will be compatible with the character of the area. Figure 3 below provides a floor plan extract of one of the emerging house types.



**Figure 3: Example of house type floor plan (Courtesy of Western Design Architects)**

Access to the site would be from Winchester Road as illustrated in Figure 2.

The site is identified in the East Hampshire Housing Land Availability Assessment as having the potential to accommodate a residential development of up to 53 dwellings, however, accounting for the constraints of the site it is considered that circa 25 dwellings is more realistic, and this lower number should better respect the character of the locality. The principle of residential development on the site utilising an access from Winchester Road from a highways and transportation viewpoint has previously been agreed by Hampshire County Council (HCC), when considering an earlier proposal. Hence, the emerging Transport Statement for the proposed development does not identify any insurmountable highway constraints.

## **Ownership**

The site is owned by Hurlock Investment Limited and as such there is no land ownership impediments which would restrict the development from coming forward.

## **Deliverability**

The planning and design process is now at an advanced stage, illustrating an intent by Hurlock Investment Limited to secure planning permission. It is anticipated that a formal application will be progressed during 2023, following a pre-application submission. Specialist consultants have been engaged which includes highways design and ecology. A phase 1 Ecological study has been completed and phase 2 assessments are scheduled for 2023 in order to confirm any necessary mitigation. However, the draft site layout has been designed to account for the phase 1 assessment findings. Thus, we are confident that subject to suitable protection and mitigation measures there are no insurmountable ecology constraints which could prevent delivery.

The National Planning Policy Framework glossary confirms that *'to be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years.'*

Hurlock Investments Limited consider that the site to the rear of 131 Winchester Road is deliverable. It is owned by Hurlock Investments Limited therefore there are no obvious land ownership impediments; the indications are that constraints such as ecology and highways can be suitably resolved. Furthermore, the site has been identified in the Council's Land Availability Assessment 2022 (site reference LAA/FM-016) as being available, achievable, and developable within 5 years. Hurlock Investments Limited programme for the site includes bringing forward a detailed planning application during 2023, indicating that the site should be deliverable well within the 5 year period.



## **East Hampshire District Council – Land East of Lindford Chase**

### **Representations to Issues and Priorities (Regulation 18 Part 1) Consultation**

#### **1. Introduction**

- 1.1. On behalf of European Property Ventures (Hampshire) Ltd, Claremont Planning Consultancy has been instructed to prepare and submit representations to the Issues and Priorities (Regulation 18 Part 1) consultation being undertaken by East Hampshire District Council to inform the emerging Local Plan.

#### **2. Vision**

**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.**

- 2.1. Claremont Planning, on behalf of European Property Ventures (Hampshire) Ltd, consider that the proposed vision is overly ambiguous in its current form and would therefore benefit from further refinement to ensure clarity in its application. The vision as proposed is not considered to be in accordance with Paragraph 16 of the National Planning Policy Framework (the Framework) which requires Local Plans to be positively prepared in a way which is aspirational but deliverable. The Council maintain that the purpose of the vision is to articulate how the Local Plan will direct and influence new development across the District, however the vision fails to identify this, stating only that ‘residents will live in healthy, accessible, and inclusive communities’ with no identification of how the Council proposes this to be achieved. As such, it is advised that the vision is amended to specify how the emerging Local Plan will secure a sustainable distribution of development through the allocation of sufficient number and range of sites to deliver an adequate number, and appropriate mix, of housing to meet the development requirements of the District.

#### **3. Issues and Priorities**

**OV1: Please sort these key issues and priorities in order of importance to you; climate emergency environment; population and housing; types of housing needs; and infrastructure.**

- 3.1. In order for the new Local Plan to be found sound at Examination, it is imperative that the emerging Local Plan is positively prepared and provides a strategy which, as a minimum, seeks to meet the District’s objectively assessed housing needs, in accordance with Paragraph 35 of the Framework. As such, Claremont Planning on behalf of European Property Ventures (Hampshire) Ltd, would identify ‘Population and Housing’ as of primary importance. It is also critical to ensure that both a sufficient number, and appropriate mix of housing should be planned for to ensure that the needs of groups with specific housing requirements are robustly addressed, as promoted through Paragraph 60 of the Framework. In particular, the Council is urged to adopt a positive approach to the provision of housing to meet the needs for older people, and specifically allocate sites through the Local Plan rather than relying upon the delivery of this type of accommodation on windfall



sites within wider housing developments. With respect to the Council's environmental objectives, it should be recognised that care-related developments are typically low impact in nature and therefore can be considered in more sensitive locations. European Property Ventures (Hampshire) Ltd are in control of the Land East of Lindford Chase, which is considered to comprise a suitable, available, and deliverable site to assist in addressing the need for older persons accommodation. The suitability of the Land east of Linford Chase for a care-related development has previously been recognised by the Council through the 2018 Land Availability Assessment due to the very limited recreational pressure on the Wealden Heaths Phase II SPA to be created through this type of accommodation.

- 3.2. The climate emergency and the environment are generally supported as key issues to be addressed through the emerging Local Plan, in accordance with the provisions of Paragraph 8 of the NPPF which promotes mitigation and adaptation to climate change alongside transitioning to a low carbon economy. However, it is critical that this aspiration is carefully balanced against the need to deliver housing and other uses to ensure that any requirements for on-site mitigation do not unduly constrain the capacity of sites or result in additional costs which may compromise the viability of a development. As such, it should be recognised that allocating sites for development which are sustainably located with local services and facilities accessible via sustainable modes of transport represents an effective means of responding to the issues of climate change and the environment.
- 3.3. In terms of the key issues and priorities it is considered that they should be ranked in the following order of importance:
  1. Population and housing
  2. Types of housing needs
  3. Climate emergency
  4. Environment
  5. Infrastructure
- 3.4. It is considered however, that it is not necessarily the correct approach to disaggregate the issues and priorities identified as this does not represent a sound basis for the Local Plan's preparation. Paragraph 16 of the Framework establishes that Local Plans should be prepared with the objective of contributing to the achievement of sustainable development, whilst Paragraph 8 of the Framework advises that the social, economic, and environmental objectives are interdependent and therefore must be pursued in mutually supportive ways. Disaggregating the issues and priorities identified fails to adequately recognise the interrelated nature of these priorities and will not therefore result in an appropriate policy response to fully address these matters.



#### 4. The Climate Emergency

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

- 4.1. As identified, the Council's aspiration to respond to the climate emergency through the emerging Local Plan is supported, in accordance with Paragraph 8 of the Framework which promotes mitigation and adapting to climate change. The Climate Change Topic Paper prepared by the Council in support of this consultation identifies that a requirement for net-zero carbon development could aim to avoid additional carbon dioxide emissions arising from operational energy use within new buildings alongside a reduction in emissions from non-operational sources. This approach is not supported, where the Climate Change Topic Paper identifies that this requirement goes further than the Future Homes Standard and Future Building Standard. The Future Homes Standard is a revision to Building Regulations Part L which has been carefully considered by the Government to deliver reductions in carbon dioxide emissions which are crucially both realistic and deliverable whilst the transitional arrangements for this Standard which are already in place have been carefully considered by the Government so that new dwellings conform to the standards 'as soon as reasonably possible'. As such, it is not considered pragmatic or reasonable for the Council to explore measures to expedite the implementation of these standards or increase the level of mitigation required beyond that set out within the standards.

##### **CLIM2: So far you have told us the following – but what's most important to you?**

- **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 in 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.**
- 4.2. Claremont Planning on behalf of European Property Ventures (Hampshire) Ltd have a number of reservations regarding the measures identified by the Council through previous consultations on the emerging Local Plan. The suggestions that all new buildings should be zero carbon and that every new development should have renewable energy provision are not supported. Whilst these measures are aspirational in their approach, it is not considered that identifying these as a policy requirement for all new development is appropriate and fails to recognise the implications of requiring these measures on the viability and deliverability of new developments. Indeed, through the Issues and Priorities consultation document the Council recognise that 'it will be very challenging to build zero-carbon homes



during the local plan period' particularly in the absence of national policy and guidance as to how this should be achieved. The construction of all new dwellings and buildings to net-zero carbon is therefore not considered to be a realistic or deliverable policy aspiration. Likewise, a requirement for all new development to have renewable energy provision is not supported, where such a requirement will likely engender considerable additional costs to delivering development which may prove unviable.

- 4.3. Aspirations for new developments to utilise fewer fossil fuels in the construction phase; reduction in water consumption in the operation of new developments; and recognition of the role of trees and other green infrastructure in reducing flood risk are generally supported in accordance with Paragraph 153 of the Framework which expects Local Plans to take a positive approach to mitigating and adapting to climate change. However, it is advised that the Council do not seek to implement a prescriptive policy approach in this respect, but rather identify the above as aspirations which should be implemented where appropriate to ensure that the capacity and viability of developments is not compromised.

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

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

- 4.4. The 'best-practice definition' as currently proposed is not supported. The definition identifies that all energy consumed by a development would require consideration, not only that which is regulated by the Government's Building Regulations. This requirement is not complaint with national policy, specifically Paragraph 154 of the Framework which asserts that any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards. As such, it is advised that the proposed best-practice definition should be reviewed to ensure that it is complaint with national policy, guidance, and technical standards.

**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?**

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

- 4.5. Paragraph 16 of the Framework establishes that local planning policy should serve a clear purpose and avoid the duplication of policies that apply to a particular area. As such, it is not considered necessary for the Council to introduce additional design policies through the emerging Local Plan which concentrate upon addressing climate change through the design of buildings in accordance with the energy hierarchy. Detailed design guidance in this respect has already been adopted by the Council through the April 2022 Climate Change and Sustainable Construction Supplementary Planning Document and does not need to be duplicated. In accordance with national guidance, it is therefore not appropriate for the Council to duplicate this guidance through policies contained in the emerging Local Plan.



**CLIM5: Should the detailed criteria for tackling climate change be specified within any of the following; the emerging East Hampshire Local Plan; in future neighbourhood plans; or in local design codes.**

- 4.6. The Climate Change Topic Paper identifies the Council's aspiration to deliver resilient environments, through the incorporation of SuDS where appropriate; provision of tree planting and green infrastructure; inclusion of water saving measures in new buildings; and considered building design with regard to the location and design of windows. The Topic Paper suggests that detailed criteria for climate change mitigation and adaptation could be left to new non-strategic policies of the Local Plan. Should the Council proceed with the inclusion of a new, non-strategic policy to this effect, it is recommended that this policy identify the delivery of these measures as an aspiration rather than establishing detailed criteria for their delivery. As recognised within the Climate Change Topic Paper, determining where these measures are appropriate for use will require a consideration of the local context of a site and the constraints to and opportunities presented by the site. Requiring all development sites to comply with detailed criteria for the delivery of these measures, regardless of whether these are justified based upon an assessment of the site, may fail to secure the delivery of truly effective mitigation against climate change and may unnecessarily constrain the capacity and viability of development sites.

**CLIM6: How do you feel about using the idea of living locally to influence the location of new homes? CLIM6a: Please explain your response.**

- 4.7. The principle of directing development to sustainable locations which are characterised by the presence of local services and facilities accessible by sustainable transport means is supported in principle where it is consistent with the social objective identified by Paragraph 8 of the Framework. However, the Council's methodology for pursuing this through the concept of living locally and the 20-minute neighbourhood principle is not considered appropriate. The Council's application of the 20-minute neighbourhood model presented within the Settlement Hierarchy Topic Paper is considered to be flawed where the accessibility of services and facilities, has been assessed only in relation to walking and cycling times/distances. The methodology fails to consider the availability of public transport services within a settlement and how this may improve accessibility to the services and facilities available. The use of a 20-minute neighbourhood model to prepare the updated Settlement Hierarchy is considered fundamentally inappropriate where the District is largely rural in nature being characterised by small, low-density settlements. Although the Council recognise within the Topic Paper that residents within the District will have a continuing need to travel to larger service settlements; recognition of the proximity and connections between smaller and larger service settlements and availability of public transport services is not provided for through the Council's 20-minute neighbourhood and 'local living' model.



## 5. Population and Housing

**POP1: How do you think we should proceed: Use the standard method for calculating housing need as the basis for determining requirements against which the five year housing land supply and Housing Delivery Test are measured; or further explore whether exceptional circumstances exist to be able to devise a revised local housing requirement.**

**POP1a: Please explain your answer.**

- 5.1. The Housing Needs and Requirement Topic Paper identifies a housing requirement for the period 2021-2040 of 9,823 dwellings, equivalent to 517 dwellings per annum, based upon the Standard Method. In order for the emerging Local Plan to be found 'sound' at Examination, Paragraph 35 of the Framework requires that the Plan must identify sufficient sites to meet the area's objectively assessed housing need as a minimum.
- 5.2. The Standard Method housing requirement is recognised as a sound basis to identify housing need, however it should be appreciated that Government guidance is clear that the Standard Method provides a minimum number of homes to be planned for in a way which addresses projected household growth and historic undersupply (Planning Practice Guidance (PPG) Paragraph 002 Reference ID: 2a-002-20190220). Paragraph 003 of the PPG advises that whilst use of the Standard Method is not mandatory, there is an expectation that the Standard Method will be used and that any other method should be used only in exceptional circumstances and will be closely scrutinised at Examination.
- 5.3. Circumstances in which it may be appropriate to devise a revised local housing requirement relate to situations where increases in housing need are likely to exceed past trends because of growth strategies for the area which are likely to be deliverable; strategic infrastructure improvements; and an authority agreeing to take on unmet need for neighbouring authorities as identified within Paragraph 010 of the PPG. The Housing Needs and Requirement Topic Paper prepared by the Council confirms that there is no additional funding in place to facilitate additional growth and that there are no strategic infrastructure schemes directly influencing the District. With respect to unmet need from neighbouring authorities, the Topic Paper establishes that the majority of housing need through to 2036 for the South Hampshire Authorities (East Hampshire, Portsmouth City Council, Eastleigh Borough Council and Southampton City Council) is already planned to be met through existing planning permissions and Local Plan allocations, with any unmet need arising to be addressed through the preparation of a new Joint Strategy. The Topic Paper also identifies that the Council has been approached by Havant Borough Council and Chichester District Council regarding unmet need but that Duty-to-Cooperate discussions have been progressed through the Council's Sustainability Appraisal process. In light of the early stages of discussions with neighbouring authorities regarding unmet housing need, it is not considered that, at this stage of Plan preparation, there are the exceptional circumstances present to justify deviating from the Standard Method housing requirement.



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

- 5.4. As identified, it is imperative that the emerging Local Plan seeks to deliver the area's objectively assessed housing needs as a minimum. This local housing need figure does not therefore represent a maximum level of development to be planned for, and it is maintained that the Council should seek to deliver housing in excess of this requirement to ensure a robust supply of housing throughout the Plan period.
- 5.5. Although the Standard Method includes an affordability uplift, the Council recognises within the Issues and Priorities consultation document that affordability within the District is a key issue to be addressed through the Plan. In accordance with Paragraph 35 of the Framework, it is recommended that the Council positively plan for the provision of housing in excess of the Standard Method requirement, in recognition that the delivery of an increased quantum of housing will assist in improving the affordability of market housing within the District. In addition, the Housing Needs and Requirement Topic Paper identifies a need for 613 affordable homes per annum. Planning to deliver a greater quantum of housing will also assist in securing the delivery of affordable housing to contribute towards meeting this identified need.
- 5.6. Paragraph 61 of the Framework also establishes the imperative to consider any needs that cannot be met within neighbouring areas when establishing the amount of housing to be planned for. This is pertinent given that part of East Hampshire falls within the South Downs National Park. There is therefore a strong geographical and functional link between East Hampshire and the South Downs National Park Authority. National Parks benefit from a significant level of protection through national policy, and the Housing Requirement and Needs Topic Paper has identified the expectation that the South Downs National Park Authority will not necessarily plan to meet the full objectively assessed need of the area, instead focusing upon housing delivery to meet affordable need and supporting the local economy. The extent of the housing shortfall within the South Downs National Park is likely to be considerable, based upon existing levels of growth planned for through the South Downs Local Plan (2019) which results in a shortfall of 197 dwellings per annum. By virtue of the close relationship between these two authorities, and environmental constraints to development within the South Downs National Park, it is critical that the emerging East Hampshire Local Plan has regard to any unmet need from South Downs arising through the review of the South Downs National Park Local Plan which commenced in May 2022. Ensuring that any unmet need arising from the National Park will further ensure that the Plan is based on effective joint working on cross-boundary strategic matters.
- 5.7. Through Policy CP2 of the Joint Core Strategy, a housing requirement of 10,060 dwellings for the period through to 2028 was established. On behalf of European Property Ventures (Hampshire) Ltd, Claremont Planning would challenge why the emerging Local Plan review proposes to plan for a reduced level of housing provision of 9,823 dwellings for the period 2021-2040. In light of the challenges to affordability within the District, and the likely prospect of unmet need arising from the South Downs National Park; it is not considered



that planning for a reduced level of housing provision represents a sound basis for the Plan's preparation.

**POP3: Based on the above should we meet:**

- **All of 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 SDNPA**

**POP3a: Please explain your answer.**

- 5.8. It is strongly advised that the emerging Local Plan seeks to meet all of the housing needs of East Hampshire's part of the South Downs National Park where this is considered to represent a sustainable approach to the distribution of growth given the environmental constraints presented to development within the South Downs National Park. In addition, given the rural nature of South Downs National Park, it is considered that directing development to the larger sustainable settlements located within East Hampshire is preferable to ensure that new development is sustainably located, particularly with respect to the delivery of affordable housing. It is maintained that the emerging Local Plan should therefore seek to address both the housing needs of East Hampshire's part of the SDNPA alongside any unmet need identified through the review of the South Downs National Park Local Plan.

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

- **Offer to assist with unmet need, 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.**

- 5.9. Local Planning Authorities are bound by a duty to cooperate with effective and on-going joint working critical to ensure that a positively prepared and justified strategy is produced, in accordance with Paragraph 26 of the Framework. In light of this requirement, failing to consider requests for assistance with accommodating unmet need arising from neighbouring authorities is not considered to be an effective strategy which is compliant with the tests for soundness set out at Paragraph 35 of the Framework. As such, a failure to address any unmet housing need arising from adjacent authorities will not result in a new Local Plan which will be found 'sound' at Examination.

- 5.10. It is not advised that the Council proceed to assist with all unmet needs, regardless of scale and location. Instead, it is recommended that the Council offer to assist with some unmet needs, where there may be a direct relationship with the communities of East Hampshire. Proceeding with this approach is compliant with Paragraph 35 of the Framework which expects unmet need from neighbouring authorities to be accommodated where it is practical to do so and where this is consistent with achieving sustainable development.



- 5.11. It is considered imperative that a coordinated approach to housing delivery is adopted by East Hampshire and adjacent authorities given the environmental constraints to development within this region. Notably, East Hampshire comprises one of twelve local authorities located within the 'Planning for South Hampshire' (PfSH) area which is a partnership for strategic planning issues within the region. The environmental constraints to development within the region are considerable, and include matters of nutrient neutrality for which a coordinated approach to mitigation will be required. Additionally, there are various internationally protected sites located within the region, including the Wealden Heaths Phase II SPA, the Solent and Dorset Coast SPA, numerous Special Areas of Conservation, alongside the presence of the South Downs and New Forest National Parks. In light of the cross-boundary nature of these environmental constraints, it is crucial that the new Local Plan considers the implications of these constraints on housing delivery and mitigation and that these issues are addressed at the regional scale, through assisting with unmet housing need arising from adjacent authorities where appropriate and justified.

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

- **A specific target in terms of number 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**

- 5.12. On behalf of European Property Ventures (Hampshire) Ltd, Claremont Planning strongly support the Council's recognition of the existing age structure of the District which is older than other areas both regionally and nationally. The Council's updated 2022 Housing and Economic Development Needs Assessment (HEDNA) identifies that East Hampshire is projected to see a notable increase in the population aged 65 and over, with population growth of people aged 65 and over accounting for 67% of the total projected population change through to 2038. In accordance with Paragraph 62 of the Framework, the Council's aspiration to ensure that the housing needs of older people are effectively addressed through the emerging Local Plan is strongly supported.
- 5.13. The 2022 HEDNA identifies that by 2038 there is an estimated need for 1,597 additional dwellings with support or care across East Hampshire, with a need for 331 additional nursing and residential care bedspaces identified. In total, the analysis presented within the 2022 HEDNA identifies a need for approximately 1,781 units over the period 2021-2038, equating to some 17% of all homes needing to be some form of specialist accommodation for older people. In light of this identified need for housing for older persons, it is advised that any policy relating to older persons accommodation should clearly identify the level of provision required based upon a robust and fully evidenced assessment of need.
- 5.14. In recognition of the acute need for accommodation to meet the needs of older persons, both on a district and national level; the Council are advised that any policy on older persons accommodation should identify the specific types of homes required to meet this need. The



House of Lords 'Meeting Housing Demand' report to the Built Environment Committee published in January 2022 establishes the imperative to secure the delivery of an improved mix of more suitable, accessible 'mainstream' housing and specialist housing for the elderly if the housing market is to remain sustainable in light of demographic changes, whilst also identifying that the housing choices for older persons are constrained by the options available at present. It is evident that effectively addressing the housing needs of older persons is not solely restricted to increasing the number of units provided, but also ensuring that the difference in need between different types and tenures of older persons accommodation is identified and addressed through policy.

- 5.15. Paragraph 16 of the Framework requires Local Plans to be positively prepared, in a way which is both aspirational but deliverable. Identifying a specific target in terms of numbers of homes for older persons to be delivered, alongside identification of the specific types of accommodation to be provided is considered to be an aspirational approach to addressing housing needs for older persons; but is not considered to be sufficient to ensure the deliverability of these aspirations. To ensure that any subsequent policy secures the delivery of accommodation for older persons; it is strongly advised that site-specific allocations for older persons accommodation are identified through the emerging Local Plan. It is increasingly recognised that extra care and similar models of older persons accommodation do not perform in the same way as general market housing with substantially greater build-out costs which are often front-end loaded and with income generated over a longer term. As such, providers of older persons accommodation cannot compete for land with general housing market providers, presenting a significant challenge to the delivery of this type of accommodation. Through allocating specific sites to meet the need of older persons accommodation, the constraints to the delivery of this type of accommodation can be addressed and greater assurance provided that the quantum and type of accommodation required can effectively be delivered.
- 5.16. The Land East of Lindford Chase is under the control of European Property Ventures (Hampshire) Ltd and comprises a suitable, available, and deliverable site for the provision of older persons accommodation in the form of a C2 Care Home. The promoted site is located to the north of Lindford, is sited directly adjacent to the settlement boundary. The site lies directly north of the established residential area, with mature woodland to the north east and west enclosing the site so that it is well-bound by mature vegetation and woodland. The relationship of the site to the existing built form demonstrates the suitability and sustainability of the site for a C2 care related development. The site's partial location within the 400m buffer to the Wealden Heaths II Special Protection Area (SPA) is recognised through these representations but is not considered to represent an overall constraint to the site's development. Indeed, this has previously been recognised by the Council through the 2018 Land Availability Assessment which, in relation to the promoted site, identified that C2 Care Homes can be suitable within 400m of the SPA, depending on the mobility of residents in terms of likely accessing the SPA. It is also envisaged that occupants of any future Care Home development at Lindford Chase would be local residents, and therefore would also assist in addressing issues relating to the underoccupancy of dwellings by older persons by encouraging downsizing and freeing up the supply of existing family-sized accommodation



at the settlement. As such, it is maintained that the Land East of Lindford Chase comprises a suitable and sustainable site for allocation for use as a C2 Care Home to assist in meeting the District's need for older persons accommodation.

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

**HOU5: If yes, should this percentage focus on:**

- **1-2 bed homes**
- **2-3 bed homes**

5.17. Although the imperative to ensure the size, type, and tenure of housing needed for different groups to be assessed and reflected through planning policies is established by Paragraph 62 of the Framework; establishing a policy requirement to specify the percentage of smaller homes on a development site is not considered to be justified or appropriate. The Council's 2022 HEDNA presents a recommended housing mix for market housing, which promotes the delivery of predominantly two and three bedroom dwellings, with one-bedroom and four-bedroom units each to comprise approximately 15% of supply. The suggestion within the consultation document that the Council should establish strict requirements for the delivery of smaller units is therefore not in accordance with the emerging evidence base for the Plan which instead indicates a greater need for family-sized accommodation. Moreover, the 2022 HEDNA establishes that prescriptive figures are not advised to be used within the plan making process, and instead recommends that the suggested housing mix identified within the HEDNA is used as a monitoring tool to ensure that future delivery is not unbalanced. The inclusion of specific percentage requirements for the delivery of small units of accommodation is therefore not considered to be an appropriate strategy, based upon proportionate evidence as required by Paragraph 35 of the Framework.

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

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

**HOU6a: Please explain your answer**

5.18. As established above, proposed percentage requirements for the provision of smaller homes on development sites are not supported. Instead, a more appropriate policy approach could be to require development proposals to seek to deliver a range of dwellings to meet local needs, demonstrating regard to the HEDNA and other local housing market trends. Such an approach would be in accordance with the recommendations of the 2022 HEDNA which recognises that demand can change over time linked to macro-economic factors and local supply.

5.19. In addition, establishing percentage requirements for any housing mix to be achieved on development sites fails to recognise that site location and local character considerations are also relevant when determining an appropriate housing mix. For example, greenfield sites are typically more appropriate for the delivery of larger units of accommodation and



affordable housing, whilst brownfield sites within the established urban area are better suited for the delivery of flatted accommodation.

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

- **Increased**
- **Decreased**
- **Stay the same**

**HOU7a: Please explain your answer**

- 5.20. It is considered that the current affordable housing requirement of 40% of new homes on qualifying sites is substantial however, that this level of requirement is justified by virtue of the acute need for affordable housing throughout the District. Any uplift to this requirement would be considered excessive and could likely constrain the viability, and deliverability of developments.

## **6. Environment**

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

- **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**

- 6.1. The Council's aspirations with respect to protecting the most vulnerable existing protected habitats and species is supported where this is consistent with Paragraph 175 of the Framework.

- 6.2. Whilst achieving improvements to local wildlife habitats and establishing better links between existing habitats are supported in principle, it is considered that these aspirations will largely be secured through emerging requirements for development to deliver at least 10% Biodiversity Net Gain under the Environment Act 2021. On behalf of European Property Ventures (Hampshire) Ltd, it is advised that any Biodiversity Net Gain policy progressed by the Council should be set at 10% and no higher than this. The Government consider that achieving a 10% net gain in biodiversity is achievable with an impact assessment undertaken by DEFRA confirming that this level of requirement is unlikely to significantly affect viability issues for developments. A 10% net gain requirement is therefore considered appropriate and based upon robust evidence. Any increase in biodiversity net gain requirements proposed by the Council through the emerging Local Plan would therefore be strongly resisted due to the likely implications of an increased requirement on site capacity and the viability of development.

- 6.3. The aspiration to conserve the character of rural landscapes is not supported in its current form. It is advised that this is reframed to recognise the intrinsic character and natural beauty



of the countryside as required through Paragraph 174 of the Framework. It is however critical to ensure that aspirations to conserve rural character do not constrain the delivery of a sufficient number and range of homes in order to meet the District's development requirements. In recognition of the intrinsic character beauty of the countryside, it is recommended that development is directed to locations which relate strongly to established settlement form. European Property Ventures (Hampshire) Ltd's Land East of Lindford Chase is considered an appropriate location for further development in this respect, where the site is located adjacent to the settlement boundary and established residential development. In addition, the northern extent of the site is defined by substantial mature vegetation which would provide a new defensible settlement edge.

**CFS2: Please describe where the land is and provide an address if possible**

- 6.4. The 'Environment' section of the consultation document concentrates upon the presence of several sites which are of internal importance for biodiversity, including the Wealdon Heaths Phase II Special Protection Area. To avoid or mitigate any impacts from an increase in recreational activities from new development, Suitable Alternative Natural Greenspace (SANG) is identified as one suitable form of mitigation. The eastern extent of land east of Lindford Chase is located within the 400m buffer for the Wealdon Heaths Special Protection Area whilst the remaining site area is located within the 5km buffer to the SPA and is considered a suitable location for the delivery of additional SANG. A site location plan identifying the extent of the promoted Land East of Lindford Chase is enclosed with these representations.
- 6.5. As identified, included within the Issues and Options Consultation is a 'call for green sites' to assist the Council in identifying land which could be suitable for SANG, as well as Biodiversity Net Gain sites, and sites for suitable nutrient neutrality mitigation measures. The imperative for the Council to identify suitable sites for SANG and other environmental purposes is evident within the Habitats Regulation Assessment (HRA) which accompanies this consultation. The HRA identifies that all spatial options presented by the Plan would involve the delivery of housing within 5km of the Wealdon Heaths SPA, with likely significant effects of the Regulation 18 Plan unable to be excluded for any of the growth options considered at this stage. The HRA's identification that all of the spatial options presented will likely result in development within the 5km buffer of the SPA, means it is evident that additional SANG will need to be identified through the emerging Local Plan in order to mitigate against any resultant recreational pressure to the SPA.
- 6.6. In light of the Council's recognition that all spatial options presented by the Plan would involve the delivery of housing within the 5km buffer of the SPA, it is considered that the location of the land east of Lindford Chase adjacent to the existing Bordon Inclosure SANG presents an opportunity to contribute towards the delivery of additional SANG. It is envisaged that the delivery of SANG on the promoted site would be realised alongside any allocation to deliver care-related development on site. Claremont Planning, on behalf of European Property Ventures (Hampshire) Ltd would be amenable to further engagement with the Council with respect to securing the delivery of SANG through the site's



redevelopment. It is presently envisaged that built form would be directed to the southern extent of the site, with the northern extent of the site made available for SANG.

## 7. Infrastructure

**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**

**INF3a: Please explain your answer**

- 7.1. Paragraph 73 of the Framework recognises the contribution that planning for a larger scale of development can make towards securing the delivery of infrastructure, through both on-site provision and developer contributions required through CIL and Section 106 contributions. Planning for a larger scale of development therefore ensures that the critical mass needed to deliver additional infrastructure is achieved.
- 7.2. Planning for the delivery of infrastructure provision through smaller sites dispersed across the District is not supported. Paragraph 16 of the Framework requires Local Plans to be prepared with the objective of contributing to the achievement of sustainable development with a critical element of the social objective being the identification and coordination of infrastructure delivery. Whilst smaller sites may secure the delivery of some infrastructure, it is considered likely that this approach will result in the piecemeal delivery of infrastructure rather than the coordinated delivery envisaged by national policy.
- 7.3. As such, it is advised that a combination of small, medium, and large sites presents the best outcome for infrastructure provision, where the delivery of strategic improvements or new infrastructure can best be secured through planning for larger scales of development. However, the delivery of small and medium sized sites can also assist with infrastructure delivery secured through developer contributions or on-site provision where feasible. Crucially, the delivery of small and medium sized sites can assist in delivering infrastructure to safeguard and improve the sustainability of smaller settlements and rural communities.

## 8. Development Strategy and Spatial Distribution

**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**



- 8.1. On behalf of European Property Ventures (Hampshire) Ltd, Claremont Planning consider that Option 1: Disperse new development to a wider range of settlements is the preferred spatial strategy. Followed by Option 3: Distribute new development by population. Option 2: Concentrate new development in the largest settlements, and Options 4: concentrate development in a new settlement represent the least preferred spatial options.

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

- 8.2. Option 1: Disperse new development to a wider range of settlements represents the preferred spatial strategy for the emerging Local Plan. To ensure that the Plan will contribute towards securing sustainable development, it is advised that this option should distribute growth throughout the District in accordance with the revised settlement hierarchy, provided that the deficiencies in the settlement hierarchy review methodology identified through this submission are addressed. It is considered that directing new development to a wider range of settlements will assist in identifying a sufficient supply and appropriate mix of sites to meet the emerging housing requirement. This will ensure that the emerging Local Plan will contribute to the delivery of sustainable development and satisfy the requirement of Paragraph 69 of the Framework for sufficient land to be identified to meet at least 10% of the housing requirement on small and medium sized sites.
- 8.3. European Property Ventures (Hampshire) Ltd support the Council's identification that growth at Lindford could contribute to the delivery of Option 1, in recognition of the suitability and sustainability of Lindford to accommodate further development. However, the Spatial Options Topic Paper predicates an assessment of the sustainability of settlements upon opportunities for walking and cycling. Whilst this is a valid consideration, the Council should also appreciate the strategic connections between Lindford and Bordon when considering the suitability and sustainability of Lindford to accommodate additional growth through the emerging Local Plan. It is maintained that the promoted Land East of Lindford Chase could contribute to the delivery of growth at Lindford through this Option where the site occupies a sustainable location adjacent to the settlement boundary and existing residential development established at the settlement. The site's strong relationship with the established urban area ensures that the site is advantageously located to access local services and facilities by sustainable modes of transport. The presence of established, mature vegetation at the site boundaries also presents an opportunity to establish a new, defensible edge to the settlement.
- 8.4. Spatial Option 3: Distribute new development by population is generally supported. The Spatial Options Topic Paper identifies that this Option is based upon data from the 2022 HEDNA, which identified population differences between the north-western, north-eastern, and southern parishes of the District. The Topic Paper identifies that this Option would seek to direct 39% of new homes towards the north-east of the District, with 37% and 25% directed towards the north west and southern areas of the District respectively. It is considered that development at Lindford could contribute to the delivery of this Option, given the relative sustainability of the settlement when compared to other smaller settlements located within the north-eastern area and constraints to development presented by the Wealden Heaths Phase II SPA.



- 8.5. However, the Council's justification for Option 3 considers that distributing growth in accordance with population will ensure that new development is directed to communities that could best accommodate this growth. This is not considered to represent a robust approach to determining the spatial strategy for the Plan, where the distribution of growth would be predicated upon an assumption that population determines the sustainability of locations. The tests for soundness presented at Paragraph 35 of the Framework requires that Local Plans provide an appropriate strategy which is based upon proportionate evidence. Should Option 3 be progressed, the Council should seek to distribute growth within each of the respective areas identified in accordance with the settlement hierarchy to ensure that a justified and evidenced strategy is presented.
- 8.6. Option 2: Concentrate development at the largest settlements is not supported. Whilst the sustainability and ability of larger settlements to accommodate development is recognised, this Option would constrain housing delivery at medium sized settlements such as Lindford which similarly comprise sustainable locations capable of accommodating additional growth. This would constrain the delivery of both market and affordable housing within rural settlements, contrary to Paragraph 78 of the Framework, whilst also limiting the potential for improvements in local services and facilities to be achieved through growth in small and medium settlements.
- 8.7. Spatial Option 4 proposes to concentrate development at a new settlement, with aspirations to deliver approximately 1,500 dwellings in accordance with 'garden village' principles identified by the Council. The development of a new garden community is not supported in principle, and the identification of a suitable site to accommodate development of this scale is considered to be challenging given the environmental constraints presented by the South Downs National Park and presence of internationally protected sites within the District. It should be recognised that garden settlements require the coordinated delivery of a significant scale of homes and infrastructure which can result in substantial lead in times. The complexities of planning for the delivery of a new garden settlement are well documented, and a number of Local Plans have not been found sound at Examination because of this. Additionally, Paragraph 35 of the NPPF requires Local Plan to satisfy tests for soundness, which include the imperative for a Plan to be effective and deliverable. Demonstrating this with respect to a new garden village settlement may be particularly challenging due to complexities relating to securing the funding required to deliver the necessary infrastructure to support the development of a new garden community at the time of Plan preparation.
- 8.8. In addition, the Council envisage that Option 4 could deliver almost half of the 3,405 dwellings to be planned for through the emerging Local Plan. Given the identified challenges of housing delivery through garden village settlements, it is considered imperative that the Council also seek to allocate a sufficient number and range of sites to ensure housing delivery in the short and medium term following the Plan's adoption if this option is progressed.

**Notes**

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<p>Project Land adjoining Linford Chase, Lindford</p> <p>Title Site Location Plan</p>	<p>Drawing Number CLR002-1</p> <p>REV 00</p>	<p>Status FINAL</p> <p>Job Ref CLR002</p>	<p>Drawn By [Redacted]</p> <p>Scale @ A4 1:2500</p>	<p>PM/Checked by [Redacted]</p> <p>Date Created 13/05/2016</p>	<p>Approved Approved</p>	 <p>Claremont Planning Consultancy Suite 205 - Second Floor, 2 Snow Hill, Snowhill Queensway, Birmingham B4 6GA T: 0121 231 3610 M: 077791 12641</p>
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Planning Policy Team  
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localplan@easthants.gov.uk

4<sup>th</sup> January 2023  
[REDACTED]

Dear Sir/Madam,

**REPRESENTATIONS TO DRAFT LOCAL PLAN ISSUES AND PRIORITIES 2021-2040  
(REGULATION 18)**

I write on behalf of my client, [REDACTED], to make representations to East Hampshire District Council's Draft Local Plan 2021-2040 Issues and Priorities (Regulation 18), which is currently out for consultation. Our client is the freeholder owner of a major site in Alton and has previously engaged with various planning policy consultations including a Call for sites. There site is included within the LAA (ref LAA/AL-029).

**Representations**

***POP1***

My client considers that the standard method should be used. Government guidance is clear that the standard method is used were local housing need is used. There is no compelling evidence to suggest a departure from this methodology and therefore this method should be used. In accordance with the NPPF this should also be a minimum number, and this should be expressly made clear in the Local Plan.

***POP3, POP4***

Our client considers that East Hants should offer to assist with unmet needs from surrounding authorities where required. This should be regardless of scale and location. The NPPF is clear that plans should be positively prepared and where practical to do so meet the need from neighbouring boroughs. There is sufficient land availability within East Hants to deliver this unmet need. Therefore, there would need to be very compelling reasons to not meeting the unmet need from neighbouring authorities. Our client has a site in a sustainable location in Alton that is available, deliverable and viable for development.

***HOU1, 1a, 2***

Our client supports a specific policy on older persons accommodation. Our client considers this policy should include a target of a minimum number of new homes required. The policy should contain enough flexibility within it for the homes to be delivered in the right locations, and

therefore not be so prescriptive on what numbers should be delivered where.

**HOU7**

Affordable housing policies do not require significant change, however the policy needs to be clear that the policy requirement is subject to viability.

**CFS1, CFS1a**

We have already submitted our client's site as a site suitable, available, deliverable and viable for housing development. The address is land West of Old Odiham Road, Alton, and site reference LAA (ref LAA/AL-029).

**DEV1, DEV2**

Our client considers Option 2 the preferred option for growth, followed by option 3,1 and 4. This will allow the majority of new housing to be focused in and around the major towns in the authority that contain the widest range of services. This will allow a far more sustainable pattern of development and housing where residents can access jobs and services without the need to drive. The major settlements also have better public transport accessibility e.g. Alton is on the train line. The NPPF is clear that plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible. This includes the use of minimum density standards for town centre and locations well served by public transport. The policy should therefore go further in specifying housing targets and densities as a minimum for sustainably located towns such as Alton/

**Conclusion**

Our client, [REDACTED] supports a new Local Plan being brought forward. I trust you can consider the views above.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**M7 PLANNING LTD**

**LAND OFF SELBORNE ROAD AND WINDMILL LANE, ALTON**

**REPRESENTATIONS TO EAST HAMPSHIRE LOCAL PLAN ISSUES AND PRIORITIES (REG.18)  
CONSULTATION (JANUARY 2023)**

**January 2023**



**RTPI**  
Chartered Town Planners

**URBAN  
DESIGN  
GROUP**

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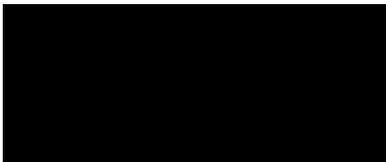
Email: [REDACTED]

Tel: 01793 612173

**CLIENT** M7 Planning Ltd

**PROJECT** Land off Selborne Road and Windmill Lane, Alton

**REPORT TITLE** Representations to East Hampshire Local Plan Issues and Priorities (Reg.18) Consultation (January 2023)



**Issue Date:** January 2023

**REPORT REVISIONS**

[Redacted]				
[Redacted]				

**CONTENTS:**

1. **INTRODUCTION**..... **4**  
    M7 Planning ..... 4

2. **RESPONSE TO REG.18 CONSULTATION QUESTIONS** ..... **5**

3. **SUMMARY AND CONCLUSIONS**..... **8**

**Appendices:**

- 1. Site Location Plan
- 2. Illustrative Masterplan

## 1. INTRODUCTION

1.1 David Jarvis Associates has been instructed by M7 Planning Limited (“M7”) to prepare representations in response to the emerging East Hampshire Local Plan Issues and Priorities (Regulation 18) Consultation (EHLP).

1.2 M7 is promoting an area of land on the southern edge of Alton (‘Land off Selborne Road and Windmill Lane’), within the East Hampshire District Council (EHDC) area for a residential-led development of up to 1100 dwellings (see site location plan at **Appendix 1**). The land, which is currently used primarily for agricultural purposes, extends to just under 63ha in area, with Windmill Lane running along its eastern edge, the A339 running along its western edge and the main A31 running along the southern boundary.

### **M7 Planning**

1.3 M7 Planning is a residentially focused land promoter and professional investor in land and property in the South of England.

1.4 Achieving planning permission is at the heart of what M7 do and they carefully manage each and every aspect of the process, providing a tailored approach for each site they take on. M7 are passionate about design and place making and they believe that these things go hand in hand.

### **Background**

1.5 The majority of the site indicated in **Appendix 1** has previously been submitted to the Council as part of the Land Availability Assessment (LAA) process.

1.6 Site ref LAA/AL-056 refers to a site of 52.54ha that is promoted for a mixed-use development incorporating approximately 650 dwellings. With regard to “suitability”, the LAA states:

*“Small part of site area TPO, site slopes from east to west, southern corner of the site in Flood zone 2 and 3, south eastern boundary surface water flooding, countryside character and landscape, noise impact from A31.”*

1.7 In addition, site references LAA/AL-013 (Land at Weysprings), LAA/AL-14 (Land at Weysprings Park) and LAA/AL-019 (Windmill House, Windmill Lane) are also contained within the LAA.

1.8 The overall LAA conclusion is that the above sites are available, achievable and developable.

## 2. RESPONSE TO REG.18 CONSULTATION QUESTIONS

### Vision – Question VIS3

- 2.1 M7 consider that the overall Vision should incorporate specific reference to the preferred strategy on the dispersal of housing. In M7's view, the Council's spatial strategy should focus on the concentration of development to the larger settlements and to areas that are likely to have the least impact on important habitats and which limit impact with regard to water quality/nutrient neutrality.

### Population and Housing - Question POP1

- 2.2 Use of the standard method should be continued.
- 2.3 It is clear that the Government are looking to maintain use of the standard method for calculating housing need. The latest proposed revisions to the NPPF have advised that the method will be reviewed following an assessment of the 2021 Census, the results of which are due to be published in 2024.
- 2.4 It is therefore most appropriate to continue use of the standard method for calculating housing need. However, this approach may require review given the method may well change during the course of the emerging Local Plan timetable towards adoption.

### Population and Housing – Question POP2

- 2.5 M7 consider that there are strong reasons to increase the housing need figure of 517 dwellings per annum (dpa). It is noted that the South Downs National Park (SDNP) has not met its full housing needs requirement of 113 dpa, which is likely to leave an overall shortfall of around 260 dwellings for the current plan period to 2028.
- 2.6 The latest housing projections suggest SDNP should provide 115 dpa, although the Reg.18 Plan suggests SDNP are likely to maintain the 100dpa commitment.
- 2.7 As a result, the overall shortfall will only increase, further impacting on affordability and supply within SDNP and beyond. EHDC should therefore take the additional 15 dpa, giving a total housing figure of **532 dpa**.

### Population and Housing - Question POP3

- 2.8 As referred to above, M7 Planning consider that East Hampshire should agree to meet some of the housing needs of East Hampshire's part of the SDNPA in order that the historic shortfall position is not exacerbated. It is accepted that the SDNP will accommodate the majority of their own needs, particularly affordable housing and where housing will support existing communities (e.g. Petersfield).
- 2.9 Whilst SDNP has previously agreed to meet the majority of its housing requirement, the shortfall can be accommodated within settlements close to the National Park but within EHDC (e.g. Alton).

### Population and Housing – Question POP4

- 2.10 M7 consider that EHDC should offer to assist with all unmet needs, regardless of scale and location.
- 2.11 Assessment of unmet need should go beyond the PfSH requirements and potentially look at accommodating shortfalls in other areas, primarily due to the issues affecting the Solent with regard to nutrient neutrality. Areas of East Hampshire outside the SSSI nutrient neutrality catchments (e.g.

Alton) could assist with the unmet needs resulting from the delivery shortfall on the other PFSH authorities.

#### **Types of Housing – Questions HOU5 and HOU6**

- 2.12 M7 has no particular concerns regarding a policy specifying a percentage of smaller homes on development sites. However, this should only relate to development on sites of 11+ dwellings (i.e. major developments).
- 2.13 In addition, a clause should be included within any policy to state that where proposals do not provide for the stated smaller homes percentage, this will need to be justified through evidence (e.g. viability, market demand). Demand for particular types of housing can fluctuate and developers should be permitted to deviate from policy requirements where necessary, whilst ensuring development continues to meet overall housing requirements within EHDC.

#### **Types of Housing – Question HOU7**

- 2.14 The current percentage of 40% is appropriate.

#### **Types of Housing – Question HOU7a**

- 2.15 It is clear that there is a significant and highly concerning affordability issue within East Hampshire, where the affordability ratio is 13.4 compared to an England average of 9.1x (47% higher than the national average). It is M7 Planning's view that the 40% requirement should be maintained, and that delivering the significant level of affordable housing required is best achieved through the allocation of medium - large (i.e. 150+ dwellings) greenfield sites in sustainable locations on the edge of the existing larger towns and villages.

#### **Development Options – Question DEV1**

- 2.16 M7 would rank the 4 options put forward as follows:
- Option 2 – concentrate new development in the larger settlements
  - Option 3 – distribute new development by population
  - Option 1 – concentrate new development to a wider range of settlements
  - Option 4 – concentrate development in a new settlement

#### **Development Options – Question DEV2**

- 2.17 M7 consider that Option 2 is the most appropriate, although the option should state "*concentrate new development at the larger settlements*", given that such developments are likely to primarily involve the provision of extensions to the larger settlements rather than sites within the existing settlement boundaries.
- 2.18 The provision of additional housing at the larger settlements (e.g. Alton) will help to maintain their role as key service centres, thus ensuring that the majority of the population within East Hampshire has good access to services and facilities that do not necessarily require use of the private car.
- 2.19 Additional housing at these locations could also help to increase the overall level of facilities in the local area, which may be delivered as part of larger developments on the edge of such settlements, depending on the level of existing provision.

2.20 Furthermore, the provision of additional housing at the larger settlements can help to support the viability of existing public transport or support new services, improving the overall accessibility of such settlements and providing local residents with the option of accessing services by means other than the private car.

2.21 Option 2 therefore represents the most sustainable option.

#### **General Comments - Question GEN2**

2.22 With regard to M7's view on the proposed development options, they would like to emphasise the importance of the main settlement of Alton as a location for further strategic growth.

2.23 Alton is one of the key settlements within EHDC and is relatively unconstrained; it lies outside the River Itchen and Solent SSSI nutrient neutrality catchment zones and it is not affected significantly by other environmental or heritage issues. It is also well-served by public transport, including a train station.

2.24 M7 are promoting a 63ha plot of land on the southern edge of Alton (land between Selborne Road and Windmill Lane – see **Appendix 1**) for residential development. The site has a net developable area of around 30ha which could accommodate up to 1100 dwellings with associated community facilities and public open space (see **Appendix 2**).

2.25 A new link road will be provided through the development site, from the A339 (Selborne Road) on the western boundary through to the B3004 via Windmill Hill on the eastern boundary. A series of active travel routes will be provided through the development, providing pedestrian and cycle routes through to the existing urban area to the north of the site.

2.26 The illustrative masterplan has been designed based on initial transport and access design advice. It has also taken into account advice a landscape and visual assessment, primarily considering the impact on the National Park which lies to the south of Alton beyond the A31. The masterplan ensures retention of the open ridge on the southern edge of the main urban area, minimising impact on the SDNP. Further detailed due diligence will be completed shortly, which will assist with the production of future iterations of the masterplan.

2.27 Development zones also avoid the Flood Zone 3 area on the site's western boundary and maintain non-car dependant connections to Alton via the new and existing pedestrian and cycle routes.

### **3. SUMMARY AND CONCLUSIONS**

- 3.1 These representations have been prepared by David Jarvis Associates, on behalf of M7 Planning Ltd in response to the EHLP Reg.18 Issues and Priorities.
- 3.2 M7 are promoting Land off Selborne Road and Windmill Lane, Alton for housing development incorporating:
- Up to 1100 homes across a wide range of dwelling types and tenures to meet all housing needs including affordable housing;
  - Open spaces and recreational areas;
  - Areas for biodiversity improvements
  - Community facilities including a local centre, primary school and allotments;
  - Cycle and pedestrian routes connecting the site to Alton.
- 3.3 These proposals will significantly assist the Council in meeting key objectives in relation to delivering homes, sustainability and connectivity.
- 3.4 M7 would welcome the opportunity to meet with EHDC to discuss the unique opportunity that that this provides to deliver much needed housing and affordable housing whilst meeting the objectives of the EHLP.

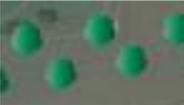
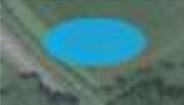
**Appendix 1**  
**Site Location Plan**



Land off Windmill Lane, Alton

Red Line Boundary Plan

**Appendix 2**  
**Framework Plan**

- |  |  |   |  |   |                                       |   |  |   |                                   |
|--|--|---|--|---|---------------------------------------|---|--|---|-----------------------------------|
|   | 1. Access to Development                     |   | 5. New Local Centre                              |   | 9. Biodiversity Opportunities         |   | 13. Windmill Hill, Existing Parkland                   |   | 17. Listed Buildings              |
|  | 2. Residential Dwellings                     |  | 6. New access roundabout                         |  | 10. Pocket Parks                      |  | 14. Strategic Planting                                 |  | 18. Existing Public Rights of Way |
|  | 3. Low level over 55's residential dwellings |  | 7. New Active Travel Route                       |  | 11. Completed Residential Development |  | 15. Main Spine Road with Green Verges and Street Trees |  | 19. New Footpath Link             |
|  | 4. New primary School                        |  | 8. Greenlink/POS/Ecological Improvement Corridor |  | 12. Borovere Business Park            |  | 16. Attenuation  |  | 20. South Downs National Park     |



Land off Windmill Lane, Alton

Framework Plan

Date: January 2023 Rev: /



## **East Hampshire Local Plan 2021-2040**

### **Issues and Priorities Regulation 18 – Part 1**

#### **Response prepared on behalf of 6A Vision Homes in respect of their interest in land at Parsonage Farm, Catherington**

Responses to specific consultation questions as follows:

**CLIM6** – Very Happy

**CLIM6a** The principle of “Living Locally” is fully supported because this would result in more sustainable patterns of development.

**POP1** – The use of the standard method of calculating housing need is supported because this would ensure greater objectivity and certainty. There are no exceptional local circumstances in East Hampshire which would support deviation from the standard method. Furthermore, the Council’s own Technical Note: Testing the Standard Method for Housing Need in East Hampshire does not support a deviation from use of the standard method.

**POP2** – No

**POP2a** – The housing requirement of about 3405 houses is calculated using the standard method. We have supported the use of the standard method in our response to question POP1 above.

**POP3** – We support the need to plan to meet all the housing needs of East Hampshire’s part of the SDNPA.

**POP3a** – Any shortfall in the 115 per annum requirement within the East Hampshire part of the SDNPA should be made up within the East Hampshire areas outside of the National Park. This would ensure that the objectively assessed housing need for East Hampshire as a whole is met in full.

**POP4** – We support the principle of offering to assist the unmet needs of neighbouring authorities regardless of scale and location

**POP4a** – It is considered that the district has the capacity to accommodate additional development to assist in the delivery of housing to satisfy the unmet needs of neighbouring authorities.

**HOU5** – No

**DEV1** – Ranking of options as follows:

1 - Option 1

2 – Option 2

3 – Option 3

4 – Option 4



**DEV2** – We consider that the best and most sustainable option for housing distribution in the district is to distribute development a range of settlements (Option 1) to help meet the needs of individual communities. We fully support the three tiers of settlements identified on the plan for Option 1 which identifies smaller Tier 3 settlements, including Catherington, as the location for some new development. This is consistent with the approach taken in the Draft Local Plan of February 2019 which planned for a dispersed distribution of development in the district and identified a number of smaller settlements, including Catherington, as being suitable to accommodating small scale housing growth.

planning  
transport  
design  
environment  
infrastructure

**East Hampshire District Council: Local Plan (Regulation 18)  
Consultation Response**

**Bellway Strategic Ltd**

**January 2023**

DHA/MWB/TW/17293



# 1 Introduction

- 1.1.1 This representation has been prepared on behalf of Bellway Strategic Ltd in response to the East Hampshire District Council 'EHDC' Local Plan (Regulation 18) consultation which closes on 16<sup>th</sup> January 2023.
- 1.1.2 We understand that EHDC is in the process of preparing a new Local Plan to set out a strategy for development for the period to 2040 and that the Council is asking for views on principles that should determine where these homes should be built, and how the Council can deliver infrastructure improvements across East Hampshire.
- 1.1.3 Our client has land interests in Liphook. We recognise that this Local Plan consultation focuses on key issues and priorities only, and does not include proposed development sites. EHDC have requested that representations focus on the key issues, and are not specific. These representations have been drafted accordingly, but for the avoidance of doubt, Bellway's land interests relates to the following site:
- LAA/LIP-023 – Land East of Devils Lane, Liphook
- 1.1.4 The site also forms part of the larger strategic site, Land South East of Liphook (LAA/LIP-041) which was promoted through the Major Development Sites consultation by a consortium of landowners and developers.

## 2 Response to the Local Plan Core Questions

### 2.1 Vision

VIS1. How do you feel about this vision?

2.1.1 **Multiple Choice Answer:** Neutral

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

2.1.2 **Multiple Choice Answer:** No

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

2.1.3 **Answer:** The vision provides an aspiration which in isolation reads positively, but it includes little by the way of substance. Whilst the vision is not policy itself, it should set out a positive but realistic message of intention, which in EHDC's case must be to meet housing needs in full. At present it does not say this, and therefore we would suggest the following wording would be more appropriate (suggested additions are underlined):

*"By 2040 the East Hampshire district will allow all of our residents ~~will~~ to live in healthy, accessible and inclusive communities, where sufficient quality homes are provided for all, in sustainable and accessible locations, with local facilities and employment opportunities providing our communities with green and welcoming places to live, work and play and respond positively to the climate emergency. The vitality and viability of our existing settlements will be supported by allowing them to grow and thrive"*

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

2.1.4 **Answer:** Yes

VIS3a. Please explain your answer

2.1.5 **Answer:** The NPPG requires Local Plans to set out "a vision and a framework for the future development of the area, addressing needs and opportunities in relation to housing, the economy, community facilities and infrastructure" (001 Reference ID: 61-001-20190315). It also states that Local Plans provide an opportunity "to set out a positive vision for the area, but the plan should also be realistic about what can be achieved and when. This means paying careful attention to providing an adequate supply of land..." (Paragraph: 059 Reference ID: 61-059-20190315).

## 2.2 Overview

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

- *Climate Emergency*
- *Environment*
- *Population and Housing*
- *Types of Housing Needs*
- *Infrastructure*

### 2.2.1 Multiple Choice Answer:

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

## 2.3 Population & Housing

POP1. How do you think we should proceed?

### 2.3.1 Multiple Choice Answer: *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.*

POP1a. Please explain your answer.

### 2.3.2 Answer: the NPPF (paragraph 61) states that the local housing need should be calculated using the standard methodology, unless exceptional circumstances justify an alternative approach. In examining local plans, Inspectors have found that for exceptional circumstances to exist, a large proportion of the district must be affected by absolute constraints of high-order policy constraints, for example Green Belt, AONB, SSSIs, National Parks or flood risk. EHDC is not subject to these constraints, and this Local Plan specifically excludes the SDNP area.

### 2.3.3 The district enjoys good connections and a number of sustainable settlements. This includes the tier 1 settlement of Liphook which has capacity and potential to grow and features a wide range of services and facilities capable of supporting day to day activities for residents, and excellent road and rail connections. Accordingly there is no justification to depart from the standard methodology for calculating local housing need.

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

2.3.4 **Multiple Choice Answer:** No.

POP2a. Please explain your answer.

2.3.5 **Answer:** The district is not covered by a significant proportion of absolute or high-order policy constraints. The Major Developed Sites process showed that there are significant areas of unconstrained land which is available for development. This includes a large area to the South East of Liphook which is suitable and accessible, falling within the proposed 20-minute neighbourhood area for Liphook. All opportunities should be explored to deliver housing and growth in such sustainable, suitable and accessible areas.

2.3.6 Indeed, as set out elsewhere within these representations, there is a strong case for EHDC to be attributing a much greater portion of the 632 homes per year figure to the parts of the district outside of the SDNP, whilst opportunity should also be taken to accommodate unmet needs from elsewhere.

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.*

2.3.7 **Multiple Choice Answer:** All of the housing needs of East Hampshire's part of the SDNPA.

POP3a. Please explain your answer.

2.3.8 **Answer:** The assumption that the SDNPA can accommodate 115 dpa is not justified and is not based on consultation with the SDNPA. We believe it is inappropriate to push such a percentage into a constrained area, not least without consultation.

2.3.9 If the SDNP was not a separate planning authority, EHDC would no doubt be looking to accommodate the housing need in full outside of the national park area. The district includes many large, sustainable and accessible settlements including the tier 1 settlement of Liphook. The Major Development Sites exercise, and the Land Availability Assessment, show that there are significant areas of suitable, deliverable and available sites to accommodate the housing need outside of the SDNP. All opportunities should therefore be explored to accommodate the local housing need figure within the EHDC area outside of the SDNPA.

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.*

2.3.10 **Multiple Choice Answer:** Offer to assist with all unmet needs, regardless of scale and location.

POP4a. Please explain your reasons.

2.3.11 **Answer:** The Housing Needs and Requirements Background Paper identifies that there are unmet housing needs arising from the Partnership for South Hampshire (PfSH) area. In this regard, it should be noted that the PfSH published an updated Statement of Common Ground in December 2022 which identified a housing shortfall of some 20,000 homes, significantly higher than the previous identified shortfall of 12,000. EHDC's Housing Needs and Requirement Background Paper should be updated accordingly. Additionally, Havant and Chichester district councils have already approached EHDC about accommodating unmet needs.

2.3.12 With regard to Havant, it is notable that the Local Plan was withdrawn from examination in March 2022, and that the authority cannot demonstrate a five-year housing land supply. It also failed the Housing Delivery Test. Similarly, Fareham Borough Council cannot demonstrate a five-year housing land supply, and also failed the Housing Delivery Test.

2.3.13 It therefore seems certain that many neighbouring and nearby authorities will have unmet needs which will need to be accommodated elsewhere, to avoid a worsening housing supply crisis. It is therefore imperative that EHDC starts planning for this now.

## 2.4 Development Options

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.*

2.4.1 **Answer:**

1. *Option 2*

2. Option 1

3. Option 3

4. Option 4

DEV2. Why have you ranked the options this way?

- 2.4.2 **Answer:** Housing growth should be distributed proportionately to focus growth in the most sustainable locations. EHDC benefits from a number of sustainable and accessible settlements. Whilst the availability of land needs to be fully understood in each of these settlements, it is clear that Liphook has a significant area of land which is suitable and available for development to the south east of the settlement. We therefore welcome the Council's recognition of Liphook as a tier 1 settlement.
- 2.4.3 We support the Council's intentions with regard to the 20 Minute Neighbourhood concept, so far as it applies to Liphook. The Settlement Hierarchy Background Paper sets out a sound and methodological approach to defining the 20-Minute neighbourhoods, by reference to village centres, primary schools, and mainline railway stations. Liphook contains each of these and their relatively tight distribution means that a significant proportion of the existing settlement falls within the proposed 20-Minute Neighbourhood Area. Notably, this includes the large undeveloped area to the South East of Liphook which has in the recent past been promoted as a Major Developed Site by a consortium of landowners and developers.
- 2.4.4 Whilst we respect EHDC's request for these representations to be non-site-specific, ultimately EHDC will need to understand the relative availability of suitable housing land within each of the settlements before being able to settle on a chosen Spatial Development Option. We can say with certainty that Liphook has a large amount of available land, to the south east, which could accommodate a significant proportion of the district's housing need.
- 2.4.5 The Settlement Hierarchy Background Paper provides a valuable piece of up-to-date evidence in order to rank the district's settlements in terms of their relative provision of services, facilities and accessibility. We strongly support the inclusion of Liphook within tier 1, which accurately reflects the size, function and accessibility of the settlement. It is clear that a large proportion of housing could be provided within the proposed 20-Minute Neighbourhood Area within one of the top tier settlements, and ultimately the chosen Spatial Development Option must ensure that Liphook takes a significant proportion of the district's housing requirement.
- 2.4.6 We wish to take this opportunity to highlight that within the Regulation 18 consultation under the section 'Development Options', Option 2 contains a misdrawing of Liphook. It is a tier 1 settlement so the "blob" should be larger than is currently highlighted on the Option 2 map.

DEV3. Are there any alternative options we should consider?

- 2.4.7 **Multi-Choice Answer:** Yes

DEV3a. If yes, please explain.

- 2.4.8 **Answer:** At this stage it is impossible to conclude with certainty which Spatial Development Option should be settled upon. Further testing needs to be undertaken with regard to the availability and suitability of sites within and adjoining the settlements. Whilst we support elements of options 1, 2 and 3, the ultimate chosen spatial strategy is likely to be an amalgamation of the three.

## 2.5 Types of Housing Need

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.*

- 2.5.1 **Multiple Choice Answer:** Each of the above

HOU1a. Please explain your reasons.

- 2.5.2 **Answer:** We recognise that the HEDNA and census data highlights a growing population of over-65s within the district. This is not surprising and reflects a general trend nationally. It is vital, therefore, that adequate provision is made for specialist older-persons accommodation of varying types, informed by evidence. This must be planned for and not left to windfalls. By properly planning for specialist accommodation in this way, there can be certainty that the need can be met in a sustainable manner, focusing older persons accommodation within accessible locations, as is necessary. The Local Plan can ensure that the Tier 1 settlements provide an appropriate share within the 20-Minute Neighbourhood Areas.

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

- 2.5.3 **Answer:** Older person's housing can either be provided on specific sites, or as part of larger strategic opportunities. The Local Plan should look to allocate specific sites and also identify broad locations within strategic sites for older-persons accommodation.

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

- 2.5.4 **Multiple Choice Answer:** Yes.

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

- 2.5.5 **Multiple Choice Answer:** No.

HOU4a. Please explain your answer.

2.5.6 **Answer:** Many local planning authorities look to implement blanket percentage policies for the provision of adaptable housing on development sites, as an easy way to have certainty that an overall need can be met. However, this is not often justified by reference to evidence of need in terms of type of requirements and specific nature of need. Moreover, not all sites will be suitable for adaptable housing given site characteristics, for example levels, and this policy should therefore ensure that adaptable housing is looked at on a site-by-site basis, due to the huge variability between sites.

2.5.7 A real-life risk of setting a blanket percentage requirement is that adaptable homes often end up being occupied by residents who have no need to adapt homes, meaning that the need is not genuinely met. Needs evolve over time and it is difficult for a Local Plan to accurately reflect such specific needs over a Local Plan period.

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

2.5.8 **Multiple Choice Answer:** No

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*

2.5.9 **Multiple Choice Answer:** Stay the same.

HOU7a. Please explain your answer

2.5.10 **Answer:** There is a chronic housing need in the South of England. This applies to general open market housing, as well as specialist housing including affordable homes. Affordable housing comes in many different tenures, and each has its challenges in terms of viability and management. Whilst Bellway supports the delivery of affordable housing, it is important that this does not threaten the viability of general open market housing. Bellway would therefore object to any proposal to increase the minimum requirement for affordable housing above the existing policy level.

2.5.11 Nevertheless, in certain circumstances developers may look to over-provide affordable housing, above the policy level, where viability supports it and to deliver a specific need. The policy therefore needs to be flexible and should avoid setting a maximum provision of affordable housing.

## 2.6 Infrastructure

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

- *Transport.*

- *Health.*
- *Schools, Colleges.*
- *Community facilities.*
- *Sport.*
- *Green spaces.*
- *Energy supplies and water.*
- *Internet and mobile phone reception.*

2.6.1 **Multiple-Choice Answer:** All of the above

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

2.6.2 **Multiple-Choice Answer:** Neutral

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.*

2.6.3 **Multiple-Choice Answer:** Large sites

INF3a. Please explain your answer.

2.6.4 **Answer:** The Major Development Sites consultation process revealed that there are a number of potential large scale development sites across the district. Whilst EHDC has ultimately decided to abandon that approach (which did not seek to allocate an MDS within Liphook) it must be acknowledged that medium and large sized sites provide opportunities to provide infrastructure in an integrated way as part of sustainable new communities. The availability of land to the South East of Liphook provides an excellent opportunity to provide a range of infrastructure requirements, within the 20-Minute Neighbourhood Area and integrated into a new sustainable community.

### 3 Conclusion

- 3.1.1 Bellway welcome the opportunity to participate in East Hampshire District Council 'EHDC' Local Plan (Regulation 18) consultation which closes on 16<sup>th</sup> January 2023. We note EHDC's request for representations to be non-site-specific, and our responses to the consultation have been formulated accordingly.
- 3.1.2 These representations have been prepared following a thorough review of the consultation document and the relevant Background Papers. Whilst it is unfortunate that the previous emerging Local Plan was abandoned, it is positive that EHDC are now looking to positively plan.
- 3.1.3 We note many positive aspects of the consultation document which has the potential to lead to a justified and sound Local Plan. In particular, we support the recognition that Liphook should sit at the top of the settlement hierarchy as a Tier 1 settlement, and we welcome the intention to adopt the 20-Minute Neighbourhood principles in so far as they apply to Liphook.
- 3.1.4 It is clear that there is a chronic housing need across the south of England, and notably in Hampshire where many authorities have struggled to get Local Plans in place and cannot meet their housing supply or delivery requirements. It is therefore vital that EHDC positively prepares a Local Plan which meets the local housing need in full and accommodates unmet needs from neighbouring authorities.
- 3.1.5 Whilst we have avoided any site specific representations, a review of this Local Plan, the background papers and the previous Major Development Sites consultation process leads to a clear conclusion that Liphook must accommodate a significant proportion of the district's housing need. It is a highly sustainable location, reflected in its position at the top of the settlement hierarchy, and has a large amount of available and suitable land to the south east of the settlement which should be allocated for housing and infrastructure provision.
- 3.1.6 Given the non-site-specific nature of these representations, we wish to reserve our right to comment on subsequent iterations of the emerging Local Plan, and we also wish to meet with officers at the earliest opportunity to discuss the availability of residential development land in Liphook.

planning  
transport  
design  
environment  
infrastructure

**East Hampshire District Council: Local Plan (Regulation 18)  
Consultation Response**

**Countryside Partnerships**

**January 2023**

DHA/MWB/TW/17099



# 1 Introduction

- 1.1.1 This representation has been prepared on behalf of Countryside Partnerships in response to the East Hampshire District Council 'EHDC' Local Plan (Regulation 18) consultation which closes on 16<sup>th</sup> January 2023.
- 1.1.2 We understand that EHDC is in the process of preparing a new Local Plan to set out a strategy for development for the period to 2040 and that the Council is asking for views on principles that should determine where these homes should be built, and how the Council can deliver infrastructure improvements across East Hampshire.
- 1.1.3 Our client has land interests in Liphook. We recognise that this Local Plan consultation focuses on key issues and priorities only, and does not include proposed development sites. EHDC have requested that representations focus on the key issues, and are not specific. These representations have been drafted accordingly, but for the avoidance of doubt, Countryside's land interests relate to the following sites:
- LAA/LIP-019 - Land at Old Shepherds Farm, Liphook
  - LAA/LIP-020 - Land at Devils Lane, Liphook
- 1.1.4 The sites also form part of the larger strategic site, Land South East of Liphook (LAA/LIP-041) which was promoted through the Major Development Sites consultation by a consortium of landowners and developers.

## 2 Response to the Local Plan Core Questions

### 2.1 Vision

VIS1. How do you feel about this vision?

2.1.1 **Multiple Choice Answer:** Neutral

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

2.1.2 **Multiple Choice Answer:** No

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

2.1.3 **Answer:** The vision provides an aspiration which in isolation reads positively, but it includes little by the way of substance. Whilst the vision is not policy itself, it should set out a positive but realistic message of intention, which in EHDC's case must be to meet housing needs in full. At present it does not say this, and therefore we would suggest the following wording would be more appropriate (suggested additions are underlined):

*"By 2040 the East Hampshire district will allow all of our residents ~~will~~ to live in healthy, accessible and inclusive communities, where sufficient quality homes are provided for all, in sustainable and accessible locations, with local facilities and employment opportunities providing our communities with green and welcoming places to live, work and play and respond positively to the climate emergency. The vitality and viability of our existing settlements will be supported by allowing them to grow and thrive"*

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

2.1.4 **Answer:** Yes

VIS3a. Please explain your answer

2.1.5 **Answer:** The NPPG requires Local Plans to set out "a vision and a framework for the future development of the area, addressing needs and opportunities in relation to housing, the economy, community facilities and infrastructure" (001 Reference ID: 61-001-20190315). It also states that Local Plans provide an opportunity "to set out a positive vision for the area, but the plan should also be realistic about what can be achieved and when. This means paying careful attention to providing an adequate supply of land..." (Paragraph: 059 Reference ID: 61-059-20190315).

## 2.2 Overview

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

- *Climate Emergency*
- *Environment*
- *Population and Housing*
- *Types of Housing Needs*
- *Infrastructure*

### 2.2.1 Multiple Choice Answer:

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

## 2.3 Population & Housing

POP1. How do you think we should proceed?

### 2.3.1 Multiple Choice Answer: *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.*

POP1a. Please explain your answer.

### 2.3.2 **Answer:** the NPPF (paragraph 61) states that the local housing need should be calculated using the standard methodology, unless exceptional circumstances justify an alternative approach. In examining local plans, Inspectors have found that for exceptional circumstances to exist, a large proportion of the district must be affected by absolute constraints of high-order policy constraints, for example Green Belt, AONB, SSSIs, National Parks or flood risk. EHDC is not subject to these constraints, and this Local Plan specifically excludes the SDNP area.

### 2.3.3 The district enjoys good connections and a number of sustainable settlements. This includes the tier 1 settlement of Liphook which has capacity and potential to grow and features a wide range of services and facilities capable of supporting day to day activities for residents, and excellent road and rail connections. Accordingly there is no justification to depart from the standard methodology for calculating local housing need.

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

2.3.4 **Multiple Choice Answer:** No.

POP2a. Please explain your answer.

2.3.5 **Answer:** The district is not covered by a significant proportion of absolute or high-order policy constraints. The Major Developed Sites process showed that there are significant areas of unconstrained land which is available for development. This includes a large area to the South East of Liphook which is suitable and accessible, falling within the proposed 20-minute neighbourhood area for Liphook. All opportunities should be explored to deliver housing and growth in such sustainable, suitable and accessible areas.

2.3.6 Indeed, as set out elsewhere within these representations, there is a strong case for EHDC to be attributing a much greater portion of the 632 homes per year figure to the parts of the district outside of the SDNP, whilst opportunity should also be taken to accommodate unmet needs from elsewhere.

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.*

2.3.7 **Multiple Choice Answer:** All of the housing needs of East Hampshire's part of the SDNPA.

POP3a. Please explain your answer.

2.3.8 **Answer:** The assumption that the SDNPA can accommodate 115 dpa is not justified and is not based on consultation with the SDNPA. We believe it is inappropriate to push such a percentage into a constrained area, not least without consultation.

2.3.9 If the SDNP was not a separate planning authority, EHDC would no doubt be looking to accommodate the housing need in full outside of the national park area. The district includes many large, sustainable and accessible settlements including the tier 1 settlement of Liphook. The Major Development Sites exercise, and the Land Availability Assessment, show that there are significant areas of suitable, deliverable and available sites to accommodate the housing need outside of the SDNP. All opportunities should therefore be explored to accommodate the local housing need figure within the EHDC area outside of the SDNPA.

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.*

2.3.10 **Multiple Choice Answer:** Offer to assist with all unmet needs, regardless of scale and location.

POP4a. Please explain your reasons.

2.3.11 **Answer:** The Housing Needs and Requirements Background Paper identifies that there are unmet housing needs arising from the Partnership for South Hampshire (PFSH) area. In this regard, it should be noted that the PFSH published an updated Statement of Common Ground in December 2022 which identified a housing shortfall of some 20,000 homes, significantly higher than the previous identified shortfall of 12,000. EHDC's Housing Needs and Requirement Background Paper should be updated accordingly. Additionally, Havant and Chichester district councils have already approached EHDC about accommodating unmet needs.

2.3.12 With regard to Havant, it is notable that the Local Plan was withdrawn from examination in March 2022, and that the authority cannot demonstrate a five-year housing land supply. It also failed the Housing Delivery Test. Similarly, Fareham Borough Council cannot demonstrate a five-year housing land supply, and also failed the Housing Delivery Test.

2.3.13 It therefore seems certain that many neighbouring and nearby authorities will have unmet needs which will need to be accommodated elsewhere, to avoid a worsening housing supply crisis. It is therefore imperative that EHDC starts planning for this now.

## 2.4 Development Options

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.*

2.4.1 **Answer:**

1. *Option 2*

2. Option 1

3. Option 3

4. Option 4

DEV2. Why have you ranked the options this way?

- 2.4.2 **Answer:** Housing growth should be distributed proportionately to focus growth in the most sustainable locations. EHDC benefits from a number of sustainable and accessible settlements. Whilst the availability of land needs to be fully understood in each of these settlements, it is clear that Liphook has a significant area of land which is suitable and available for development to the south east of the settlement. We therefore welcome the Council's recognition of Liphook as a tier 1 settlement.
- 2.4.3 We support the Council's intentions with regard to the 20 Minute Neighbourhood concept, so far as it applies to Liphook. The Settlement Hierarchy Background Paper sets out a sound and methodological approach to defining the 20-Minute neighbourhoods, by reference to village centres, primary schools, and mainline railway stations. Liphook contains each of these and their relatively tight distribution means that a significant proportion of the existing settlement falls within the proposed 20-Minute Neighbourhood Area. Notably, this includes the large undeveloped area to the South East of Liphook which has in the recent past been promoted as a Major Developed Site by a consortium of landowners and developers.
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- 2.4.5 The Settlement Hierarchy Background Paper provides a valuable piece of up-to-date evidence in order to rank the district's settlements in terms of their relative provision of services, facilities and accessibility. We strongly support the inclusion of Liphook within tier 1, which accurately reflects the size, function and accessibility of the settlement. It is clear that a large proportion of housing could be provided within the proposed 20-Minute Neighbourhood Area within one of the top tier settlements, and ultimately the chosen Spatial Development Option must ensure that Liphook takes a significant proportion of the district's housing requirement.
- 2.4.6 We wish to take this opportunity to highlight that within the Regulation 18 consultation under the section 'Development Options', Option 2 contains a misdrawing of Liphook. It is a tier 1 settlement so the "blob" should be larger than is currently highlighted on the Option 2 map.

DEV3. Are there any alternative options we should consider?

- 2.4.7 **Multi-Choice Answer:** Yes

DEV3a. If yes, please explain.

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## 2.5 Types of Housing Need

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.*

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HOU1a. Please explain your reasons.

- 2.5.2 **Answer:** We recognise that the HEDNA and census data highlights a growing population of over-65s within the district. This is not surprising and reflects a general trend nationally. It is vital, therefore, that adequate provision is made for specialist older-persons accommodation of varying types, informed by evidence. This must be planned for and not left to windfalls. By properly planning for specialist accommodation in this way, there can be certainty that the need can be met in a sustainable manner, focusing older persons accommodation within accessible locations, as is necessary. The Local Plan can ensure that the Tier 1 settlements provide an appropriate share within the 20-Minute Neighbourhood Areas.

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

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

- 2.5.4 **Multiple Choice Answer:** Yes.

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

- 2.5.5 **Multiple Choice Answer:** No.

HOU4a. Please explain your answer.

2.5.6 **Answer:** Many local planning authorities look to implement blanket percentage policies for the provision of adaptable housing on development sites, as an easy way to have certainty that an overall need can be met. However, this is not often justified by reference to evidence of need in terms of type of requirements and specific nature of need. Moreover, not all sites will be suitable for adaptable housing given site characteristics, for example levels, and this policy should therefore ensure that adaptable housing is looked at on a site-by-site basis, due to the huge variability between sites.

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2.5.11 Nevertheless, in certain circumstances developers may look to over-provide affordable housing, above the policy level, where viability supports it and to deliver a specific need. The policy therefore needs to be flexible and should avoid setting a maximum provision of affordable housing.

## 2.6 Infrastructure

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

- *Transport.*

- *Health.*
- *Schools, Colleges.*
- *Community facilities.*
- *Sport.*
- *Green spaces.*
- *Energy supplies and water.*
- *Internet and mobile phone reception.*

2.6.1 **Multiple-Choice Answer:** All of the above

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

2.6.2 **Multiple-Choice Answer:** Neutral

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.*

2.6.3 **Multiple-Choice Answer:** Large sites

INF3a. Please explain your answer.

2.6.4 **Answer:** The Major Development Sites consultation process revealed that there are a number of potential large scale development sites across the district. Whilst EHDC has ultimately decided to abandon that approach (which did not seek to allocate an MDS within Liphook) it must be acknowledged that medium and large sized sites provide opportunities to provide infrastructure in an integrated way as part of sustainable new communities. The availability of land to the South East of Liphook provides an excellent opportunity to provide a range of infrastructure requirements, within the 20-Minute Neighbourhood Area and integrated into a new sustainable community.

### 3 Conclusion

- 3.1.1 Countryside welcome the opportunity to participate in East Hampshire District Council 'EHDC' Local Plan (Regulation 18) consultation which closes on 16<sup>th</sup> January 2023. We note EHDC's request for representations to be non-site-specific, and our responses to the consultation have been formulated accordingly.
- 3.1.2 These representations have been prepared following a thorough review of the consultation document and the relevant Background Papers. Whilst it is unfortunate that the previous emerging Local Plan was abandoned, it is positive that EHDC are now looking to positively plan.
- 3.1.3 We note many positive aspects of the consultation document which has the potential to lead to a justified and sound Local Plan. In particular, we support the recognition that Liphook should sit at the top of the settlement hierarchy as a Tier 1 settlement, and we welcome the intention to adopt the 20-Minute Neighbourhood principles in so far as they apply to Liphook.
- 3.1.4 It is clear that there is a chronic housing need across the south of England, and notably in Hampshire where many authorities have struggled to get Local Plans in place and cannot meet their housing supply or delivery requirements. It is therefore vital that EHDC positively prepares a Local Plan which meets the local housing need in full and accommodates unmet needs from neighbouring authorities.
- 3.1.5 Whilst we have avoided any site specific representations, a review of this Local Plan, the background papers and the previous Major Development Sites consultation process leads to a clear conclusion that Liphook must accommodate a significant proportion of the district's housing need. It is a highly sustainable location, reflected in its position at the top of the settlement hierarchy, and has a large amount of available and suitable land to the south east of the settlement which should be allocated for housing and infrastructure provision.
- 3.1.6 Given the non-site-specific nature of these representations, we wish to reserve our right to comment on subsequent iterations of the emerging Local Plan, and we also wish to meet with officers at the earliest opportunity to discuss the availability of residential development land in Liphook.

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

By email only to [localplan@easthants.gov.uk](mailto:localplan@easthants.gov.uk)

16<sup>th</sup> January 2023

Dear Sirs

### **East Hampshire Local Plan 2021-2040: Issues and Priorities Regulation 18 Part 1 consultation**

#### **Representations on behalf of Land north of Fullers Road, Holt Pound – LAA BIN-005**

On behalf of Land north of Fullers Road, Holt Pound (“BIN-005”), Falcon Developments (SE) Ltd (“Falcon”) is pleased to have the opportunity to respond to the East Hampshire District Council (“EHDC”) Local Plan 2021-2040: Issues and Priorities Regulation 18 Part 1 consultation on those questions relevant to BIN-005.

BIN-005 has been promoted for development classes C3 residential, or C2 extra care by Falcon since the EHDC Local Plan (Reg 18) consultation in 2019. Detailed design work, technical studies and DAS engagement with Natural England have been supplied to EHDC Policy Officers (“Policy”) as a robust and supportive evidence base for an allocation at the locality. Further Call for Sites submissions will be made prior to 31<sup>st</sup> March 2023 deadline.

The representations answer questions relevant to the promotion of BIN-005 and where left unanswered there are no specific comments to be made. Falcon draws particular attention to the inaccuracies of the Settlement Hierarchy 2022 and Community Facilities Study 2022 (*see response to CLIM6/6a*) that form part of the existing evidence base with regards to the settlement of Holt Pound.

As the Local Plan progresses, Falcon welcome continued engagement with Policy to promote growth a Holt Pound and the site at BIN-005 as a suitable locality for development allocation.

#### **Vision consultation questions – VIS1-3**

Falcon agrees with the Vision outlined; however, greater emphasis should be placed on ensuring that the right type, tenure, and diversity of homes are planned for within the Local Plan.

It is imperative that East Hampshire’s (“EHDC”) Local Plan not only delivers homes based on quantitative figure, but delivers a diversity of housing tenures, such as affordable, care, and self & custom build homes that respond to local housing need requirements.

## Climate Emergency consultation question

CLIM5/5a

Falcon agrees with the consultation that tackling climate change should be a key priority of the Local Plan in accordance with EHDC climate emergency. The requirement should be addressed through specific policies in the emerging Local Plan that outline achievable targets, methods of delivery and metrics that will help guide Design Codes across EHDC.

Falcon remains sceptical that Neighbourhood Plans have the correct resources to competently address this considerable and challenging issue and would propose that this is strategically planned for at a district level.

CLIM6/6a

As part of addressing climate change, Falcon recognises the requirement to improve accessibility through cycle, footpaths, and sustainable modes of transport. EHDC is geographically widespread and therefore will require the use of private cars to allow movement of the population to services, amenities, and facilities. Falcon supports growth focused on the most sustainable locations and agree with the principle of the 'living locally' agenda when allocating new homes.

The Settlement Hierarchy 2022 provides an updated review of the existing settlements and the introduction of the 20-minute neighbourhood. Holt Pound ranks 11<sup>th</sup> (with Bramshott & Medstead) within the hierarchy based on the review in *Appendix D: Scoring of East Hampshire Settlements*.

Falcon object to the content of the Settlement Hierarchy, as inaccurate and not representative of Holt Pound with several key services, facilities and amenities not accounted for in the scoring system. The below table (*Fig 1*) and visual map (*Fig 2*) have been reviewed in accordance with 20-minute neighbourhood aims, to include all services that are located within Holt Pound. These additional services are within EHDC boundaries and do not include South Downs National Park, or the services within 400m of the connecting village of Rowledge (Waverley).

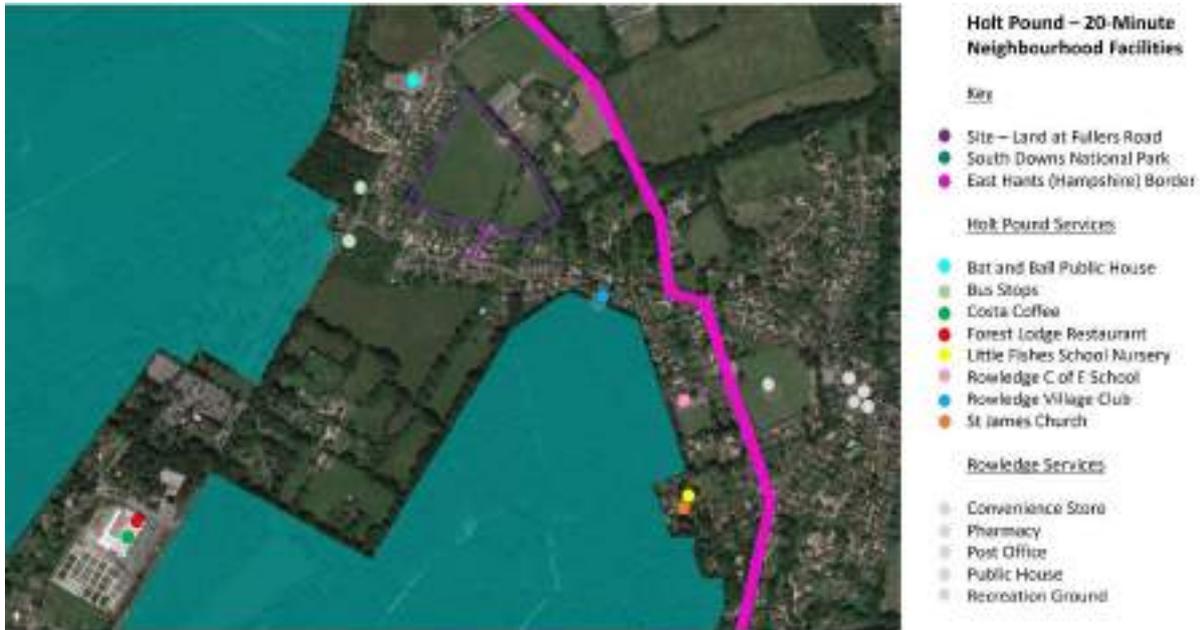
The criteria outlined using the Appendix D matrix, evidence that a score of at least 7, if not 9, should be attributed to Holt Pound moving the settlement up to 7<sup>th</sup> in the ranking with Holybourne. This immediately reflects an increase in the sustainability of the location within the district for growth.

*Fig 1 - Falcon Scoring of East Hampshire Settlements (Holt Pound)*

SCORER	SERVICE	LOCATION	SCORE
APPENDIX D	Bus Stop	A325	2
APPENDIX D	Primary School	Rowledge C of E School	1
		<b>APPENDIX D SCORE</b>	<b>3</b>
FALCON	Public House	Ball & Wicket	1
FALCON	Community Centre	Rowledge Village Club	1
FALCON	Creche	Little Fishes Nursery School	1
FALCON	Place of Worship	St James's Church	1
		<b>FALCON SCORE</b>	<b>7</b>

ADDITIONAL	Restaurant	The Restaurant (Forest Lodge)	1
ADDITIONAL	Café	Costa Coffee (Forest Lodge)	1
		<b>MAXIMUM SCORE</b>	<b>9</b>

Fig 2. Holt Pound – 20-minute neighbourhood facilities map



The evidence base, including the Settlement Hierarchy and Community Facility Study must be correctly updated to reflect the additional services not included by Policy and the enhanced position of Holt Pound within the settlement hierarchy of EHDC.

Allocation of housing at BIN-005 would support the Local Plan’s “living locally” with sufficient services within Holt Pound (as outlined above) to support sustainable growth and the distribution of development throughout the settlement.

**Population and Housing consultation question**

*POP1/1a*

The findings of the HEDNA 2022 identify an increasing affordability ratio of 14.51, and an unmet affordable housing need of 613 homes per annum. Falcon supports the standard method as the minimum housing target to be implemented by EHDC within the Local Plan.

To improve affordability, a greater number of homes is required to be delivered across the plan period. It would be anticipated that due to political disagreements amongst existing residents, politicians and Policy, a scenario whereby EHDC explore exceptional circumstances would only look to reduce the housing delivery target rather than enhance them to meet existing affordable unmet need.

Any deviation from the standard method would detrimentally impact the affordability across EHDC.

### *POP2/2a/3/3a*

EHDC is constrained by a large part of the district falling within South Downs, however, there are sufficient sustainable locations form Tier 1 -3 across the district that can meet all existing and future housing numbers required by the standard method calculation of 517 new homes per year.

As outlined in the Issues & Priorities, there is no strong argument to move away from seeking agreement with SDNPA to meet 115 homes per year of EHDC housing requirement.

Falcon identifies Holt Pound as a suitable location for growth housing allocation within the Local Plan to accommodate the identified housing requirements of EHDC, notwithstanding the housing figures to be attributed to South Downs National Park.

### **Types of Housing consultation question**

#### *HOU1/1a/2*

Falcon supports the inclusion of a specific policy on older persons accommodation, as a growing demographic across the district.

In line with the Vision of the Local Plan, and the growing trend of increases to older persons population projection up to 2038, the Local Plan's annual targets should be positively prepared to accommodate suitable tenures of housing for the elderly.

A specific policy for older persons accommodation should be included within the emerging Local Plan. The scope of older persons accommodation should consider a broad range of care categories that need to be delivered and should be reviewed on a regular basis to consider changes in demographics, housing need and localities for deliverability.

With an emphasis on "living locally" the plan should recognise (and encourage) that not all development can occur within existing settlement boundaries, and therefore edge of settlement locations within the hierarchy could satisfactorily deliver these types of schemes to address housing need. Whilst the existing Core Strategy Policy CP12 is already in place, the emerging Local Plan should look to strengthen the policy based on housing need and sustainable locations for development.

Within these representations, Holt Pound has been identified as the most sustainable Tier 3 settlement and would therefore be an appropriate location to deliver older persons accommodation, as outlined below.

- Strategically located in the 'North West' spatial area of EHDC and assist in meeting needs within this section of the district.
- Existing character and infrastructure network will accommodate additional growth.
- Sustainably located with nearby facilities in Holt Pound & Rowledge within the 20-minute neighbourhood criteria.
- Well connected to alternative methods of transport through the A325 bus service and the nearby train stations in Bentley and Farnham.
- An identified need for older persons housing in the locality based on an ageing population, demographics, and a lack of existing care provision.
- Exceptional local pathway network that provides walking routes and links into nearby recreation facilities, such as Alice Holt and Holt Park enclosure.

Falcon Developments, working alongside C Squared Property Developments (C2PD) have identified a need for extra care tenure provision in the 'northwest' part of the district, whereby a Retirement Village could be allocated within the Local Plan at BIN-005 for 'extra care' housing. Previous Call for Sites submission have been submitted to Policy for older persons use and separate representations are also being made by C2PD to this effect.

In collaboration with C2PD, Falcon welcomes the opportunity to assist Policy with preparing an older person's accommodation policy and confirming the availability of BIN-005 for allocation of an extra care retirement village.

#### *HOU7/7a*

Falcon supports the continued affordable housing threshold of 40% for the delivery for qualifying schemes to assist with meeting the HEDNA total identified need for 613 affordable homes across the district a year. The continued percentage would ensure that a range of affordable housing tenures are delivered to meet the existing demand with the aim of improving affordability across the district.

However, Falcon only supports the requirement for affordable delivery for schemes that are delivering class C3 residential housing. Class C2 institutions, regardless of whether they are self-contained units or bedspaces should be treated independently from this policy with the removal of any requirement to deliver affordable housing.

Additional wording should be included with regards to self-custom build developments when considering the affordable tenure mix (with the inclusion of First Homes) on a case by case, or allocation policy basis.

#### *HOU8/8a*

The Local Plan consultation does not make any reference to the delivery of 'exception' sites, whether they be 'entry level exception' sites, 'rural exception' sites, or 'first homes' exception sites.

An exception sites policy, in line with the National Planning Policy Framework should be included within the Plan, to account for shortfalls in affordable housing delivery and identified housing need. As highlighted in the HEDNA, the identified housing need in EHDC is 613 homes per annum, against a target of 632 homes, of which only 40% (253 homes) are planned to be affordable.

On the evidence of the HEDNA against Local Plan housing targets, affordable need is likely to increase year on year, with EHDC affordability ratio increasing and making the district less affordable for residents.

Exception sites that accord with national policy and can demonstrate, both local and borough wide housing need, should be supported within the emerging Local Plan with a specific policy and justified through the increasing unaffordability of the district.

A policy of this nature would support the delivery of housing across the whole spatial strategy in line with Option 1 and allow families to remain in the locality they grew up in, rather than moving to more urban (and often affordable) locations.

Self-build and custom-build (SCB) homes should be a housing policy in its own entirety, much as older persons accommodation in HOU1.

The Right to Build Registers Monitoring 2016-2021 report identifies a growing need and lack of delivery with the administration area of serviced plots for self and custom build homes. In the 2020-2021 period only 19 plots were consented against 124 registrants from base periods 1-6.

The EHDC Authority Monitoring Report 2020-21 also identifies a total number of individuals on the Right to Build register as of March 2021 being 102 registrants, against a CIL exemption delivery of 19 plots.

The Local Plan has an opportunity to proactively address future under delivery and shortfall through the specific allocation of self-custom build developments, or a supportive policy to bring forward schemes where a local need has been evidenced.

Falcon proposes a policy that individually supports this tenure of housing, rather than enforcing a percentage of schemes over a certain size to provide SCB plots 'on site'. This would offer prospective purchasers the opportunity to live in settlements across the district in line with Option 1 and Option 3 of the Development Strategy and deliver against unmet housing need.

### **Development Strategy consultation question**

#### *DEV1*

Falcon supports Option 1 as the optimal solution for distributing new development across a variety of settlements based on the revised (and to be updated as evidenced in these representations) Settlement Hierarchy.

Option 1 is consistent with the "living locally" objectives set out within this consultation and ensures that suitable levels of development are met within communities across the district. Not only would this encourage small-mid scale schemes, but it would also support the delivery of housing by SME Developers and increase competition in the sector to deliver high-quality bespoke schemes.

The Joint Core Strategy (JCS) 2016 predominantly focused on housing being allocated in the largest settlements, and the emerging Local Plan provides an opportunity to reduce the impact on these Tier 1 settlements through the selection of Option 1. Allocation of housing in Tier 3 settlements (such as Holt Pound) that would encourage alternative methods of transport, through bus networks, train lines and cycling routes, would facilitate a more appropriate spatial distribution of housing across the settlements.

Should Option 1 not be selected as the preferred distribution of housing in the emerging Local Plan, then Option 3 would be the most appropriate solution through providing a relative increase of housing in each spatial area. As part of the North West sector, Holt Pound would be able to accommodate part of this growth.

Option 2 would be a continuation of the JCS and impact the ability to balance the housing delivery across the district to a wide variety of settlements. Falcon is of the view that this would further hinder the ability for local residents to remain within Tier 2 & Tier 3 settlements and fail to deliver against the living locally objective. This Option is not supported.

Option 4 would be the least supported method of housing delivery in the district and should not be considered. Over the last 4 years, two separate options for a new settlement at 'Northbrook Farm'

and ‘Chawton Park Farm’ have been consulted on and faced severe levels of objection from residents across the district and statutory consultees. The isolated nature of these schemes are not viable or desirable and this Option is also not supported.

For clarity Falcon rank the options in order of preference below, with 1 being the highest preference.

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

Holt Pound is identified as a Tier 3 (small) settlement within the proposed hierarchy, which is an agreed position by Falcon, however, as has been outlined in the representations Holt Pound has been evidenced to be the most sustainable location within Tier 3 alongside Holybourne. The evidence base needs updating considering this evidence to correct rank the locality within EHDC Settlement Hierarchy.

The settlements’ sustainable location, unconstrained nature, surrounding characteristics and the recent Appeal decision allowing 10 houses on existing allocation Policy VL5, identify Holt Pound as a suitable location for growth in accordance with Option 1. With strong transport connections to bus stops along A325 serving Farnham, Bordon and Alton, as well as a mainline station 3-miles away in Farnham, Holt Pound would support the living locally agenda. Additional alternative methods of transport are accessible to minimise personal car travel and reduce emissions in line with climate emergency initiatives.

Whilst Falcon recognises that the consultation does not look to allocate specific development opportunities in the settlements, the re-evaluation of the scoring of Holt Pound within the Settlement Hierarchy identifies that Policy should look to allocate development within the locality.

BIN-005 has been demonstrated as a suitable and deliverable site for development and Falcon welcome the opportunity to continue engaging with Policy through the Local Plan process to provide the supportive evidence base for allocation on this site.

## Summary

Falcon remains committed to working closely with Policy on the emerging Local Plan and support Option 1 spatial strategy for delivery of housing throughout the district. Holt Pound has been evidenced as a suitable location for growth and we reconfirm the availability of BIN-005 as a site suitable for allocation.

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

By email only to [localplan@easthants.gov.uk](mailto:localplan@easthants.gov.uk)

16<sup>th</sup> January 2023

Dear Sirs

### **East Hampshire Local Plan 2021-2040; Issues and Priorities Regulation 18 Part 1 consultation**

#### **Representations on behalf of Land west of Manor Lodge Road, Rowlands Castle – LAA RC-008**

On behalf of Land west of Manor Lodge Road, Rowlands Castle (“RC-008”), Falcon Developments (SE) Ltd (“Falcon”) is pleased to have the opportunity to respond to the East Hampshire District Council (“EHDC”) Local Plan 2021-2040; Issues and Priorities Regulation 18 Part 1 consultation on those questions relevant to RC-008.

RC-008 has been promoted as an Entry Level Exception Site for affordable housing by Falcon and VIVID Homes since the EHDC Local Plan (Reg 18) consultation in 2019. A Planning application (ref 58024) for 14 x Affordable Homes was refused by Planning Committee in February 2022 and awaits a decision by the Planning Inspectorate - Appeal ref 3300340. The application provides a robust and supportive evidence base for an allocation within Rowlands Castle and a further Call for Sites submissions will be made prior to 31<sup>st</sup> March 2023 deadline.

The representations answer questions relevant to the promotion of RC-008 and where left unanswered there are no specific comments to be made. As the Local Plan progresses, Falcon welcome continued engagement with Policy to promote the site at RC-008 as a suitable locality for the allocation of housing to meet local needs.

#### **Vision consultation questions – VIS1-3**

Falcon agrees with the Vision outlined; however, greater emphasis should be placed on ensuring that the right type, tenure, and diversity of homes are planned for within the Local Plan.

It is imperative that East Hampshire’s (“EHDC”) Local Plan not only delivers homes based on quantitative figure, but delivers a diversity of housing tenures, such as affordable, care, and self & custom build homes that respond to local housing need requirements.

## **Climate Emergency consultation question**

### *CLIM5/5a*

Falcon agrees with the consultation that tackling climate change should be a key priority of the Local Plan in accordance with EHDC climate emergency. The requirement should be addressed through specific policies in the emerging Local Plan that outline achievable targets, methods of delivery and metrics that will help guide Design Codes across EHDC.

Falcon remains sceptical that Neighbourhood Plans have the correct resources to competently address this considerable and challenging issue and would propose that this is strategically planned for at a district level.

### *CLIM6/6a*

As part of addressing climate change, Falcon recognises the requirement to improve accessibility through cycle, footpaths and sustainable modes of transport. EHDC is geographically widespread and therefore will require the use of private cars to allow movement of the population to services, amenities, and facilities. Falcon supports growth focused on the most sustainable locations and agree with the principle of the 'living locally' agenda when allocating new homes.

The Settlement Hierarchy 2022 provides an updated review of the existing settlements and the introduction of the 20-minute neighbourhood. Rowlands Castle is ranked as 8<sup>th</sup> within the hierarchy based on the review in *Appendix D: Scoring of East Hampshire Settlements*.

The Tier 3 settlement of Rowlands Castle would support some development within the Local Plan and accord with the "living locally" objective, with sufficient services to support sustainable growth and the distribution of development throughout EHDC. Land at RC-008 would fall within the 1200m distance of the village centre, as well as being closely located to St Johns Primary School and therefore accord with the 20-minute neighbourhood.

## **Population and Housing consultation question**

### *POP1/1a*

The findings of the HEDNA 2022 identify an increasing affordability ratio of 14.51, and an unmet affordable housing need of 613 homes per annum. Falcon supports the standard method as the minimum housing target to be implemented by EHDC within the Local Plan.

To improve affordability, a greater number of homes is required to be delivered across the plan period. It would be anticipated that due to political disagreements amongst existing residents, politicians and Policy, a scenario whereby EHDC explore exceptional circumstances would only look to reduce the housing delivery target rather than enhance them to meet existing affordable unmet need.

Any deviation from the standard method would detrimentally impact the affordability across EHDC.

### *POP2/2a/3/3a*

EHDC is constrained by a large part of the district falling within South Downs, however, there are sufficient sustainable locations form Tier 1 -3 across the district that can meet all existing and future housing numbers required by the standard method calculation of 517 new homes per year.

As outlined in the Issues & Priorities, there is no strong argument to move away from seeking agreement with SDNPA to meet 115 homes per year of EHDC housing requirement.

Falcon identifies Rowlands Castle as a suitable location for growth housing allocation within the Local Plan to accommodate the identified housing requirements of EHDC, notwithstanding the housing figures to be attributed to South Downs National Park.

### **Types of Housing consultation question**

#### *HOU7/7a*

Falcon supports the continued affordable housing threshold of 40% for the delivery for qualifying schemes to assist with meeting the HEDNA total identified need for 613 affordable homes across the district a year. The continued percentage would ensure that a range of affordable housing tenures are delivered to meet the existing demand with the aim of improving affordability across the district.

However, Falcon only supports the requirement for affordable delivery for schemes that are delivering class C3 residential housing. Class C2 institutions, regardless of whether they are self-contained units or bedspaces should be treated independently from this policy with the removal of any requirement to deliver affordable housing.

Additional wording should be included with regards to self-custom build developments when considering the affordable tenure mix (with the inclusion of First Homes) on a case by case, or allocation policy basis.

#### *HOU8/8a*

The Local Plan consultation does not make any reference to the delivery of 'exception' sites, whether they be 'entry level exception' sites, 'rural exception' sites, or 'first homes' exception sites.

An exception sites policy, in line with the National Planning Policy Framework should be included within the Plan, to account for shortfalls in affordable housing delivery and identified housing need. As highlighted in the HEDNA, the identified housing need in EHDC is 613 homes per annum, against a target of 632 homes, of which only 40% (253 homes) are planned to be affordable.

On the evidence of the HEDNA against Local Plan housing targets, affordable need is likely to increase year on year, with EHDC affordability ratio increasing and making the district less affordable for residents.

Exception sites that accord with national policy and can demonstrate, both local and borough wide housing need, should be supported within the emerging Local Plan with a specific policy and justified through the increasing unaffordability of the district.

A policy of this nature would support the delivery of housing across the whole spatial strategy in line with Option 1 and allow families to remain in the locality they grew up in, rather than moving to more urban (and often affordable) locations.

Self-build and custom-build (SCB) homes should be a housing policy in its own entirety, much as older persons accommodation in HOU1.

The Right to Build Registers Monitoring 2016-2021 report identifies a growing need and lack of delivery with the administration area of serviced plots for self and custom build homes. In the 2020-2021 period only 19 plots were consented against 124 registrants from base periods 1-6.

The EHDC Authority Monitoring Report 2020-21 also identifies a total number of individuals on the Right to Build register as of March 2021 being 102 registrants, against a CIL exemption delivery of 19 plots.

The Local Plan has an opportunity to proactively address future under delivery and shortfall through the specific allocation of self-custom build developments, or a supportive policy to bring forward schemes where a local need has been evidenced.

Falcon proposes a policy that individually supports this tenure of housing, rather than enforcing a percentage of schemes over a certain size to provide SCB plots 'on site'. This would offer prospective purchasers the opportunity to live in settlements across the district in line with Option 1 and Option 3 of the Development Strategy and deliver against unmet housing need.

### **Development Strategy consultation question**

#### *DEV1*

Falcon supports Option 1 as the optimal solution for distributing new development across a variety of settlements based on the revised (and to be updated as evidenced in these representations) Settlement Hierarchy.

Option 1 is consistent with the "living locally" objectives set out within this consultation and ensures that suitable levels of development are met within communities across the district. Not only would this encourage small-mid scale schemes, but it would also support the delivery of housing by SME Developers and increase competition in the sector to deliver high-quality bespoke schemes.

The Joint Core Strategy (JCS) 2016 predominantly focused on housing being allocated in the largest settlements, and the emerging Local Plan provides an opportunity to reduce the impact on these settlements through the selection of Option 1. Allocation of housing in sustainable Tier 3 settlements (such as Rowlands Castle) that would encourage alternative methods of transport, through bus networks, train lines and cycling routes, would facilitate a more appropriate spatial distribution of housing across the settlements.

On this basis, were Option 1 not selected as the preferred distribution of housing in the emerging Local Plan, then Option 3 would be the most appropriate solution through providing a relative increase of housing in each spatial area. As part of the Southern sector, Rowlands Castle would be able to accommodate part of this growth.

Option 2 would be a continuation of the JCS and impact the ability to balance the housing delivery across the district to a wide variety of settlements. Falcon is of the view that this would further hinder the ability for local residents to remain within Tier 2 & Tier 3 settlements and fail to deliver against the living locally objective. This Option is not supported.

Option 4 would be the least supported method of housing delivery in the district and should not be considered. Over the last 4 years, two separate options for a new settlement at ‘Northbrook Farm’ and ‘Chawton Park Farm’ have been consulted on and faced severe levels of objection from residents across the district and statutory consultees. The isolated nature of these schemes are not viable or desirable and this Option is also not supported.

For clarity Falcon rank the options in order of preference below, with 1 being the highest preference.

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

Rowlands Castle is identified as a one of the most sustainable Tier 3 (small) settlements within the proposed hierarchy, which is an agreed position by Falcon.

The settlements’ sustainable location, train station, bus services and shopping facilities, evidence Rowlands Castle as a suitable location for growth in accordance with Option 1.

Whilst Falcon recognises that the consultation does not look to allocate specific development opportunities in the settlements, Falcon welcomes the opportunity to continue engaging with Policy through the Local Plan process to provide the supportive evidence base for allocation of RC-008 to address local housing need.

### Summary

Falcon remains committed to working closely with Policy on the emerging Local Plan and support Option 1 spatial strategy for delivery of housing throughout the district. Rowlands Castle is evidenced as a suitable location for growth, and we reconfirm the availability of RC-008 as a site suitable for allocation.

Planning Policy  
East Hampshire District Council  
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GU31 4EX

By email only to [localplan@easthants.gov.uk](mailto:localplan@easthants.gov.uk)

16<sup>th</sup> January 2023

Dear Sirs

### **East Hampshire Local Plan 2021-2040; Issues and Priorities Regulation 18 Part 1 consultation**

#### **Representations on behalf of Land rear of 7-15 & 23-33 Blackberry Lane, Four Marks – LAA FM-011**

On behalf of Land rear of 7-15 & 23-33 Blackberry Lane, Four Marks ("FM-011"), Falcon Developments (SE) Ltd ("Falcon") is pleased to have the opportunity to respond to the East Hampshire District Council ("EHDC") Local Plan 2021-2040; Issues and Priorities Regulation 18 Part 1 consultation on those questions relevant to FM-011.

Falcon has promoted the landholding at FM-011 since the EHDC Local Plan (Reg 18) consultation in 2019. Throughout the process, EHDC Policy Officers ("Policy") have been provided with various layout & design work, technical reports, and Call for Sites submissions to support the allocation and delivery of residential housing at the site.

FM-011 has also been promoted in conjunction with the Large Development Site consultation in 2019 as part of the 'Four Marks South' ("FMS") consortium. The most recent masterplan was submitted to Policy in March 2022 and presented to Policy and Parish Councils in June 2022. FMS now consists of a consortium promoting 40.79 hectares (100.80 acres) of comprehensive land for multiple use classes of development.

The consortium has actively promoted FMS with Policy, providing design, capacity and technical studies that evidence the unconstrained nature and deliverability of development at this location. The comprehensive development proposal at FMS provides a natural extension to the existing Four Marks settlement boundary, whilst having sufficient capacity to deliver infrastructure and facility upgrades within the Parish.

The representations only respond to questions relevant to FM-011 as part of this consultation and should be read in conjunction with the site's promotional work by Falcon. Falcon welcomes the continued engagement with Policy regarding the suitability of FM-011 for allocation within the Local Plan, either as a standalone development, or as part of a wider allocation in the large development site promotion at FMS.

**FALCON DEVELOPMENTS (SE) LIMITED - Registration No. 10896998**

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### **Vision consultation questions – VIS1-3**

Falcon agrees with the Vision outlined; however, greater emphasis should be placed on ensuring that the right type, tenure, and diversity of homes are planned for within the Local Plan.

It is imperative that East Hampshire's ("EHDC") Local Plan not only delivers homes based on quantitative figure, but delivers a diversity of housing tenures, such as affordable, care, and self & custom build homes that respond to local housing need requirements.

### **Climate Emergency consultation question**

#### *CLIM5/5a*

Falcon agrees with the consultation that tackling climate change should be a key priority of the Local Plan in accordance with EHDC climate emergency. The requirement should be addressed through specific policies in the emerging Local Plan that outline achievable targets, methods of delivery and metrics that will help guide Design Codes across EHDC.

Falcon remains sceptical that Neighbourhood Plans have the correct resources to competently address this considerable and challenging issue and would propose that this is strategically planned for at a district level.

#### *CLIM6/6a*

As part of addressing climate change, Falcon recognises the requirement to improve accessibility through cycle, footpaths, and sustainable modes of transport. EHDC is geographically widespread and therefore will require the use of private cars to allow movement of the population to services, amenities, and facilities. Falcon supports growth focused on the most sustainable locations and agree with the principle of the 'living locally' agenda when allocating new homes.

The new Settlement Hierarchy 2022 provides an updated review of the settlement hierarchy and the introduction of the 20-minute neighbourhood from the Four Marks Local Centre. Four Marks & South Medstead ("Four Marks") is correctly identified as a Tier 2 settlement in the hierarchy and is considered to be the least physically constrained Tier 2 location for future development. This is evidenced by the supportive Policy reviews and availability of landholdings within Four Marks as part of the Land Availability Assessment ("LAA"), when compared to alternative Tier 2 settlements, which also have immediate constraints to expansion, as listed below.

- Clanfield is surrounded by the South Downs National Park and is an area restricted by nitrate neutrality.
- Horndean has high levels of known sinkholes in the area and restricted by nitrate neutrality.
- Grayshott is limited for development due to the adjacent proximity of the special protection area.

Falcon proposes that allocating housing within Four Marks, would support the Local Plan's "living locally" objective, delivering sustainable levels of growth that could enhance the vibrancy of the settlement.

The landholding at FM-011 falls partly within the 400m buffer and completely within the 800m buffer of the 20-minute neighbourhood. The locality offers EHDC a highly sustainable location for future development that would accord with reasonable walking distances and remove the need for travel by car to local services, according with EHDC climate emergency objectives.

### **Population and Housing consultation question**

#### *POP1/1a*

The findings of the HEDNA 2022 identify an increasing affordability ratio of 14.51, and an unmet affordable housing need of 613 homes per annum. Falcon supports the standard method as the minimum housing target to be implemented by EHDC within the Local Plan.

To improve affordability, a greater number of homes is required to be delivered across the plan period. It would be anticipated that due to political disagreements amongst existing residents, politicians and Policy, a scenario whereby EHDC explore exceptional circumstances would only look to reduce the housing delivery target rather than enhance them to meet existing affordable unmet need.

Any deviation from the standard method would detrimentally impact the affordability across EHDC.

#### *POP2/2a*

EHDC is constrained by a large part of the district falling within South Downs, however, there are sufficient sustainable locations form Tier 1 -3 across the district that can meet all existing and future housing numbers required by the standard method calculation of 517 new homes per year.

As outlined in the Issues & Priorities, there is no strong argument to move away from seeking agreement with SDNPA to meet 115 homes per year of EHDC housing requirement.

Falcon identifies Four Marks as a suitable location for growth housing allocation within the Local Plan to accommodate the identified housing requirements of EHDC, notwithstanding the housing figures to be attributed to South Downs National Park.

### **Types of Housing consultation question**

#### *HOU1/1a/2*

Falcon supports the inclusion of a specific policy on older persons accommodation, as a growing demographic across the district.

In line with the Vision of the Local Plan, and the growing trend of increases to older persons population projection up to 2038, the Local Plan's annual targets should be positively prepared to accommodate suitable tenures of housing for the elderly.

A specific policy for older persons accommodation should be included within the emerging Local Plan. The scope of older persons accommodation should consider a broad range of care categories that need to be delivered and should be reviewed on a regular basis to consider changes in demographics, housing need and localities for deliverability.

With an emphasis on “living locally” the plan should recognise (and encourage) that not all development can occur within existing settlement boundaries, and therefore edge of settlement locations within the hierarchy could satisfactorily deliver these types of schemes to address housing need. Whilst the existing Core Strategy Policy CP12 is already in place, the emerging Local Plan should look to strengthen the policy based on housing need and sustainable locations for development.

Four Marks, as a Tier 2 settlement contains demographics of an ageing population. The locality would be a suitable position for older persons accommodation, and this could be incorporated into any future allocation at FMS, to accord with the living locally objectives of the Local Plan.

#### *HOU7/7a*

Falcon supports the continued affordable housing threshold of 40% for the delivery for qualifying schemes to assist with meeting the HEDNA total identified need for 613 affordable homes across the district a year. The continued percentage would ensure that a range of affordable housing tenures are delivered to meet the existing demand with the aim of improving affordability across the district.

However, Falcon only supports the requirement for affordable delivery for schemes that are delivering class C3 residential housing. Class C2 institutions, regardless of whether they are self-contained units or bedspaces should be treated independently from this policy with the removal of any requirement to deliver affordable housing.

Additional wording should be included with regards to self-custom build developments when considering the affordable tenure mix (with the inclusion of First Homes) on a case by case, or allocation policy basis.

#### *HOU8/8a*

The Local Plan consultation does not make any reference to the delivery of ‘exception’ sites, whether they be ‘entry level exception’ sites, ‘rural exception’ sites, or ‘first homes’ exception sites.

An exception sites policy, in line with the National Planning Policy Framework should be included within the Plan, to account for shortfalls in affordable housing delivery and identified housing need. As highlighted in the HEDNA, the identified housing need in EHDC is 613 homes per annum, against a target of 632 homes, of which only 40% (253 homes) are planned to be affordable.

On the evidence of the HEDNA against Local Plan housing targets, affordable need is likely to increase year on year, with EHDC affordability ratio increasing and making the district less affordable for residents.

Exception sites that accord with national policy and can demonstrate, both local and borough wide housing need, should be supported within the emerging Local Plan with a specific policy and justified through the increasing unaffordability of the district.

A policy of this nature would support the delivery of housing across the whole spatial strategy in line with Option 1 and allow families to remain in the locality they grew up in, rather than moving to more urban (and often affordable) locations.

Self-build and custom-build (SCB) homes should be a housing policy in its own entirety, much as older persons accommodation in HOU1.

The Right to Build Registers Monitoring 2016-2021 report identifies a growing need and lack of delivery with the administration area of serviced plots for self and custom build homes. In the 2020-2021 period only 19 plots were consented against 124 registrants from base periods 1-6.

The EHDC Authority Monitoring Report 2020-21 also identifies a total number of individuals on the Right to Build register as of March 2021 being 102 registrants, against a CIL exemption delivery of 19 plots.

The Local Plan has an opportunity to proactively address future under delivery and shortfall through the specific allocation of self-custom build developments, or a supportive policy to bring forward schemes where a local need has been evidenced.

Falcon proposes a policy that individually supports this tenure of housing, rather than enforcing a percentage of schemes over a certain size to provide SCB plots 'on site'. This would offer prospective purchasers the opportunity to live in settlements across the district in line with Option 1 and Option 3 of the Development Strategy and deliver against unmet housing need.

### **Development Strategy consultation question**

#### *DEV1*

Falcon supports Option 1 as the optimal solution for distributing new development across a variety of settlements, closely following by Option 3, which would distribute development by population.

Option 1 is consistent with "living locally" objectives set out within this consultation and ensures that suitable levels of development are met within communities across the district. Not only would this encourage small-mid scale developments, but it would also support the delivery of housing by SME Developers and increase competition in the sector to deliver high-quality bespoke schemes.

The Joint Core Strategy (JCS) 2016 predominantly focused on housing being allocated in the largest settlements, and the emerging Local Plan provides an opportunity to reduce the impact on these settlements through the selection of Option 1. Allocation of housing in Tier 2 and appropriate Tier 3 settlements within the emerging Local Plan would facilitate a more appropriate spatial distribution of housing across the district. This would remove the pressure off Tier 1 settlements that have historically been allocated the majority of the annual housing figures.

Should Option 1 not be selected as the preferred distribution of housing in the emerging Local Plan, then Option 3 would be the most appropriate solution through providing a relative increase of housing in each spatial area. As part of the North West sector, Four Marks would be able to accommodate a considerable amount of this growth.

Option 2 would be a continuation of the JCS and impact the ability to balance the housing delivery across the district to a wide variety of settlements. Falcon is of the view that this would further hinder the ability for local residents to remain within Tier 2 & Tier 3 settlements and fail to deliver against the living locally objective. This Option is not supported.

Option 4 would be the least supported method of housing delivery in the district and should not be considered. Over the last 4 years, two separate options for a new settlement at ‘Northbrook Farm’ and ‘Chawton Park Farm’ have been consulted on and faced severe levels of objection from residents across the district and statutory consultees. The isolated nature of these schemes are not viable or desirable and this Option is also not supported.

For clarity Falcon rank the options in order of preference below, with 1 being the highest preference.

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

Four Marks is the least physically constrained Tier 2 settlement, and is situated in the North West of the district accounting for 37% of the population. Large-scale allocation of housing within the 20-minute neighbourhood area of Four Marks, would accord with the living locally objective and allow for necessary infrastructure upgrades to improve the vitality of the village for existing residents.

Whilst Falcon recognises this consultation does not look to allocate specific sites, FM-011 has been demonstrated as a suitable and deliverable site for development. Falcon welcomes the opportunity to continue engaging with Policy through the Local Plan process to provide the supportive evidence base for allocation on this site.

A large development site at FMS would also be suitable for allocation and able to deliver development of various tenures to address local needs, as well as provide the funding for infrastructure upgrades, new amenities and desired facilities.

### *DEV3*

Falcon proposes that an alternative option should be considered by Policy as part of the emerging Local Plan, to deliver a ‘strategic development masterplan’ of Four Marks & South Medstead.

Four Marks, as the least constrained Tier 2 development, is physically unconstrained and would be suitable for significant, but strategically planned levels of expansion. Policy has the opportunity as part of the emerging Local Plan to strategically masterplan the settlement, in order to deliver housing, employment, infrastructure, facilities, and amenities over a structured period of time. Four Marks is the only location within EHDC where a masterplan of this nature would be deliverable, as evidenced by the availability of the large development sites.

The masterplan process would deliver a ‘plan led’ strategic development and allow for phasing as the scheme progresses. Funding would be secured through section 106 and CIL to improve transport links, increase available amenities and services, enhance sustainability, and provide more employment opportunities within the settlement.

It is envisaged that a masterplan of Four Marks would align with Option 1 of the spatial strategy. An allocation of this size would deliver part of the housing requirements of the North West sector of the district, whilst reducing the requirement for further large-scale allocations at Alton. The remaining housing requirements would be distributed across a variety of suitable Tier 1, 2 and 3 settlements within the emerging Local Plan period.

## **Summary**

Falcon remains committed to working closely with Policy on the emerging Local Plan and distribution of housing in line with Option 1, with the locality of Four Marks specifically suitable for large-scale additional growth.

The locality is viewed to be the most preferable Tier 2 settlement for growth, based on the evidence base of the LAA and due to the unconstrained nature of the area in comparison comparable settlements.

Falcon reconfirms the availability of FM-011 for allocation and development in the Local Plan, either as a standalone development that would enable further opportunities for growth within Four Marks, or as part of the large development site FMS.

# FREETHS

## EAST HAMPSHIRE LOCAL PLAN 2021- 2040 REGULATION 18 PART 1 CONSULTATION 2022

### REPRESENTATION ON BEHALF OF C SQUARED PROPERTY DEVELOPMENTS LTD

16<sup>th</sup> JANUARY 2023

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#### **Introduction**

1. We act on behalf of C Squared Property Developments Ltd (“C Squared”) and have been instructed to make the following representation to East Hampshire District Council (“EHDC”) in relation to the Regulation 18 Part 1 consultation.
2. C Squared is a specialist developer of retirement village with care schemes. C Squared has identified the settlement of Holt Pound as an appropriate location to meet a pressing need for specialist retirement living accommodation in this part of the district and the wider housing market. Initial discussions have been held with EHDC policy officers on the principle of development in this location. The intention is to bring forward a site for a planning application during this year which will first be the subject of pre-application discussion and community engagement. In the interim, C Squared welcomes the opportunity to participate in the formulation of the Local Plan.
3. The representation is structured to follow the questions in the consultation document. Where we have not responded to a specific question, C Squared has no specific comment to make at this stage or the question is not relevant to their interests.

#### **Representation**

##### ***Climate Emergency – Question CLIM5***

4. C Squared supports the importance and recognition given to the climate emergency in the emerging Plan. One specific area of interest to C Squared is the location of new development. The geographical nature of the district and its transport network is such that the use of the private car is often necessary to allow the local population to access certain forms of residential accommodation and services. C Squared supports the emphasis that has been placed in the Plan on “living locally” and how this should influence the settlement hierarchy and distribution of development. The concept of “living locally” to influence the location of new homes is also strongly supported.

##### ***Population and Housing – Question POP1***

5. C Squared supports the use of the identified housing need figure of 517 new homes per year for the Local Plan. The justification for this approach as explained in the Housing Needs and Requirements background paper offers appropriate justification for this decision. Accordingly, there are no strong reasons not to use this housing need figure.

# FREETHS

## ***Types of Housing Need – Questions HOU1 & 2***

6. C Squared welcomes the identification of an ageing population in the district and the importance of planning positively for this particular age group and their accommodation needs in the emerging Plan. The role and significance of this accommodation type together with an increasing shortfall of appropriate housing suitable for this age group is being increasingly recognised by national policy guidance and other initiatives.
7. It is notable that the district's ageing population is growing and will continue to do so throughout the Local Plan period. This is consistent with C Squared's identification of the district and specifically Holt Pound in the 'North West' part of the Plan area, as an appropriate location for its scheme.
8. There should be a specific policy for older persons accommodation in the Plan. As a starting point, this should refer to back to the evidence base and include a specific strategic target for the number of homes to be provided for older persons across the Plan period. This should include an identification of the differing accommodation and care categories that need to be supported in the delivery of new accommodation.
9. The older persons accommodation target should be identified simply as a 'target' and not be used as a cap. This will ensure that the Plan is positively prepared and sufficiently flexible throughout its lifetime to adapt to changing accommodation needs and requirements. The housing needs evidence provides a strategic overview of requirements in the district but does not disaggregate this down to specific sub-areas, towns and/or settlements. These are likely to have differing needs and requirements which can be presented as part of a planning application for a specific scheme. This can then demonstrate the settlement specific need and how bespoke requirements to that area have been reflected in the type of accommodation and other components set out in the proposed scheme.
10. Consistent with the "living locally" emphasis of the Plan, the policy approach should be to allow for older persons accommodation to be provided in and on the edge of locations in the settlement hierarchy, provided they are appropriate for the type of scheme and residents. Such an approach is already essentially in place under Core Strategy Policy CP12. A similar approach should be taken in this Plan to encourage this form of development to come forward and allow an applicant to demonstrate the suitability of their particular type of accommodation for a site location and specific settlement.
11. Holt Pound is an appropriate location to plan for older persons accommodation on the following basis:
  - There is a specific settlement specific need for this accommodation type in the local housing market. This is based on the ageing population in the local housing market and an absence of appropriate accommodation across the sector.
  - It is strategically positioned in the north-eastern corner of the district in a location where there are no other settlements in the district. It can therefore meet needs in a part of the district where there are no other choices for the local population. This will allow them to continue to live locally and in the district itself.

# FREETHS

- Positioning this form of specialist accommodation in Holt Pound will allow for family-sized homes in this part of the district's housing market to be freed up for younger families and other groups as residents move to suit their changing needs.
  - It contains an appropriate level of local services including those in the adjacent settlement of Rowledge, plus wider services in nearby Farnham.
  - The settlement can be accessed by non-car modes including bus services along the A325 and Fullers Road. It is also accessible on foot and by cycle for residents (depending on their mobility and care needs) plus the scheme's employees and visitors.
  - There is access to wider recreation and leisure opportunities in the immediate area such as Alice Holt, depending upon the mobility of residents.
  - The character and infrastructure of the settlement can accommodate appropriate levels of additional development to support needs.
12. One specific retirement village with care opportunity on a site known as Land at Fullers Road has been the subject of a Call for Sites submission in 2019 (EHDC Site Ref: BIN-005). This followed a submission of the site for residential by Falcon Developments in 2018. The representations have been confirmed by EHDC Policy Officers upon each iteration of the Land Availability Assessment. A separate representation by Falcon Developments is also being made to this consultation. C Squared supports this proposed allocation and the appropriateness of that site generally for residential development.
13. We look forward to working with EHDC on the formulation of this policy and the identified site as an allocation as the Plan progresses to the next consultation stage.

## **Development Strategy & Spatial Distribution – Question DEV1**

14. C Squared supports identification of the importance of providing a sufficient amount and variety of land to meet housing needs and specific groups. The identification of a range of spatial distribution options is an important part of this Local Plan review to test which approach can support the climate emergency and "living locally" objective.
15. C Squared supports Option 1 and the development of new homes in a wider range of settlements.
16. Option 1 is the most consistent with the "living locally" objective as it will ensure that all settlements and communities can benefit from the beneficial effects of residential development. This includes meeting broad population needs and offering a boost for local services and businesses through increased expenditure and spin-off benefits for the local economy. The introduction of additional population should also benefit the settlement and offer a platform for potential investment in new and improved services which can benefit the existing wider community. The sustainability benefits are also preferable as there will be less need to travel by car to access which in turn will reduce emissions and encourage the use of alternative forms of transport.
17. We note Holt Pound is identified as Tier 3 (small) settlement in the proposed hierarchy and a Small Local Service Centre in the evidence base. This is an appropriate position in the

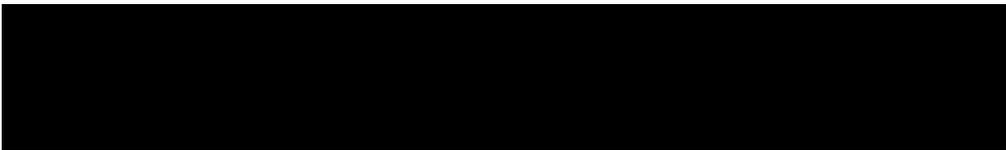
# FREETHS

hierarchy given the current size and role of the settlement. We do however note some omissions in the Settlement Hierarchy evidence base scoring (see Appendix D) and Community Facilities Study 2022 for Holt Pound and its available services, namely the following:

- Place of Worship (St James Church);
  - Community Hall (Rowledge Village Club);
  - Public House (Ball & Wicket); and
  - Creche (as part of Little Fishes Nursey School).
18. Based on a convenient 20-minute walking time for pedestrians, Holt Pound also benefits from ease of access to the following additional facilities within adjacent Rowledge:
- Post Office;
  - Co-op convenience store;
  - Pharmacy; and
  - Public House (Hare & Hounds).
19. Whilst these additional facilities are within the adjoining administrative area, the assessment should take account of the convenient and safe access that is available to “cross-boundary” services and how it operates sharing services with Rowledge such as the Church.
20. The inclusion of these services will increase Holt Pound’s settlement score and reinforce its suitability as a settlement. It also demonstrates how its characteristics offer the potential to accommodate additional growth for the reasons explained at paragraph 11 above, consistent with Option 1. The settlement also has no constraints being positioned immediately outside the National Park and not being subject to other statutory constraints. This is recognised in the Spatial Development options paper where it is not within the settlements listed that are subject to constraints such as flood risk and statutory designations.
21. Against this background, there are no specific reasons to downplay Holt Pound’s suitability to accommodate some additional growth to meet housing needs including older persons accommodation. The Plan should be positive, and the settlement be identified for an appropriate level of growth, irrespective of the final spatial distribution option that is selected.
22. We recognise that this consultation is not to consider specific development opportunities in settlements. We therefore look forward to working with EHDC officers through to the next consultation stage on appropriate growth levels for Holt Pound and the site referred to earlier in this representation.

## Next Steps

23. We look forward to receiving acknowledgement of this representation and continuing to work with EHDC on the matters raised above in the formulation of the Local Plan towards the next consultation stage.



16<sup>th</sup> January 2023

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

Sent by email: [localplan@easthants.gov.uk](mailto:localplan@easthants.gov.uk)

Dear Sir / Madam,

**RE: Response to the East Hampshire District Council (EHDC) Local Plan 2021 Issues and Priorities Regulation 18 Part 1 – January 2023**

I act on behalf of our client, Silverdog Investments Limited, who have an ongoing interest in the following site which was submitted to and assessed by EHDC in the 2022 Land Availability Assessment (LAA):

*LAA/ROP-026: Land at Ropley Lime Quarry, Soame's Lane, Ropley, Alresford, SO24 0ER.*

For clarity, the location plan as submitted for the 2022 call for sites exercise is shown below.



*Above: Site location plan showing the site outlined in red.*

These comments are made in response to the current EHDC Local Plan 2022 Issues and Priorities Regulation 18 Part 1 made under Regulation 18 of the Town and Country Planning Act (Local Planning)

(England) Regulations 2012. This letter provides formal comments and I trust that these representations duly made within the determined timescales, will be formally accepted and considered by EHDC as the local plan progresses to the next stage.

I understand that my response will be published with my name and associated representation.

### Background to the site and planning history

By way of background, our client owns this 4.079 ha site. This was submitted as a potential housing site for the 2022 LAA but has unfortunately been excluded by EHDC due to being 800m from the settlement policy boundary. As such, no detailed assessment of the site has been undertaken by EHDC.

The site has a lawful use as a quarry. It is subject to an Interim Development Order (IDO) permission (ref. F20209/6C) granted by HCC which allows for the working of the site for chalk from the 15th June 1994 to the 31st March 2042.

The site has remained vacant for a considerable number of years however quarrying is scheduled to recommence in 2023 whilst residential options for the site are being explored.

Residential is considered to be an appropriate long-term solution for the site and the principle of this use has previously been accepted by EHDC under planning permission ref. 20209/007, a scheme for 6 dwellings which was approved by EHDC on the 19<sup>th</sup> September 2014. A more recent application made under ref. 20209/011 for 10 dwellings had officer support but was unfortunately refused by members of the Planning Committee on the 20<sup>th</sup> November 2018.

### Comments on Population and Housing

Regarding the unmet needs of other planning neighbours, the Partnership for South Hampshire are currently preparing a sub-regional planning statement to establish revised housing figures for each member authority. We note that to ensure soundness, this document should be considered in full when available to inform the housing figures for the EHDC local plan. If an increased housing need arises for EHDC, which we consider to be likely, sites such as LAA/ROP-026 will need to be considered to assist with delivery over the plan period.

### Comments on Development Strategy and Spatial Distribution

It is clear from the consultation document that the overall approach to the location of housing has largely been driven by the climate change emergency and the associated need to reduce travel distances and increase opportunities for walking and cycling as a means of transport. The consultation document is clear that the new settlement hierarchy will be informed largely by this.

We agree that it is extremely important to respond to the climate emergency but note that weight should also be given to the Government's aim of '*significantly boosting the supply of housing*' in determining the new development strategy and the spatial distribution of housing to respond to local housing need.

There are 5 levels within the settlement hierarchy for the adopted Joint Core Strategy (JCS) and within this Ropley comprises an '*other settlement with a settlement policy boundary*', the 4<sup>th</sup> level.

We note that the Settlement Hierarchy Background Paper which accompanies the Regulation 18 consultation document doesn't include the full table of settlement categories for the North of South Downs National Park and Whitehill & Bordon area at Appendix A (page 13) and this is assumed to be a typographical error.

The JCS review, undertaken in summer 2018 and presented as part of the draft local plan consultation in 2019 sought to amend this, replacing it with a 6 tier system identifying Ropley in tier 4 as a ‘*settlement with a small number of services*’.

The consultation document now seeks to establish a 4 tier system, identifying Ropley in tier 3 as a ‘*small settlement*’ due to a score of 4 out of 40 in the supporting assessment.

Overall, the approach to Ropley in the settlement hierarchy has been a consistent one.

The consultation document sets out 4 options for the spatial distribution of development which are as follows:

- 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.

We agree that the final strategy is unlikely to comprise one of these options alone and that the character of the EHDC area and the housing need within this area indicate that the chosen strategy is likely to comprise a mixture of these options.

Option 1 is the only option that specifically refers to Ropley given that it seeks to disperse new development within a wider range of settlements. Options 2 – 4, when each taken in isolation, would limit development opportunities and be overly restrictive.

The aim of Option 1 to disperse development to a wider range of settlements is positive however to meet local housing need we consider that:

- Appropriate sites will need to be allocated on land outside of defined settlement boundaries (previously developed land for example).
- There needs to be greater flexibility to further encourage housing development on windfall sites in all parts of the district.

#### Allocations outside of Settlement Boundaries

The NPPF sets out the Government’s objective of ‘*significantly boosting the supply of houses*’ and the consideration of housing allocations in locations outside of defined settlement boundaries on appropriate sites would be entirely appropriate and would help to deliver additional homes in the district, ultimately significantly boosting the supply of houses in accordance with Government aspirations.

This could include site LAA/ROP-026 and it is disappointing that this site has been excluded in the recent LAA for being beyond 800m of the settlement boundary for Ropley.

This site provides an opportunity to effectively re-use brownfield land and to deliver extensive social, environmental and economic benefits for the local area including;

- Provision of housing and contribution to housing land supply.
- Potential for provision of self or custom build units to respond to an identified need.
- Restoration of a working quarry which has permission to operate until 2042.
- Effective use of land in a sensitive manner.
- Provision of a use which is compatible with neighbouring residential properties.
- Extensive benefits to biodiversity, including Biodiversity Net Gain.

There is a historic planning permission which indicates that this is an appropriate site for residential development.

## Greater Flexibility for Windfall Sites

It is considered that building in additional flexibility within emerging policies to encourage windfall development in all parts of the district would help to deliver additional homes and ultimately, to significantly boost the supply of houses within the district.

There is a real opportunity to build in greater flexibility to further encourage housing development delivered on windfall sites in all parts of the district. The consultation document and the Windfall Allowance Updated Methodology Paper, September 2022 acknowledge the contribution that windfall sites can make to meeting housing need. We consider that this should apply to sites both within and outside defined settlement boundaries.

Providing additional support for windfall sites more generally across the district could potentially help to deliver additional homes to meet local needs, significantly boosting the supply of housing in line with Government aspirations.

## Conclusion

In our view, housing is the single most important issue facing the district, and without an adequate supply of new homes, job growth will be stifled resulting in low economic growth overall which in turn, will impact the local economy and the provision of services and facilities for existing residents.

We consider that the provision of the district's full assessed housing needs in well-planned new developments is paramount and if this is not achieved, the local plan will be found unsound, and the consequences of an unsound local plan are too great in the current economic climate.

Whilst we agree that the settlement hierarchy is important, and it is in the interests of good planning to locate as much new development as possible towards the higher order settlements, it must also be recognised that lower order settlements and indeed some areas outside of settlements can be improved and enhanced in terms of their overall sustainability by accommodating new development there. It cannot therefore, be said that all development must adhere to pure arithmetic and arbitrary locations derived solely from measurements of distances from the settlement hierarchy. There must be allowances for exceptions.

In our opinion, the local plan proposes a '*do minimum*' approach with regards to the proposed housing provision. Such an approach is not in the spirit of the NPPF or the Government's commitment to delivering a step change in the delivery of housing and is not considered to be positively prepared as the Framework requires.

It is frankly unacceptable that so many Councils strive to deliver the absolute minimum number of homes required and we consider that this is not proactive and will not influence the affordability of new homes. It is not in the spirit of the step change and significant boost to housing supply that the Government requires, and frankly is contrary to the provisions of the Framework which require a local plan to be prepared positively. Paragraph 74 of the Framework is clear, and we would expect the Council to apply a 20% buffer due to the significant under delivery of housing in the borough over the last three years to improve the prospects of achieving the required supply of sites.

In our view, the Council should propose to meet its housing needs in full and apply an additional buffer of at least 20% to increase the supply and increase the affordability of new homes.

If the Council continues with the current approach, there is a very real prospect that the local plan will be found unsound, and as set out above, the consequences would be dire for the district.

I trust that this submission is useful in confirming my clients comments on the Regulation 18 – Part 1 consultation. We respectfully request that the points noted above are considered and reflected as the plan progresses towards Regulation 18 – Part 2 consultation.

We look forward to engaging further in the process and would be grateful if you could keep us updated with regards to the emerging EHDC local plan, and its timetable for preparation. In the meantime, please do not hesitate to contact me to discuss further.

Yours Faithfully



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Sent by email only to: [localplan@easthants.gov.uk](mailto:localplan@easthants.gov.uk)

10 January 2023

Dear Sirs,

**Re: ~~East Hampshire Local Plan 2021-2040 Issues and Priorities Regulation 18 Part 1~~**

This letter is Gladman Developments Ltd.'s (Gladman) response to the above consultation.

Gladman has expertise in bringing forward deliverable sites for housing through local plans and planning applications. As such Gladman has only responded to the relevant questions on the following topics:

- Population and Housing
- Development Strategy
- Types of Housing

It is acknowledged that as policies develop following the Regulation 18 consultation, related areas and questions will impact upon the above topics. Gladman will respond appropriately to more detailed policies when they are available in any subsequent consultations.

The National Planning Policy Framework (2021) sets of the current tests that must be met for Local Plans to be considered sound. In this regard, we submit that in order to prepare a sound plan it is fundamental that it is:

- **Positively Prepared** – The Plan should be prepared on a strategy which seeks to meet objectively assessed development and infrastructure requirements including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.
- **Justified** – the plan should be an appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base.
- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with National Policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

In order for any Local Plan to be found sound, it must meet these tests. Gladman respond to questions below with this context in mind.

In response to multiple choice questions Gladman have only listed our answer. **U**

**U**



## Population and Housing

### **POP1 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 tests are measured**

#### **POP1a Please explain your answer.**

The Council should use the standard method for calculating Local Housing Need (LHN) (as its starting point, see below). The Framework makes clear that Local Plans should “...provide a clear strategy for bringing sufficient land forward...to address objectively assessed needs over the plan period” (paragraph 23) and set out strategic policies for the scale of development planned in an area and make sufficient provision for, inter alia, housing, including affordable housing (paragraph 20).

### **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)**

**Yes**

#### **POP2a Please explain your answer.**

In determining the minimum number of homes needed, strategic plans should be based upon a LHN assessment defined using the standard method, unless there are exceptional circumstances to justify an alternative approach. These needs should be met as a minimum unless any adverse impacts would significantly and demonstrably outweigh the benefits of doing so. This includes considering the application of policies such as those relating to Green Belt and giving consideration as to whether or not these provide a strong reason for restricting the overall scale, type and distribution of development (Framework paragraph 11b(i)). Where it is found that full delivery of housing needs cannot be achieved (owing to conflict with specific policies of the Framework), local planning authorities are required to engage with their neighbours to ensure that identified housing needs can be met in full (see paragraph 35 of the Framework).

Gladman support the Council in assessing its housing need using the Standard Methodology but this is the **minimum requirement that should be used as a starting point**. We do however believe that to ensure the approach is found sound the submission version of the Local Plan should be accompanied by supporting evidence which assesses whether the minimum LHN figure should be revised to allow for economic growth and other factors including unmet need of neighbouring authorities and areas within the South Downs National Park.

Gladman consider that further consideration of both economic factors and unmet needs is required to justify the potential calculation of housing needs used within the plan.

The Housing and Employment Development Needs Assessment by Icení (May 2022) for the Council found that there an annual need for 297 rented affordable homes, which is notionally 47% of a Local Housing Need of 632 dwellings per annum (as calculated using the standard method (uncapped)).

This need is measured against the requirement of all of East Hampshire including the SDNP and is solely for rented affordable homes.

The standard method calculation does account for affordability through the house price to income ratio, however it does not address such stark affordability issues as seen in East Hampshire, nor does it account of future government policies, changing economic circumstances or other factors which may impact demographic behaviour. Given the current affordability issues in the district, cost of living crisis and market conditions the Council should carefully consider whether an uplift to the housing requirement will help to maximise the delivery of affordable homes.

***POP3 Based on the above should we meet:***

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

***POP3a Please explain your answer.***

An allowance should be made to deliver housing needs from the SDNPA. The SDNPA adopted its own Local Plan in July 2019 after the East Hampshire Joint Core Strategy was adopted in 2014. As the SDNPA Local Plan is only reaching its fifth anniversary in 2024, it is somewhat behind in the plan making cycle and it's not yet known whether there will be adequate sites in order for it to accommodate its own LHN.

As areas outside of the National Park are not constrained in the same manner as a protected landscape (i.e a National Park), East Hampshire should accommodate an appropriate level of growth in sustainable locations.

Given the nature of the SDNP, it is unlikely that major development (10+ dwellings) is likely to come forward in many instances, limited affordable housing delivery. The remaining parts of East Hampshire outside of the national park can help address this likely shortfall.

Please see response to POP4 regarding the Duty to Co-operate.

***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***

The Duty to Cooperate (DTC) is a legal requirement established through Section 33(A) of the Planning and Compulsory Purchase Act 2004, as amended by Section 110 of the Localism Act. It requires local authorities to engage constructively, actively and on an ongoing basis with neighbouring authorities on cross-boundary strategic issues throughout the process of Plan preparation. As demonstrated through the outcome of the 2020 Sevenoaks District Council Local Plan examination and subsequent Judicial Review, if a Council fails to satisfactorily discharge its Duty to Cooperate, this cannot be rectified through modifications and an Inspector must recommend non-adoption of the Plan.

Whilst Gladman recognise that the Duty to Cooperate is a process of ongoing engagement and collaboration, as set out in the Planning Practice Guidance (PPG) it is clear that it is intended to produce effective policies on cross-boundary strategic matters. In this regard, East Hampshire must be able to demonstrate that it has engaged and worked with neighbouring authorities, alongside their existing joint working arrangements, to satisfactorily address cross-boundary strategic issues, and the requirement to meet any unmet housing needs. This is not simply an issue of consultation but a question of effective cooperation.

The revised Framework introduced a number of significant changes to how local planning authorities are expected to cooperate including the preparation of Statements of Common Ground (SoCG), which are required to demonstrate that a plan is based on effective cooperation and has been based on agreements made by neighbouring authorities where cross boundary strategic issues are likely to exist. Planning guidance sets out that local planning authorities should produce, maintain, and update one or more Statements of Common Ground (SoCG), throughout the plan making process.

The SoCG should provide a written record of the progress made by the strategic planning authorities during the process of planning for strategic cross-boundary matters and will need to demonstrate the measures local authorities have taken to ensure cross boundary matters have been considered and what actions are required to ensure issues are proactively dealt with e.g., unmet housing needs.

In the context of the DTC, the Council should be able to demonstrate how it has actively sought to engage with neighbouring authorities to address any cross boundary strategic issues, including any unmet housing needs.

Such an approach would be in line with the NPPF which requires the local housing need figure of the Standard Methodology to be uplifted for unmet needs from neighbouring areas. The PPG also contains guidance in this area, including confirmation that the Standard Methodology figure is a minimum, this is expanded on further in the PPG discussing reasons by which the Standard Methodology figure might be increased – including for economic growth.

It will also be important for the Council to remember that the housing need figure which comes from the Standard Methodology is the minimum that it should be seeking to meet. As well as reflecting the issues considered above with regard the housing requirement the Council will also need to ensure that the plan is sufficiently flexible (In terms of housing numbers) to respond to rapid change, this may relate to a problem with the approved strategy in terms of housing. The Council must be sure its assessment of housing needs is robust in these regards, by providing an evidence base document to accompany the submission of the Local Plan.

There is unmet need from the neighbouring authorities in the Partnership for South Hampshire (PFSH) area. It is understood that as of October 2021 the outcome of using the latest housing need and supply figures is that the level of unmet need is some 13,000 dwellings up to 2036 in the PFSH area.

There is significant unmet need in adjoining authorities and areas/settlements within East Hampshire immediately adjacent to the PFSH boundary are also constrained by the SDNP. East Hampshire should therefore work with PFSH to accommodate some of its unmet needs where it can,

which owing to these constraints may be elsewhere within the district. Development will need to be put in locations that are or can be made sustainable in accordance with the NPPF.

#### **Development Strategy Consultation Question U**

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

**Option 1, Option 2, Option 3, Option 4. U**

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

There are number of sustainable settlements within East Hampshire that are capable of accommodating growth, such as Four Marks and sites .adjacent to these existing settlements are likely to be able to deliver quickly and have access to a range of established facilities.

Four Marks has a range of services and facilities that could be expected of a small town, including primary school, supermarkets, employment and good bus services to larger centres. It is noted that in the Settlement Hierarchy paper that Four Marks is not fully considered a 20 minute neighbourhood due to the location of the primary school however land at Lymington Bottom (see Appendix 1) is a site that as good access to both primary school and village facilities.

It is likely that a combination of Options 1 and 2 will deliver a range of sites to help the Council to quickly and efficiently deliver its housing requirements without the need for significant amounts of infrastructure, long lead in times and wider environmental considerations that may be necessary when considering a new settlement.

#### **Types of Housing Consultation Question U**

**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**

**HOU1a Please explain your reasons.**

There is the need for the construction of homes aimed specifically at the needs of older people. This will enable the existing population to move from homes that are no longer suitable into specialist older persons housing, allowing larger family sized homes to be released for younger households, however consideration need to be made for existing stock across the District which is occupied and may be adapted by existing tenants.

Fundamentally, housing mix should be informed by local housing needs evidence to ensure that the right types of homes are built where they are needed - requirements for M4(3) should only be put in place where a need has been identified and evidenced.

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

**No**

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

**No**

**HOU4a** *Please explain your answer.*

Following consultation in summer 2022, Government advised that M4(2) standards would be set as the minimum standards for all new homes. It was noted that further consultation would be undertaken prior to amending the corresponding Building Regulations and statutory guidance.

Should these national requirements come into place, there will be no need for a specific local plan policy (that would duplicate this requirement).

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

**No**

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

- **Only large development sites (over 10 units)**

**HOU6a** *Please explain your answer.*

There is a need for a mix of house types, sizes and tenures to meet the needs of the local area. Gladman suggests that a flexible approach is taken regarding housing mix which recognises that needs and demand will vary from area to area and site to site; ensures that the scheme is viable; and provides an appropriate mix for the location and market.

Need and demand may also change over the time of the plan period. A fixed policy is unlikely to meet the needs of the community it is trying to cater for.

The Council will also need to consider where there may be an overlap with other national policy requirements such as those First Homes which may address and accommodate a range of property types.

**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.*

There is a need for market and affordable housing within East Hampshire and Gladman supports the need to address the affordable housing requirements of the borough. The NPPF is clear that the derivation of affordable housing policies must not only take account of need but also viability and deliverability.

Any increase above 40% may well render sites unviable or unattractive for the market to deliver. However, the Housing and Employment Development Needs Assessment by Icení (May 2022) for the Council found that there an annual need for 297 rented affordable homes, which is notionally 47% of a Local Housing Need of 632 dwellings per annum (as calculated using the standard method (uncapped)).

This need is measured against the requirement of all of East Hampshire including the SDNP and is solely for rented affordable homes. There are a number of different products within affordable housing including Starter Homes, therefore all affordable homes delivered will not need the need identified. As noted above, increasing above 40% is likely to render some developments unviable.

The need for affordable homes is clearly 'acute'. In order to maximise deliver of the affordable homes required, the Council look to deliver in excess of its housing requirement derived from the Standard Method. This will help to address affordability issues and deliver affordable housing need for East Hampshire, including areas within the SDNP.

### **Conclusion**

Gladman welcomes the opportunity to comment on the East Hampshire Local Plan 2021-2040 - Issues and priorities Regulation 18 - Part 1 and looks forward to engaging with the Council further as the plan progresses.

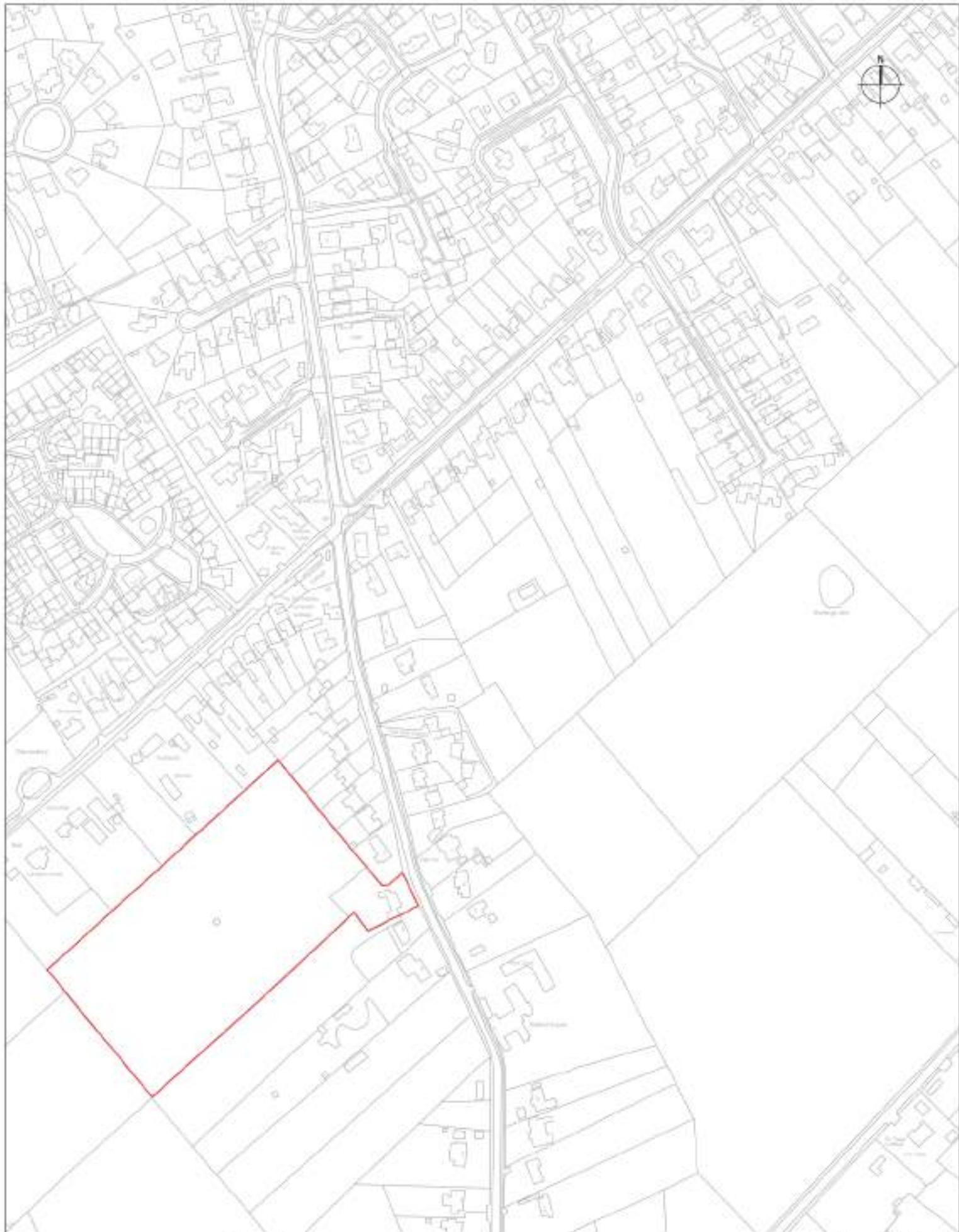
We would be grateful if the Council could add our email to the consultation database.

Yours Faithfully,

**Gladman Developments Ltd.**



Appendix 1 – Land off Lymington Bottom, Four Marks



 <p><b>GLADMAN</b>          10000 10th Avenue          Suite 100          Dallas, TX 75243          Tel: 972.350.0000          Fax: 972.350.0001          www.gladman.com</p>	<table border="1"> <tr> <td>1</td> <td>2</td> <td>3</td> <td>4</td> </tr> <tr> <td>Plan</td> <td>Block</td> <td>Lot</td> <td>Block/lot notes</td> </tr> </table>				1	2	3	4	Plan	Block	Lot	Block/lot notes	<p><b>Four Marks, Lymington Bottom 2018 - 087</b></p>		<table border="1"> <tr> <td>Drawn by</td> <td>IS LLOYD</td> </tr> <tr> <td>CHECKED BY</td> <td>CHECKED_DATE</td> </tr> <tr> <td>CHECKED BY</td> <td>CHECKED_DATE</td> </tr> <tr> <td>CHECKED BY</td> <td>CHECKED_DATE</td> </tr> </table>		Drawn by	IS LLOYD	CHECKED BY	CHECKED_DATE	CHECKED BY	CHECKED_DATE	CHECKED BY	CHECKED_DATE
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# East Hampshire District Council

## Regulation 18 (Issues & Priorities): Part 1 Local Plan Consultation

Representations on behalf of Teresa Bradley

Horndean Football Club, Five Heads Road,  
Horndean, Waterlooville

January 2023



Henry Adams LLP Rowan House, Baffins Lane, Chichester, West Sussex PO19 1UA

01243 533633 planning@henryadams.co.uk [henryadams.co.uk](http://henryadams.co.uk)

Town Planning ► Development Consultancy



## 1 Introduction

- 1.1 This representation provides a response to the Regulation 18: Part 1 (Issues & Priorities) on behalf the owners of Horndean Football Club, who is in control of the land identified on the attached plan (HA Appendix 1: Site Location Plan) and known as Horndean Football Club, Five Heads Road, Horndean.
- 1.2 This representation will provide written responses in relation to some of the questions in the Regulation 18: Part 1 Consultation which directly relate to the promotion of our client's land for future development.

## 2 Responses to Issues & Priorities Survey

### Vision

- 2.1 This section provides responses to the questions within the East Hampshire Regulation 18 (Issues & Priorities): Part 1 Consultation Survey. Our responses to the survey questions have a mix of multiple choice and comment answers, which are provided in bold.

- 2.2 VIS1 How do you feel about this vision? (very happy / **happy** / neutral / unhappy / very unhappy)

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

**The vision covers the three main aspects of sustainable development and responds the Council's adopted climate change emergency.**

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

**The vision could mention the need to provide sufficient housing within the East Hants area.**

- 2.4 VIS3 Should the vision be more specific about areas of the district being planned for through the Local Plan? (Y/N)

### No

- 2.5 VIS3a Please explain your answer.

**The vision should be high level and should not detail the specific areas planned for growth through the Local Plan. The development strategy should be set out in separate, specific policies which detail the overall strategy.**

### Overview

- 2.6 OV1 – Issues & Priorities in order of importance

**Ranked in order (1 being the highest priority)**

- 1. Population & Housing**
- 2. Types of Housing Need**
- 3. Environment**
- 4. Climate Emergency**
- 5. Infrastructure**

**The Climate Emergency**

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

**Yes**

- 2.8 CLIM2 So far, you've told us the following - but what's most important to you? (Sort in order of importance).

**Ranked in order (1 being the highest priority)**

- 1. 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**
- 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. That all new buildings should be zero carbon**

- 2.9 CLIM 3 Do you agree that the Council should define 'net-zero carbon development' in this way? (Y/N)

**Yes, the definition of net-zero carbon development should be as clear as possible so that the expectations for development are known from the outset.**

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

**N/A**

- 2.11 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)

**Yes, this approach provides a good basis for tackling the impacts of climate change.**

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

**N/A**

2.13 CLIM5 Should the detailed criteria for tackling climate change be specified in any of the following:

In emerging East Hampshire Local Plan **Yes**

In future Neighbourhood Plans **No**

In Local Design Codes **Yes**

2.14 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).

2.15 CLIM6a Please explain your response.

**The principle of this approach might be acceptable in some cases but might not always be practical in relation to where there is need for housing (eg's: in smaller villages with fewer amenities and in rural communities).**

#### **Population & Housing**

2.16 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.**

2.17 POP1a Please explain your answer

**This is the recommended way for calculating housing need by Central Government and should be used unless exceptional circumstances exist.**

2.18 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)

**No.**

**Meeting the unmet housing needs of our neighbours South Downs National Park Authority (SDNPA)**

2.19 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)

2.20 POP3a Please explain your answer.

**There is a need to conserve and enhance the landscape within the South Downs National Park which will result in some limitations on development. Given the planning constraints within the National Park, it is considered likely that less housing will be delivered. It would therefore be appropriate to factor in providing for some of the housing needs in the South Downs National Park.**

- 2.21 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.

- 2.22 POP4a Please explain your reasons.

**See answer to POP3a**

#### **Types of Housing**

- 2.23 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**

- 2.24 HOU1a Please explain your reasons.

**All of these criteria could be incorporated in a housing policy for older people. The housing will need to be specific to older persons (eg- ideally single storey, adaptable to assisted living). The location should be spread across the District to provide a distribution of housing for older persons across East Hants. It is recommended that the number or percentage for older people housing is set out in site specific policies and for developments over a certain size.**

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

**See answer to policy HOU1a.**

- 2.26 HOU3 Should the Local Plan include a specific policy on adaptable housing? (Y/N)

**Yes.**

- 2.27 HOU4 Should there be a requirement on large sites for a percentage of new homes to be adaptable?(Y/N)

**Yes.**

2.28 HOU4a Please explain your answer.

**This would meet a local housing need for people with disabilities within the East Hants area.**

2.29 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)

2.30 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.

**It may not always be viable or possible to provide smaller units on minor developments.**

2.31 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)

2.32 HOU7a Please explain your answer.

**The current requirement of 40% for affordable housing should be used.**

2.33 HOU8 Are there any other forms of housing that the Local Plan should refer to? (Y/N)

**Yes.**

2.34 HOU8a If yes, please state what other forms of housing.

**The Local Plan could promote self-build developments and provide relevant criteria.**

#### **Environment**

2.35 ENV1 Which of the below environmental considerations is most important to you? Sort in order of importance, from the most important to the least.

**Ranked in order (1 being the highest priority)**

**1. Protecting the most vulnerable existing protected habitats and species;**

**2. Conserving the character of rural landscapes;**

**3. Achieving improvements to local wildlife habitats;**

**4. Creating better natural links between existing habitats.**

**Infrastructure**

2.36 INF1 What type of infrastructure is most important to you? (Sort in order of importance)

**Ranked in order (1 being the highest priority)**

- 1. Health**
- 2. Schools, colleges**
- 3. Transport**
- 4. Community facilities**
- 5. Sport / Green spaces**
- 6. Energy supplies and water**
- 7. Internet and mobile phone reception**

2.37 INF2 How do you feel about the allocation of CIL funds to date? (Very happy / Happy / **Neutral** / Unhappy / Very unhappy).

2.38 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.**

**CIL funds should be distributed across a mix of smaller, medium and larger sites to provide as much benefit to the local towns and villages as possible.**

**Development Strategy & Distribution**

2.39 DEV1 Please rank these options in order of preference

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

2.40 DEV2 Why have you ranked the options in this way? (Please give reasons for your chosen ranking)

**It is considered that the approach should concentrate on expending the existing settlements, which are already sustainably located, close to services and facilities.**

**Paragraph 68 of the NPPF states that small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are**

often built-out relatively quickly. To promote the development of a good mix of sites local planning authorities should:

- a) *identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved;*
- b) *use tools such as area-wide design assessments and Local Development Orders to help bring small and medium sized sites forward;*
- c) *support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes; and*
- d) *work with developers to encourage the sub-division of large sites where this could help to speed up the delivery of homes.*

2.41 DEV3 Are there any alternative options we should consider? (Y/N)

**No. See answer to DEV3.**

#### **General Consultation Question**

2.42 GEN1 How do you feel about this consultation? (Very happy / **Happy** / Neutral / Unhappy / Very unhappy).

2.43 GEN2 Is there anything else you would like to tell us in response to this consultation? (please explain).

**Our client's site, Horndean Football Club, as shown in (HA Appendix 1: Site Location Plan) is located within an existing settlement and in a sustainable location, close to existing housing and other local facilities within Horndean. The site therefore represents an opportunity for redevelopment in the future, given its locational advantage and sustainable credentials.**

**Whilst it is recognised that the site is currently designated as an Asset of Community Value, our client is currently pursuing other sites for the Horndean Football Club to re-locate to. As the intention is to re-locate the Horndean Football Club to an alternative site, our clients would be grateful if the Council could continue to keep an open mind about the potential re-development of this site in the future.**



# East Hampshire District Council

## Regulation 18 (Issues & Priorities): Part 1 Local Plan Consultation

Representations on behalf of [REDACTED] &  
[REDACTED]

Land at Alton Lane, Four Marks, Alton

January 2023



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Town Planning ► Development Consultancy



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A list of our members and partners is available for inspection at our registered office at Rowan House, Baffins Lane, Chichester PO19 1UA  
Regulated by the RICS (Royal Institution of Chartered Surveyors)

## 1 Introduction

- 1.1 This representation provides a response to the Regulation 18: Part 1 (Issues & Priorities) on behalf of the [REDACTED] who are the landowners identified on the attached plan (HA Appendix 1: Site Location Plan), hereon referred to as the site.
- 1.2 This representation will provide written responses in relation to the questions in the Regulation 18: Part 1 Consultation which directly relate to the promotion of our client's land for future development.

## 2 Responses to Issues & Priorities Survey

### Vision

- 2.1 This section provides responses to the questions within the East Hampshire Regulation 18 (Issues & Priorities): Part 1 Consultation Survey. Our responses to the survey questions have a mix of multiple choice and comment answers, which are provided in bold below.
- 2.2 VIS1 How do you feel about this vision? (very happy / **happy** / neutral / unhappy / very unhappy)
- 2.2 VIS2 Does the vision cover the key matters of importance that the Local Plan can influence and inform?

**The vision covers the three main aspects of sustainable development and responds the latest climate change emergency.**

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

**The vision could mention the need to provide sufficient housing within the East Hants area.**

- 2.4 VIS3 Should the vision be more specific about areas of the district being planned for through the Local Plan? (Y/N)

### No

- 2.5 VIS3a Please explain your answer.

**The vision should be high level and should not detail the specific areas planned for growth through the Local Plan. The development strategy should be set out in separate, specific policies which detail the overall strategy.**

## Overview

- 2.6 OV1 – Issues & Priorities in order of importance

### Ranked in order (1 being the highest priority)

1. Population & Housing
2. Types of Housing Need
3. Environment
4. Climate Emergency
5. Infrastructure

### The Climate Emergency

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

#### Yes

- 2.8 CLIM2 So far, you've told us the following - but what's most important to you? (Sort in order of importance).

### Ranked in order (1 being the highest priority)

1. 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
2. That the construction of new buildings should use less fossil fuels and more recycling of materials
3. 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
4. That trees and other green infrastructure could play an important role in reducing flood risks
5. That all new buildings should be zero carbon

- 2.9 CLIM 3 Do you agree that the Council should define 'net-zero carbon development' in this way? (Y/N)

**Yes, the definition of net-zero carbon development should be as clear as possible so that the expectations for development are known from the outset.**

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

N/A

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- 2.11 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)

**Yes, this approach provides a good basis for tackling the impacts of climate change.**

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

**N/A**

- 2.13 CLIM5 Should the detailed criteria for tackling climate change be specified in any of the following:

In emerging East Hampshire Local Plan **Yes**

In future Neighbourhood Plans **No**

In Local Design Codes **Yes**

- 2.14 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).

- 2.15 CLIM6a Please explain your response.

**The principle of this approach might be acceptable in some cases but might not always be practical in relation to where there is need for housing (eg's: in smaller villages with fewer amenities and in rural communities).**

#### **Population & Housing**

- 2.16 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.**

- 2.17 POP1a Please explain your answer

**This is the recommended way for calculating housing need by Central Government and should be used unless exceptional circumstances exist.**

- 2.18 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)

No.

**Meeting the unmet housing needs of our neighbours South Downs National Park Authority (SDNPA)**

2.19 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)

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**There is a need to conserve and enhance the landscape within the South Downs National Park which will result in some limitations on development. Given the planning constraints within the National Park, it is considered likely that less housing will be delivered. It would therefore be appropriate to factor in providing for some of the housing needs in the South Downs National Park.**

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**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.

2.22 POP4a Please explain your reasons.

**See answer to POP3a**

**Types of Housing**

2.23 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**

2.24 HOU1a Please explain your reasons.

**All of these criteria could be incorporated in a housing policy for older people. The housing will need to be specific to older persons (eg- ideally single storey,**

**adaptable to assisted living). The location should be spread across the District to provide a distribution of housing for older persons across East Hants. It recommended that the number or percentage for older people housing is set out in site specific policies and for developments over a certain size.**

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

**See answer to policy HOU1a.**

2.26 HOU3 Should the Local Plan include a specific policy on adaptable housing? (Y/N)

**Yes.**

2.27 HOU4 Should there be a requirement on large sites for a percentage of new homes to be adaptable?(Y/N)

**Yes.**

2.28 HOU4a Please explain your answer.

**This would meet a local housing need for people with disabilities within the East Hants area.**

2.29 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)

2.30 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.

**It may not always be viable or possible to provide smaller units on minor developments.**

2.31 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)

2.32 HOU7a Please explain your answer.

**The current requirement of 40% for affordable housing should be used.**

2.33 HOU8 Are there any other forms of housing that the Local Plan should refer to? (Y/N)

**Yes.**

2.34 HOU8a If yes, please state what other forms of housing.

**The Local Plan could promote self-build developments and provide relevant criteria.**

2.35 ENV1 Which of the below environmental considerations is most important to you? Sort in order of importance, from the most important to the least.

**Ranked in order (1 being the highest priority)**

- 1. Protecting the most vulnerable existing protected habitats and species;**
- 2. Conserving the character of rural landscapes;**
- 3. Achieving improvements to local wildlife habitats;**
- 4. Creating better natural links between existing habitats.**

**Infrastructure**

2.36 INF1 What type of infrastructure is most important to you? (Sort in order of importance)

**Ranked in order (1 being the highest priority)**

- 1. Health**
- 2. Schools, colleges**
- 3. Transport**
- 4. Community facilities**
- 5. Sport / Green spaces**
- 6. Energy supplies and water**
- 7. Internet and mobile phone reception**

2.37 INF2 How do you feel about the allocation of CIL funds to date? (Very happy / Happy / **Neutral** / Unhappy / Very unhappy).

2.38 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

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Large sites

**A mix of these INF3a Please explain your answer.**

**CIL funds should be distributed across a mix of smaller, medium and larger sites to provide as much benefit to the local towns and villages as possible.**

#### **Development Strategy & Distribution**

2.39 DEV1 Please rank these options in order of preference

**Option 1: Disperse new development to a wider range of settlements**

**Option 3: Distribute new development by population**

**Option 2: Concentrate new development in the largest settlements**

**Option 4: Concentrate development in a new settlement**

2.40 DEV2 Why have you ranked the options in this way? (Please give reasons for your chosen ranking)

**It is considered that the approach should concentrate on expending the existing settlements, which are already sustainably located, close to services and facilities.**

**Paragraph 68 of the NPPF states that small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. To promote the development of a good mix of sites local planning authorities should:**

- a) identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved;*
- b) use tools such as area-wide design assessments and Local Development Orders to help bring small and medium sized sites forward;*
- c) support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes; and*
- d) work with developers to encourage the sub-division of large sites where this could help to speed up the delivery of homes.*

2.41 DEV3 Are there any alternative options we should consider? (Y/N)

**No. See answer to DEV3.**

#### **General Consultation Question**

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- 2.42 GEN1 How do you feel about this consultation? (Very happy / **Happy** / Neutral / Unhappy / Very unhappy).
- 2.43 GEN2 Is there anything else you would like to tell us in response to this consultation? (please explain).

## HA Appendix 1: Site Location Plan



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# East Hampshire District Council

## Regulation 18 (Issues & Priorities): Part 1 Local Plan Consultation

Representations on behalf of Trustees of Rowlands  
Castle Brickworks Trust

Land south-east of The Drift, Rowlands Castle

January 2023



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## 1 Introduction

- 1.1 This representation provides a response to the Regulation 18: Part 1 (Issues & Priorities) on behalf of the Trustees of Rowlands Castle Brickworks, who are in control of the land identified on the attached plan (HA Appendix 1: Site Location Plan, hereon referred to as the site).
- 1.2 This representation will provide a written responses in relation the questions in the Regulation 18: Part 1 Consultation which directly relate to the promotion of our client's land for future development.

## 2 Responses to Issues & Priorities Survey

- 2.1 This section provides responses to the questions within the East Hampshire Regulation 18 (Issues & Priorities): Part 1 Consultation Survey. Our responses to the survey questions have a mix of multiple choice and comment answers, which are provided in bold.

### **Vision**

- 2.2 VIS1 How do you feel about this vision? (very happy / happy / neutral / unhappy / very unhappy)
- 2.3 VIS2 Does the vision cover the key matters of importance that the Local Plan can influence and inform?

**The vision covers the three main aspects of sustainable development and responds the latest climate change emergency.**

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

**The vision could mention the need to provide sufficient housing within the East Hants.**

- 2.5 VIS3 Should the vision be more specific about areas of the district being planned for through the Local Plan? (Y/N)

### **No**

- 2.6 VIS3a Please explain your answer.

**The vision should be high level and should not detail the specific areas planned for growth through the Local Plan. The development strategy should be set out in separate, specific policies which detail the overall strategy.**

#### **Overview**

2.7 OV1 – Issues & Priorities in order of importance

**Ranked in order (1 being the highest priority)**

- 1. Population & Housing**
- 2. Types of Housing Need**
- 3. Environment**
- 4. Climate Emergency**
- 5. Infrastructure**

#### **The Climate Emergency**

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

#### **Yes**

2.9 CLIM2 So far, you've told us the following - but what's most important to you? (Sort in order of importance).

**Ranked in order (1 being the highest priority)**

- 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 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**
- 4. That trees and other green infrastructure could play an important role in reducing flood risks**
- 5. That all new buildings should be zero carbon**

2.10 CLIM 3 Do you agree that the Council should define 'net-zero carbon development' in this way? (Y/N)

**Yes, the definition of net-zero carbon development should be as clear as possible so that the expectations for development are known from the outset.**

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

**N/A**

2.12 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)

**Yes, this approach provides a good basis for tackling the impacts of climate change**

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

**N/A**

2.14 CLIM5 Should the detailed criteria for tackling climate change be specified in any of the following:

In emerging East Hampshire Local Plan **Yes**

In future Neighbourhood Plans **No**

In Local Design Codes **Yes**

2.15 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).

2.16 CLIM6a Please explain your response.

**The principle of this approach might be acceptable in some cases but might not always be practical in relation to where there is need for housing (eg's: in smaller villages with fewer amenities and in rural communities).**

### **Population & Housing**

2.17 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**

2.18 POP1a Please explain your answer

**This is the recommended way for calculating housing need by Central Government and should be used unless exceptional circumstances exist.**

2.19 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)

**No**

**Meeting the unmet housing needs of our neighbours South Downs National Park Authority (SDNPA)**

2.20 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)

2.21 POP3a Please explain your answer.

**There is a need to conserve and enhance the landscape within the South Downs National Park which will result in some limitations on development. Given the planning constraints within the National Park it is considered likely that less housing will be delivered and therefore it would be appropriate to factor in providing some of the housing needs of the South Downs National Park Authority.**

2.22 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.

2.23 POP4a Please explain your reasons.

**See answer to POP3a**

**Types of Housing**

2.24 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**

2.25 HOU1a Please explain your reasons.

**All of these criteria could be incorporated in a housing policy for older people. The housing will need to be specific to older persons (eg- ideally single storey, adaptable to assisted living). The location should be spread across the District to provide a distribution of housing for older persons across East Hants. It is recommended that the number or percentage for older people housing is set out in site specific policies and for developments over a certain size.**

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

**See answer to policy HOU1a.**

2.27 HOU3 Should the Local Plan include a specific policy on adaptable housing? (Y/N)

**Yes**

2.28 HOU4 Should there be a requirement on large sites for a percentage of new homes to be adaptable?(Y/N)

**Yes**

2.29 HOU4a Please explain your answer.

**This would meet a local housing need for people with disabilities within the East Hants area.**

2.30 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)

2.31 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.

**It may not always be viable or possible to provide smaller units on minor developments.**

2.32 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)

2.33 HOU7a Please explain your answer.

**The current requirement of 40% for affordable housing should be used.**

2.34 HOU8 Are there any other forms of housing that the Local Plan should refer to? (Y/N)

**Yes.**

2.35 HOU8a If yes, please state what other forms of housing.

**The Local Plan could provide some criteria for proposed self-build developments.**

#### **Environment**

2.36 ENV1 Which of the below environmental considerations is most important to you? Sort in order of importance, from the most important to the least.

**Ranked in order (1 being the highest priority)**

- 1. Protecting the most vulnerable existing protected habitats and species;**
- 2. Conserving the character of rural landscapes;**
- 3. Achieving improvements to local wildlife habitats;**
- 4. Creating better natural links between existing habitats.**

#### **Infrastructure**

2.37 INF1 What type of infrastructure is most important to you? (Sort in order of importance)

**Ranked in order (1 being the highest priority)**

- 1. Health**
- 2. Schools, colleges**
- 3. Transport**
- 4. Community facilities**

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- 5. Sport / Green spaces
- 6. Energy supplies and water
- 7. Internet and mobile phone reception

2.38 INF2 How do you feel about the allocation of CIL funds to date? (Very happy / Happy / **Neutral** / Unhappy / Very unhappy).

2.39 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.**

**CIL funds should be distributed across a mix of smaller, medium and larger sites to provide as much benefit to the local towns and villages as possible.**

#### **Development Strategy & Distribution**

2.40 DEV1 Please rank these options in order of preference

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

2.41 DEV2 Why have you ranked the options in this way? (Please give reasons for your chosen ranking)

**It is considered that the approach should concentrate on expending the existing settlements, such as Rowlands Castle, which are already sustainably located, close to services and facilities.**

**Paragraph 69 of the NPPF states that small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. To promote the development of a good mix of sites local planning authorities should:**

- a) identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved;**

- b) use tools such as area-wide design assessments and Local Development Orders to help bring small and medium sized sites forward;
- c) support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes; and
- d) work with developers to encourage the sub-division of large sites where this could help to speed up the delivery of homes.

Paragraph 69 confirms that at least 10% of housing requirements should be met from sites of 1 hectare or less. This should be delivered through the Local Plan to ensure certainty.

Whilst our clients land has a scale greater than 1 hectare, it is felt that part of this land could be allocated for development purposes to meet this requirement. It is considered that due to the absence of an appropriate proportion of smaller development sites across the District, the Plan would likely be considered unsound.

2.42 DEV3 Are there any alternative options we should consider? (Y/N)

**No. See answer to DEV3.**

#### **General Consultation Question**

2.43 GEN1 How do you feel about this consultation? (Very happy / **Happy** / Neutral / Unhappy / Very unhappy).

2.44 GEN2 Is there anything else you would like to tell us in response to this consultation? (please explain).

**Additional comments relating to the Reg 18 Consultation are provided in the following sections below.**

### **3 Site Suitability**

3.1 The site is located to the south-east of Rowlands Castle, and comprises agricultural land and equestrian stabling. The site is currently accessed from The Drift and a means of access is available through the approved Bargate site to the north. It is approximately 20.01 acres (8.1 hectares) and broadly rectangular in size.

3.2 The site has defined landscape boundaries and is located outside of any Flood Zones. The majority of the site is flat and is predominately cleared of trees and woodland. The

site is also situated outside of any Conservation Area and in our opinion has no visual landscape impact on the South Downs National Park to the north east.

- 3.3 Rowlands Castle is described as Level 3 Small Local Service Centre in the adopted East Hampshire Joint Core Strategy. These settlements are described as having a 'limited range of services, but are suitable locations to accommodate some new development'. Rowlands Castle has a number of pubs and shops, whilst there is also a mainline train station which provides direct links to Portsmouth and London Waterloo. The train station is in suitable walking distance from the site via the Drift and the Bargate development. The A3 is approximately 3 miles to the North-West, which provides further links to Portsmouth and London.

#### **4 Development Approach – Reg 18, Part 1, Consultation**

- 4.1 It is considered that the development approach of future policies within the Council's Local Plan should concentrate on expanding the existing settlements, such as Rowlands Castle, which in comparison to the previous approach of allocating development in a new settlement, Northbrook Park, have significantly greater sustainability credentials.
- 4.2 It was noted in the previous Reg 18 Draft Local Plan Consultation 2019, in relation to the distribution of housing for Rowlands Castle, the proposed allocation Site SA41 did not relate to Rowlands Castle as an existing settlement. The benefits that could have been identified from this development within and around existing settlements would not have been forthcoming with the siting of at least 115 dwellings for the village being sited away from the settlement. This would have been directed out of the District, into Havant District. Our clients land would however offer a site that is well located to the existing settlement boundary and can offer significant benefits to the local community.
- 4.3 The landowners of land east of The Drift, Rowlands Castle, have worked with the Council in the preparation of the Local Plan to demonstrate the suitability of the site for development. This has previously included the instruction of technical assessments, covering the suitability of the local highway network and means of access, drainage and flood risk, ecology and utilities. These assessments demonstrate the unconstrained nature of the site and its ability to accommodate development within the Plan period.
- 4.4 In order for the Local Plan Review to be considered sound, we recommend that the distribution of housing be concentrated around existing settlements, and therefore avoids a new standalone settlement as previously proposed. This would ensure that the requirements of the Plan can be met.
- 4.5 Similarly, the same approach should be taken to housing provision in Rowlands Castle by allocating sites, such as our clients land east of The Drift. Our clients land could come forward as a small site (1 hectare or less), to assist the Council in meeting the requirements set out in the NPPF, their entire land holding or as comprehensive development alongside land to the south and east.

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**HA Appendix 1 - Site Location Plan**



## Response to Regulation 18 Consultation - Inspired Villages

Mon 16/01/2023 15:55

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 Sir/ Madam,

Please find below and attached a representations by Inspired Villages to the Local Plan Issues and Options consultation ending 16 January 2023.

A copy of accompanying documents which are referenced in our representation is as follows:

- Local Plan Representations by Inspired Villages
- 21st Century Care by Inspired Villages
- Benefits Infographic by Inspired Villages
- The Mayhew Review November 2022 by The International Longevity Centre
- East Hampshire Older Persons Housing Need Report
- Planning Statement submitted in relation to EHDC in relation to application reference 55562/010

This representation is made in response to the Regulation 18 Draft Local Plan '*Issues and Priorities Consultation Document*' specifically, questions HOU1, HOU2, HOU7, HOU7a.

### **Who are Inspired Villages:**

Inspired Villages is a developer and operator of retirement communities in the UK. We are majority owned and fully funded by Legal & General and NatWest Pension Fund. We currently have eight operating villages, with a further 20 sites legally secured with a number of those under construction, consented or in planning/pre-planning. Inspired Villages currently operate a community near Liphook (Bramshott Place) and will shortly be commencing development at a site to the east of Horndean. The planning statement submitted in relation to this application (App Ref: 55562/010 ) is enclosed which gives some further background related to our model. Our business plan is to have 60 operational villages within the next ten years and we currently provide purpose built housing for over 1000 residents.

A retirement community falls under the extra care model and our developments are within the C2 use class. Inspired Villages is a member of Associated Retirement Communities Operators (ARCO) and we encourage East Hampshire District Council to engage with ARCO to assist with your understanding of the Retirement Community Sector, and would recommend you view their website:- <https://www.arco.uk/what-retirement-community>.

### **Need and Allocations for Older Persons Housing**

We would encourage East Hampshire District Council (EHDC) to first identify local needs within the Borough with particular reference to older persons housing so that the right homes can be planned for the right places to meet existing and projected housing need. Greater emphasis should be placed upon the provision of housing for older persons, the Local Plan should set out clear and specific policies to address housing needs for older people with a range of tenure types provided to meet these needs. Further, the provision of housing for older people should allocated within the Plan and be located on land in and adjacent to settlement boundaries, and where proposed development provides sustainable transport and communal facilities, and there is an identified need. The provision of specialist housing should be positively planned for and with specific targets set separately to those created for general housing (C3 Use). Please refer to Recommendations Three and Four within the enclosed Local Plan Representation document.

The creation of an evidence based specific target for older persons housing would be in line with the PPG which sets out guidance for local planning authorities that they should be able to provide indicative figures or a range for the number of units of specialist housing for older people needed across the plan area throughout the plan period (NPPG Paragraph 006 - Reference ID: 63-006-20190626). Further the PPG states that the provision of housing for older people should be included within the monitoring progress demonstrated through the Authority Monitoring Report (NPPG Paragraph: 007 Reference ID: 63-007-20190626). Page 31 of the Issues and Options document sets out that a quarter of residents in the District are over 65 (according to the 2021 census). Further in figures estimated by the HEDNA 2022 the number of people age 65 and over will rise by almost 10,000 people (45.5%) between 2021-2038. The Local Plan should use evidence to set a minimum figure for the provision of housing for older people. This should be calculated using a third party expert on housing need and an agreed methodology to do so, such as that appended to this representation. The enclosed needs report was produced by Barton Willmore (now Stantec) to support a planning application to the east of Horndean. This assessment used a methodology consistent with guidance issued by the Housing Learning Improvement Network (Housing LIN). Demographic data was sourced from 'Projecting Older People Population Information' (POPPI), established by Oxford Brookes University, the Institute of Public Care (IPC) and Experian. In addition, existing older people's accommodation supply data was drawn from the Elderly Accommodation Counsel. We would encourage EHDC to produce an updated report to support the production of the emerging Local Plan and set minimum figures for specific types and tenures of housing for older people.

The enclosed housing need assessment identifies an ageing population and one with an age profile above the national average and where home ownership amongst older people is also significantly above the national average. The result of this, is that even accounting for existing and consented future demand, the needs of home-owning older people is not and will not be met. Levels of owner-occupation among older people in the district are also above national averages at 85% for those between 65 and 74 years of age. This suggests that the current level of provision of Extra Care Housing does not reflect the need for specialist accommodation in all tenures but particularly for that substantive majority of older people who will wish to maintain their tenure of choice when moving to a setting providing the care and support services that meet their needs. The current supply of Market Extra Care Housing in East Hampshire District is approximately 50% of the current need for this type of accommodation. By 2040, current provision will be just 36% of anticipated demand for this tenure. The current provision of Extra Care Housing in the Borough does not reflect the need for such accommodation in all tenures, but particularly for those who will wish to maintain their tenure of choice as homeowners when moving to a setting providing the care and support services that meet their needs. The enclosed information identifies a clear need within East Hampshire District for the provision of housing for older people and whilst the two Inspired villages within the District make a contribution to the provision of housing for older people, there is still a significant need for all forms of housing for older people which should be addressed in detail within the emerging Local Plan.

	Market	Affordable
Population age 75+ in 2020	14,192	
Target Extra Care Provision Rate (per thousand age 75+)	30	15
<b>Current Extra Care Requirement (units)</b>	<b>426</b>	<b>213</b>
Current Extra Care Supply (units of accommodation)	240	0
<b>Current shortfall (as at mid year 2020)</b>	<b>186</b>	<b>213</b>
Population Change, 75+, 2020 to 2036	7,863	
<b>Additional Future Requirement, 2020 to 2036 (units)</b>	<b>236</b>	<b>118</b>
<b>Current Shortfall and Future Requirement to 2036</b>	<b>422</b>	<b>331</b>

Table 4.1 of Barton Willmore Needs Assessment Report – demonstrating need for Extra Care housing in East Hampshire

### Use Class

It is important that the emerging Local Plan includes specific wording regarding planning Use Classes. Use Class C2 as defined in The Town and Country Planning (Use Classes) Order 1987 (as amended) is defined as *“Use for the provision of residential accommodation and care to people in need of care (other than a use within class C3 (dwelling houses)). Use as a hospital or nursing home. Use as a residential school, college or training centre.”* We would request that the Council fully understands that a retirement community falls within the C2 Use Class. A retirement community is clearly different from C3 dwelling houses as evidenced in Paragraphs 2.21 to 2.25 of the attached document. For example, Inspired Villages is responsible for the long term operation, management and ownership of the site, and maintenance of significant communal facilities. The typical quantum of such communal facilities in a typical Inspired Villages retirement community comprise approximately 25% of its floorspace as non-saleable space. This includes the communal and care facilities available to its residents.

Furthermore, a retirement community is a single planning unit – the communal and care facilities and units are integrally linked, one cannot exist without the other. Our investors retain the freehold ownership of the land and Inspired Villages is the operator. This means there is a long term interest in the operation of the village. It is not possible to subdivide a village to provide on-site affordable housing given the single planning unit and residents’ obligations to pay service charge to contribute towards the provision of the facilities, staffing, etc. Again, we would direct you to understand the key ways in which specialist housing for older people differs in a number of ways that affect its viability as set out in the attached representation document. We would encourage the Council to take a proportionate approach to the requirement of affordable housing contributions from specialist operators such as Inspired Villages. Where retirement housing / age restricted housing is proposed, and which falls within the C3 use class (i.e. it provides housing with little, if any, facilities) then it is understood affordable housing may be sought – however, this is not the case with a retirement community as proposed by Inspired Villages.

### **Conclusion**

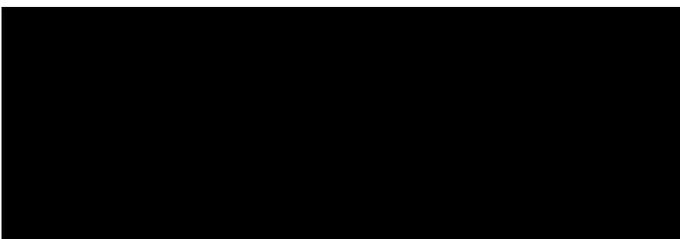
Specialist accommodation for older people should be located in a variety of spatial forms to provide the greatest choice for future residents. Sites should be allocated for specialist accommodation with evidenced housing targets produced for this use. A needs assessment should be produced and correctly referenced to determine the current and anticipated provision of housing for older persons in all tenure types . Many Councils argue that older persons accommodation should be provided through windfall sites alone, however, the provision of specialist housing for this population through windfall sites alone is not sufficient. The emerging Local Plan should make specific site allocations for C2 uses to allow these to come forward in line with recommendation 6 of the enclosed Local Plan representation document.

We would suggest that the allocation of sites through strategic housing areas, windfall sites, and specific specialist accommodation allocations in combination would allow EHDC to set targets for the number of specialist housing for older people with a more targeted approach to the provision of housing for this growing population. Finally, I would also draw your attention to the NPPG Paragraph 4 (Reference ID: 63-004-20190626) which states that the future need for specialist accommodation for older people should be broken down by tenure and type, differentiating between C2 use and C3 use would not be sufficient.

We request that you review the eight recommendations in the attached document set out at Page 5 and request that the Local Plan includes a specific policy (or policies) to encourage the development of specialist housing for older people, sets targets for the delivery of such housing, and allocates specific development sites to ensure this delivery.

Please do not hesitate to contact me directly should you have any further questions.

Kind regards



**A:** Unit 3, Edwalton Business Park, Landmere Lane, Edwalton, Nottingham, NG12 4JL

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



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Registered in England and Wales No: 10876791. Registered Address: Inspired Villages Group Ltd, Unit 3, Edwalton Business Park, Landmere Lane, Edwalton, Nottingham, NG12 4JL

# **OLDER PEOPLE'S HOUSING NEED ASSESSMENT EAST HAMPSHIRE DISTRICT**

On behalf of  
Inspired Villages Limited

January 2022

**OLDER PEOPLE'S HOUSING NEED ASSESSMENT  
EAST HAMPSHIRE DISTRICT**

**ON BEHALF OF  
INSPIRED VILLAGES LIMITED**

**January 2022**

<b>Project Ref:</b>	33567/A5
<b>Status:</b>	FINAL
<b>Issue/Rev:</b>	01
<b>Date:</b>	January 2022
<b>Prepared by:</b>	██████████
<b>Checked by:</b>	██████████
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Date: January 2022

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# **CONTENTS**

## **PAGE NO**

### **EXECUTIVE SUMMARY**

<b>1.0 INTRODUCTION</b>	<b>01</b>
<b>2.0 THE CRITICAL NEED FOR SPECIALIST HOUSING FOR OLDER PEOPLE</b>	<b>02</b>
<b>3.0 LOCAL PLANNING POLICY EVIDENCE RELATING TO HOUSING FOR OLDER PEOPLE</b>	<b>14</b>
<b>4.0 EAST HAMPSHIRE DISTRICT: DEMOGRAPHY AND TENURE OF THE OLDER POPULATION</b>	<b>22</b>
<b>5.0 PROFILE OF OLDER PEOPLE'S HEALTH AND WELLBEING</b>	<b>26</b>
<b>6.0 CURRENT SUPPLY OF SPECIALISED ACCOMMODATION FOR OLDER PEOPLE WITHIN EAST HAMPSHIRE DISTRICT</b>	<b>30</b>
<b>7.0 CURRENT AND FUTURE SPECIALIST HOUSING NEED FOR OLDER PEOPLE WITHIN EAST HAMPSHIRE DISTRICT</b>	<b>34</b>
<b>8.0 SUMMARY AND CONCLUSIONS</b>	<b>37</b>

### **APPENDICES**

<b>1.0 EXPLANATION OF THE TERMS USED IN THIS REPORT</b>	
<b>2.0 SPECIALIST ACCOMMODATION FOR OLDER PEOPLE IN EAST HAMPSHIRE, Q4 2021</b>	

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## EXECUTIVE SUMMARY

- i. Meeting the housing needs of the older population is a clear priority of Government as set out in the recent (December 2021) adult social care white paper. This is emphasised by the housing supply policies of the National Planning Policy Framework (NPPF) which requires an assessment of older persons housing need, and the NPPF's supporting Planning Practice Guidance (PPG) which identifies the need to provide housing for older people as 'critical'.
- ii. This is emphasised by PPG's section on 'Housing for older and disabled people' which sets out the different 'types' of older persons housing which should be provided, including 'extra care' housing such as that proposed by Inspired Villages in East Hampshire District.

Hampshire County Council (HCC) in which East Hampshire District Council (EHDC) is located acknowledges the need for extra care housing across the county, however their focus is on the provision of (commissioning) affordable extra care facilities. The provision of open market extra care is outside the scope of HCC's commissioning role.

- iii. In this context the Council's most recent Housing and Economic Development Needs Assessment (HEDNA) finds that East Hampshire has a higher proportion of owner occupiers in the 65+ age group than Hampshire, the south east, and England, and that there is a *"notable shortfall in the leasehold sector"*. The HEDNA concludes that *"the need for leasehold (market) housing with care (Extra-care/Enhanced sheltered) is estimated to be in the range of 219 to 453 dwellings in the period to 2036 (12-24 per annum)."*
- iv. **Barton Willmore finds that there is a current unmet need for 186 units of market Extra Care housing now, increasing by 236 units over the period 2020 to 2036, a total (current plus future need) requirement for 422 units by 2036.** This is in addition to a total need (current plus future) of 169 units market Enhanced Sheltered housing by 2036.
- v. Barton Willmore's need assessment is based on the most up to date population projections, the latest estimate of current supply and the application of provision rates redolent of the current state of critical need and endorsed by the Planning Inspectorate in recent Local Plan examinations and section 78 appeals.

## 1.0 INTRODUCTION

1.1 This report provides an assessment of Older People's Housing Needs within East Hampshire District and is prepared on behalf of Inspired Villages Limited.

1.2 The methodology used is consistent with guidance issued by the Housing Learning Improvement Network (Housing LIN). Demographic data is sourced from 'Projecting Older People Population Information' (POPPI), established by Oxford Brookes University, the Institute of Public Care (IPC) and Experian. In addition, existing older people's accommodation supply data is drawn from the Elderly Accommodation Counsel (Quarter 4, 2021).

1.3 The report is structured as follows:

**Section 2:** introduces relevant Government policy and guidance, making the case to significantly boost the supply of specialist housing for older people;

**Section 3:** summarises the County Council and District Council's current policy and evidence related to the need for specialist older people's accommodation;

**Section 4:** summarises the demography and tenure profile of older age cohorts within East Hampshire;

**Section 5:** profiles the health and wellbeing of older people living in the district by assessing health and mobility issues in older age cohorts;

**Section 6:** summarises the existing supply of specialist older people's housing within East Hampshire;

**Section 7:** assesses the future pattern of need for specialist older people's housing within East Hampshire, taking account of existing levels of unmet need.

**Section 8:** provides a summary and sets out our key conclusions.

## 2.0 THE CRITICAL NEED FOR SPECIALIST HOUSING FOR OLDER PEOPLE

2.1 A clear priority of Government is to meet the housing needs of the United Kingdom's ageing population. A need that the Government characterises in qualitative terms as follows, making it clear that much of the existing supply of specialist housing for older people is unlikely to meet current and future need:

**"The needs of older people now are different from previous generations and their aspirations around housing and lifestyles have changed dramatically."**<sup>1</sup>

2.2 The above quote comes from the **Government's response to the MHCLG Select Committee inquiry into Housing for Older People, published September 2018**. In reply to the Select Committee's conclusion on the need for a new national strategy for older people's housing, the Government stressed the need to increase the supply of homes for older people and their commitment to a policy framework supportive to that aim:

**"We have set out a strategy to make the housing market work and make sure it works for all parts of our community, including older people. In our Housing White Paper 'Fixing our Broken Housing Market' we recognised that there is a fundamental need to do more to ensure that more homes suitable for older people are being built as part of our overall ambition to increase housing supply.**

**We have also set out plans to start to tackle the lack of affordability and increase choice, and to make the housing market fairer for renters and home owners. We have also set out £44 billion of financial support for housing over the next five years, and we have recently consulted on reforms to the planning system through a revised National Planning Policy Framework. This specifies that local planning authorities are expected to have clear policies for addressing the housing needs of groups including older people. Guidance which supplements the Framework gives further advice on how plan making authorities can identify the housing needs of older people.**

**We also recognise the need to provide more of the right types of homes for older people to help support an ageing population. Offering older people a better choice of accommodation can help them to live independently for longer, improve their quality of life and free up more family homes for other buyers. We will consider the Committee's recommendations alongside wider issues affecting older people in the forthcoming Social Care Green Paper and following the independent review of the Disabled Facilities Grant."**<sup>2</sup>

<sup>1</sup> Page 4, Government response to the Second Report of Session 2017-19 of the Housing, Communities and Local Government Select Committee inquiry into Housing for Older People, September 2018

<sup>2</sup> Page 21-22, Government response to the Second Report of Session 2017-19 of the Housing, Communities and Local Government Select Committee inquiry into Housing for Older People, September 2018

2.3 The clear view of Government is that accommodation needs of older people are not being met, that there is a need to provide more of the right types of homes for older people to meet the needs of an ageing population.

2.4 The recently published **People at the Heart of Care: Adult Social Care White Paper, December 2021** (Social Care White Paper) acknowledges the link between adult social care and appropriate housing. The pivotal role of accommodation is set out early in section four (paragraph 4.5) of the White Paper:

**“Ensuring that people receive the right care and support all begins with where they live, and the people they live with. For older people, having a home that sustains safe, independent living can help prevent ill-health, reduce the amount of care and support they need, and delay or avoid altogether the need for residential care.”**

2.5 The Social Care White Paper acknowledges most older people will prefer to stay in their own home if they need care. However, it is also recognised how this isn't always practical or appropriate:

**“Wherever possible, that care and support should be in a person's own home and personalised in line with their specific needs, although recognising that not everyone has a home of their own, and sometimes specific needs are best met in a supported living or care home setting.”**

2.6 In this context the Social Care White Paper (paragraph 4.6) recognises that the housing that many older people currently live in is unsuitable and potentially harmful, which can lead to unnecessary stays in hospital or premature moves to care homes. Things brings into focus the need to increase the supply of specialist housing for older people:

**“at present, there are too many people with care and support needs living in homes that are not enabling them to live well or safely. Many homes are poorly designed for accommodating changing care and support needs, or older age, and there are some people who do not have a home to call their own. People who are thinking about the future for themselves – or for their loved ones – often do not feel like they have options. A lack of suitable housing options results in too many people staying in hospital unnecessarily, or moving to residential care prematurely even if that is not what they want, instead of recovering at their own home.”** (Our emphasis)

2.7 Having recognised the need for more appropriate accommodation, the Government is clear in its ambitions to ensure that a wide variety of choice is open to the older population. To that end, paragraph 4.7 of the Social Care White Paper reads as follows:

**“Our ambition is to give more people the choice to live independently and healthily in their own homes for longer. This means adults of all ages being able to access or remain in the home of their choice – whether that be their home of today or one they might move into – which forms part of a community they have chosen to call home.”** (Our emphasis)

- 2.8 The heterogenous nature of care needs necessitates support that is flexible and adaptable in the face of changing needs. The Social Care White Paper (paragraph 4.3) acknowledges this as follows:

**“Care and support needs are dynamic, so we should not only be trying to meet a person’s needs in the here and now, but also planning for changing needs. Supporting people to plan for the future – for themselves and their loved ones – includes preventing and reducing future care needs.”**

- 2.9 In the context of dynamic care needs and prevention, The Social Care White Paper (paragraph 4.12) acknowledges specialist housing as a more cost effective setting than more traditional institutional models of care:

**“For some of us, the nature of our care and support needs will mean we need a home that is specifically designed to support independent, healthy living. These homes are generally known as supported housing. There is evidence that for both working age adults and older adults, supported housing can be the best model of care to provide better health, greater independence, as well as closer connection with our friends, family and community. In addition, supported housing can be better value than institutional care (e.g., residential care) which is often more intensive, and so there is the potential to reduce costs to the health and social care system.”** (Our emphasis)

- 2.10 Thus, the Social Care White Paper (paragraph 4.9) proposes to offer financial support to specialised accommodation, to shape the market available to users:

**“We also need to actively shape the specialist housing market – to establish and consolidate local strategic leadership, and create the right incentives for local areas and housing providers to invest, including in new and innovative models of provision. We will therefore invest at least £300 million for the period 2022–23 to 2025–26. This new investment will allow local authorities to deliver the vision set out in this white paper by integrating housing into local health and care strategies, with a focus on boosting the supply of specialist housing and funding improved services for residents. This in turn will drive increased confidence in the social supported housing market, stimulating a positive cycle of further innovation and private investment.”** (Our emphasis)

- 2.11 There is acknowledgement in the Social Care White Paper that the United Kingdom has fallen far behind other developed nations in the provision of specialist accommodation for older

people. To increase the levels of provision in the United Kingdom to those seen in countries such as the United States, Australia, and New Zealand, the Government intends to provide grants alongside a reliance on private investment. To that end, paragraph 4.13 of the Social Care White Paper reads as follows:

**“The UK has a far smaller proportion of people living in these types of accommodation, compare with other countries – around 0.6% compared to around 6% in the United States, 5.5% in New Zealand and 5% in Australia. An important priority for the government in achieving our 10-year vision is therefore to grow investment in both grant-funded and private supported housing to incentivise their supply.”** (Our emphasis)

2.12 The role of developers and investors in delivering the Government’s aspirations to grow the supply of specialist housing for older people are clearly summarised in The Social Care White Paper at paragraph 4.13:

**“We want to support the growth of a thriving older peoples’ housing sector, that builds enough homes to match growing need, gives certainty to developers and investors, and empowers consumers with choice from a diverse range of housing options to suit their needs. In order to achieve this vision, we need to draw on the expertise of the sector to help us find solutions and consider where the government can best intervene. That’s why we remain committed to working closely with stakeholders from across both private and social sectors to inform future cross-government action that will help stimulate a specialist housing market that delivers effectively for both consumers and providers across the country.”** (Our emphasis)

2.13 The ambition of the Social Care White Paper to increase the supply of specialist housing for older people resonate with the **National Planning Policy Framework, July 2021 (NPPF) and the accompanying Planning Practice Guidance**. NPPF acknowledges that housing for older people has a role to play in significantly boosting the supply of homes. Thus, NPPF paragraph 62 reads as follows; ‘... *the size, type and tenure of housing needed should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, **older people**, ...)*’ (Our emphasis).

2.14 The NPPF’s ‘Glossary’ section provides a definition of older people as follows:

- **Older people:** People over or approaching retirement age, including the active, newly retired through to the very frail elderly; and whose housing needs can encompass accessible, adaptable general needs housing through to the full range of retirement and specialised housing for those with support or care needs.

- 2.15 The importance of planning for specialist housing for older people is emphasised in the Planning Practice Guidance (PPG) section on 'Housing for older and disabled people.' Under the heading *Why is it important to plan for the housing needs of older people?* the critical need to provide housing for older people is the first statement made:

**"The need to provide housing for older people is critical. People are living longer lives and the proportion of older people in the population is increasing. In mid-2016 there were 1.6 million people aged 85 and over; by mid-2041 this is projected to double to 3.2 million. Offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems. Therefore, an understanding of how the ageing population affects housing needs is something to be considered from the early stages of plan-making through to decision-taking."**<sup>3</sup>  
(Our emphasis)

- 2.16 The type of housing for older people is also addressed in the PPG. Paragraph ID: 63-004 refers to the evidence sources which can be considered when identifying the housing needs of older people, and states how *"The future need for specialist accommodation for older people broken down by tenure and type (e.g. sheltered housing, **extra care**) may need to be assessed"* (Our emphasis).
- 2.17 In Local Plans, the PPG (ID: 63-006) states how *"authorities should set **clear policies** to address the housing needs of groups with particular needs such as older and disabled people"* (our emphasis) and that these policies should set out *"how the plan-making authority will consider proposals for the **different types of housing** that these groups are likely to require"* (our emphasis). The same paragraph also recommends that authorities could provide *"indicative figures or a range for the units of specialist housing for older people needed across the plan area throughout the plan period."*
- 2.18 PPG (ID: 63-010) moves on to consider *'What are the different types of specialist housing for older people?'* and lists four types of accommodation (Age-restricted general market housing; Retirement living or sheltered housing; **Extra care housing** or housing-with-care; and Residential care homes and nursing homes) which are included in the type of specialist housing which can be provided. However, the PPG is also clear that this list is not exhaustive.
- 2.19 The description of 'Extra care housing or housing-with-care' in PPG is set out below:

- **Extra care housing or housing-with-care:** This usually consists of purpose-built or adapted flats or bungalows with a medium to high level of care available if required,

<sup>3</sup> Paragraph: 001 Reference ID: 63-001-20190626

through an onsite care agency registered through the Care Quality Commission (CQC). Residents are able to live independently with 24-hour access to support services and staff, and meals are also available. There are often extensive communal areas, such as space to socialise or a wellbeing centre. In some cases, these developments are known as retirement communities or villages - the intention is for residents to benefit from varying levels of care as time progresses.

2.20 The PPG (ID: 63-012) is also clear that Local Plans should make provision for older peoples housing, stating "*Plans need to provide for specialist housing for older people **where a need exists**. Innovative and diverse housing models will need to be considered where appropriate.*"

2.21 The move from homes that become increasingly unsuitable for the needs of an ageing older population is now commonly referred to as rightsizing. '**Rightsizing: reframing the housing offer for older people, 2018**' highlights that:

- **Very few older people move home in later life, and most of these moves are not into specialist housing.**
- **Just 3.4% of older people (50+) move home every year in the UK. This is half as many moves compared to the rest of the population.**
- **This is despite just 7% of properties having the most basic accessible features that might enable an older person to age in place.**
- **Only a small minority of moves made by older people are into specialist accommodation, even in the 70+ age cohort.**

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2.22 Notwithstanding the drivers that sit behind 'older mover' decision making – both to move and to stay put - the statistics quoted above point to a severe lack of supply of suitable accommodation to meet the diverse needs and demand of older people. This is inevitable, in the context of older people's needs having emerged (in that they are now better understood and recognised) and evolved in recent times.

2.23 The Rightsizing report proposes the following definition of rightsizing (as distinct from downsizing) as '*an older person's active, positive choice to move home as a way of improving their quality of life*'. This definition reflects the fact that the emerging older persons market must respond to proactive choice that encompasses a broad range of need and demand as

<sup>4</sup> Page 4, Rightsizing: Reframing the housing offer for older people, PHASE @ Manchester School of Architecture, 2018

opposed to the traditional notion of a reactive market. A market that for all the right reasons focused on shelter and basic care, a 'one size fits all' solution, with the unintended consequence of neglecting lifestyle choices. A market that did not anticipate nor respond to the diverse range of need and demand that is increasingly evident in the UK's ageing population.

2.24 This market failure, in the context of both the growing proportion of UK residents in old age and the increasing length of time that population will live in old age, needs to be urgently addressed. Doing so will both improve the quality of life of our older population and help release family homes into the housing market.

2.25 In the Greater Manchester context, with clear resonance for the country as a whole, The Mayor of Greater Manchester sums up the problem and the clear benefits of solving it as follows:

**"In the next 25 years, the proportion of households where the oldest person is aged 85 or over will grow faster than any other age group. And if we do not ensure diverse, accessible, age-friendly homes are available across the city region, increasing numbers of us will find ourselves trapped in homes that are not appropriate for us as we age.**

**In Greater Manchester, 85% of the housing that will exist by 2035 has already been built, much of which does not meet the changing needs or aspirations of our older residents. We need to develop innovative new approaches to ensure that new housing is both attractive and within reach of those who wish to move, and that programmes are in place to support those who want to remain in their current homes.**

**If we deliver a new wave of housing which is adaptable and accessible, within our existing communities and neighbourhoods, we can enable people of all ages and abilities to live the life they want to – and in the homes and places that make them happy."**<sup>5</sup>

2.26 The third '*Housing our Ageing population: Positive Ideas, Making Retirement Living a Positive Choice*' report was published in 2016 by the All-Party Parliamentary Group on Housing and Care for Older People. HAPPI 3 sets the current context for older persons housing in the UK.

2.27 Of particular note are the findings published in HAPPI 3 about the number of older people who wish to move to a smaller home, and findings about the lack of supply to meet the demand for older persons housing.

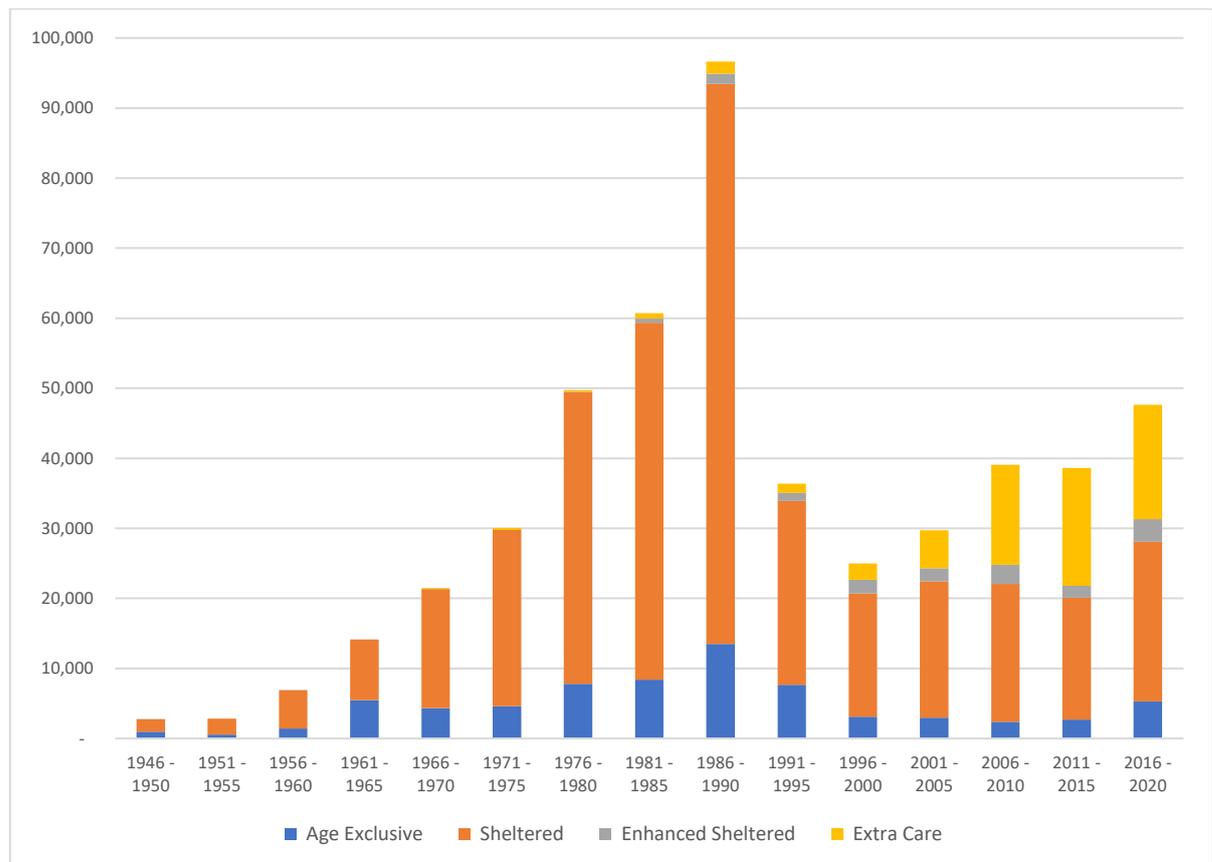
<sup>5</sup> Page 1, Rightsizing: Reframing the housing offer for older people, PHASE @ Manchester School of Architecture, 2018

- 2.28 Quoting market research, HAPPI 3 reports that 8 million people aged over 60, in 7 million homes (30% of total housing stock), are interested in downsizing.<sup>6</sup> However, the stock of specialist housing for older people is estimated to be only 560,000 or 2.4% of total stock.
- 2.29 The limited availability of housing for older people in the UK, in an international context, is clearly illustrated by HAPPI 3, reporting that *"1% of Britons in their 60s are living in tailor-made retirement properties, compared to 17% in the US, and 13% in Australia and New Zealand."*<sup>7</sup>
- 2.30 A national context of undersupply has evidently been compounded by relatively low levels of completions of sheltered and extra care accommodation in last 20 years. Completions have infrequently reached 10,000 units per annum since the early 1990s, whereas in the 1980s, completions frequently exceeded 20,000 units per annum.
- 2.31 The age of the UK stock of specialist housing for older people and the recent emergence of extra care housing can be observed through data provided by the Elderly Accommodation Counsel (EAC), acknowledged to be the most comprehensive and reliable source available. The EAC 2021 Quarter 4 database records about 650,000 units of accommodation within England. About 77% of which (some 500,000 units) includes a build date or a refurbishment date.
- 2.32 Figure 2.1 presents stock by type and 5-year build / refurbishment period, from 1946 to the present (end 2020). Note that whilst the table includes 77% of all stock, this figure is skewed by only 56% of age exclusive housing and 80% of sheltered housing being dated. This contrasts with 88% of enhanced sheltered and 92% of extra care housing.
- 2.33 In broad brush terms, age exclusive and sheltered housing can be characterised as designed or adapted to be old age appropriate, typical provide access to support and social activities, but do not provide care, which until relatively recently was the preserve of care and nursing homes.
- 2.34 In contrast, enhanced sheltered and extra care can be characterised as 'housing with care', the later (extra care) providing care that is registered with the Care Quality Commission (CQC), the same regime that monitors and reports on the quality of care and nursing homes. Whereas enhanced sheltered may provide some personal care (alongside enhanced support when compared to sheltered housing), it is not registered.

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<sup>6</sup> Page 12, Housing our ageing population: Positive Ideas HAPPI 3, Making Retirement Living a Positive Choice, June 2016

<sup>7</sup> Ibid

**Figure 2.1: Specialist Housing for Older People by Build / Refurbishment Date**

Source: EAC housing data UK 2021 Q4

- 2.35 The emergence of housing with care is a modern phenomenon, present in less than 3.5% of specialist housing stock built or refurbished before the Year 2001. Of the small quantity of pre-2001 extra care housing, over 97% is affordable and available for social rent, meaning that less than 200 units of accommodation are available as extra care market housing (predominately leasehold).
- 2.36 The development of extra care housing has accelerated since 2001, such that it accounts for one third of all development between 2001 and the end of 2020. However, only one fifth of the stock of extra care housing built since 2001 is market housing, thus **at the end of 2020, 80% of the UK stock of extra care housing is affordable (95% of which is social rent) and only 20% or 12,100 units are extra care market housing (97% of which is leasehold).**
- 2.37 Across the spectrum of specialist housing for older people (built between 1946 and 2020), about 70% is affordable according to the latest EAC Quarter 4 database. **Because completions have predominantly been rented accommodation, the supply of housing for older people for sale is especially low.** Thus, it is reasonable to conclude, in the context of a prevalence of owner occupation (with no mortgage) amongst people of retirement age,

that older people wishing to purchase housing that meets their needs are especially underprovided for. HAPPI 3 reports as follows:

**Overall there has been a fall in older social rented retirement housing from 81% to 75% of the total, with a corresponding increase in new retirement housing and extra care housing for sale by private developers and social landlords. But since over 70% of those over pension age are owner-occupiers, and so many would wish to continue to own if they downsize, this does suggest that the range of retirement housing models available is still inappropriate as well as insufficient to meet demand.**<sup>8</sup>

- 2.38 The above extract, which is attributed by HAPPI 3 to [REDACTED], Chief Executive of EAC (Elderly Accommodation Counsel) brings us back to the two key beneficial outcomes of enabling the development of homes for older people. The first beneficial outcome is a positive and appropriate response to meeting identified need.
- 2.39 The second beneficial outcome is the impact on the wider housing market, specifically freeing up family homes. Research cited in HAPPI 3 estimates that two thirds of the country's current stock of retirement properties are occupied by people who have moved from homes with 3 or more bedrooms, proving the link between freeing up family homes and developing housing for older people and the clear benefits of encouraging far greater rates of development than the trend rate.
- 2.40 In the context of Government priorities and policy to boost the supply and choice of older persons specialist housing, the specialist housing for older people provision rates (units, by type and tenure, of accommodation per 1,000 population age 75 and over) published in 'Housing in Later Life' (2012) represent an appropriate specialist housing policy benchmark and target. We have used these provision rates in our assessment set out later in this report.
- 2.41 We find support for these rates in the recent (29 November 2021) publication of Mid Sussex District Council's Site Allocations Development Plan Main Modifications. Main Modification 3 (MM3) provides a 'New policy to address the need for specialist accommodation for older people and care homes'.
- 2.42 The MM3 states that "*The modification takes account of the recent appeal decision in relation to a proposal for an extra care development of up to 84 units of Use Class C2 at Albourne. This appeal decision underlines the importance of providing for older persons' housing, both in paragraph 61 of the Framework, and also in the Planning Practice Guidance, which stresses*

<sup>8</sup> Page 13, Housing our ageing population: Positive Ideas HAPPI 3, Making Retirement Living a Positive Choice, June 2016

*that the need to provide housing for older people is critical in view of the rising numbers in the overall population."*

- 2.43 The is a policy which sets out the identified need for leasehold extra care units, based on the Housing in Later Life extra care provision rates, as follows. *"There is an identified need for specialist accommodation for older people comprising at least 665 additional extra care units (Use Class C2) by 2030, of which at least 570 should be leasehold"*<sup>9</sup> Leasehold extra care provision has been specifically referred to in the proposed modification.
- 2.44 Further endorsement of the Housing in Later Life provision rates is given by the Sonning Common Appeal Inspector, [REDACTED] in his Decision dated 25<sup>th</sup> June 2021 ([REDACTED]). Inspired Villages were the appellant in this case. The Inspector concluded as follows in respect of the provision rates used by Inspired Villages expert witness:

**Mr Appleton sets out a provision rate for private extra care of 30 per 1,000 of the 75 and over population in the District based on a total provision of 45 extra care units per 1,000 (4.5%) across both the affordable and private sectors, but split on a ratio of one third for social rented and two thirds for sale. This takes into consideration the research in "More Choice: Greater Voice" and revisions in "Housing in Later Life". I note that the 45 units per 1,000 is to be divided as suggested in order to bring supply into closer alignment with tenure choice among older people. That is 450 units now. Projecting forward, an indicative provision of 633 units of market extra care would be required by 2035. The Council refers to the Oxfordshire's Market Position Statement which assumes a lower need figure for extra care housing but the focus there appears to be on social rented extra care housing. The Council also suggests that the SHMA34 evidence is to be preferred. However, I note that it does not identify figures for extra care, nor does it relate to the present PPG. In my view, Mr Appleton's provision rate is preferred and the need for more private extra care is overwhelming.**

[Appeal ref: 3265861, paragraph 38, our emphasis]

- 2.45 Moreover, [REDACTED] adds that he does not consider the Housing in Later Life provision rates to be especially ambitious and concludes that they should probably be higher.

**In my view, there is a strong case that Mr Appleton's 45 per 1,000 overall, with 30 per 1,000 to market extra care, should be far more ambitious given not only the true tenure split in the District but also what it could mean for the ability to contribute towards addressing the housing crisis. Mrs Smith [for the Council] conceded that the figure of 30 per 1,000 was hardly ambitious and, if anything, was underplaying the scale of the potential need.**

[Appeal ref: 3265861, paragraph 38, our emphasis]

<sup>9</sup> Main Modification 3, New policy to address the need for specialist accommodation for older people and care homes, Suggested Main Modifications to the Site Allocations Development Plan, Mid Sussex District Council, November 2021.

## **Summary**

- 2.46 Meeting the housing needs of the older population is a clear priority of Government as set out in the recent (December 2021) adult social care white paper. This is emphasised by the housing supply policies of the National Planning Policy Framework (NPPF) which requires an assessment of older persons housing need, and the NPPF's supporting Planning Practice Guidance (PPG) which identifies the need to provide housing for older people as 'critical'.
- 2.47 In the context of Government priorities and policy to boost the supply and choice of older persons specialist housing, the specialist housing for older people provision rates (units, by type and tenure, of accommodation per 1,000 population age 75 and over) published in 'Housing in Later Life' (2012) represent an appropriate specialist housing policy benchmark and target.
- 2.48 The 'Housing in Later Life' specialist housing for older people provision rates should be seen as a the basis for a starting point estimate of need in the context of the current state national state of critical need. They are endorsed by the Planning Inspectorate in recent Local Plan examinations and section 78 appeals and are used as the basis for assessing specialist housing need for older people in this report.

### **3.0 LOCAL PLANNING POLICY EVIDENCE RELATING TO HOUSING FOR OLDER PEOPLE**

#### **i) Introduction**

- 3.1 In the context of the national position set out in section 2, this section considers the approach of Hampshire County Council (HCC) and East Hampshire District Council (EHDC) to the issue of older persons housing need.
- 3.2 We begin with a discussion of the general approach across Hampshire before considering the most recent evidence of older persons housing need in the evidence base of EHDC, and EHDC's approach to addressing the need.

#### **ii) Residential and Nursing Market Position Statement (HCC, July 2021)**

- 3.3 This Position Statement published by HCC sets out the priorities of HCC for the residential care home sector over the next five years and takes account of the COVID-19 pandemic and its impact on the sector.
- 3.4 The document includes seven 'commissioning priorities' which HCC seek to focus on over a five-year period. This includes for care home providers to embed the Equality Act (2010) requirements for inclusive and accessible services into their properties.
- 3.5 Furthermore, HCC are to continue with one of the hospital procedures which was enforced by the COVID-19 pandemic. This was the interim 'discharge to assess' bed procedure, which *"removes the decision making from the pressured hospital environment and evidence over the past year shows that it leads to better client outcomes."* HCC concluded *"This way of working supports a better transition into a long-term placement for all parties involved."*<sup>10</sup>
- 3.6 The position statement also states how HCC *"believe that the best environment for most people to live is in their own home"*, whether that is supported by family, the community, the voluntary sector, in Extra Care housing or supported living.<sup>11</sup>
- 3.7 In this context the position statement includes a section on 'Extra Care' housing. HCC state that they *"will continue to commission care services in Extra Care schemes building on existing*

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<sup>10</sup> Page 6, Residential and Nursing Market Position Statement, HCC, July 2021

<sup>11</sup> Page 6, Residential and Nursing Market Position Statement, HCC, July 2021

*strong relationships with social landlords and local housing authorities”<sup>12</sup> and “intend to almost double capacity for Extra Care over the coming years from approximately 800 to 1,500 units.”*

3.8 However, we note that the sole focus of the HCC Position Statement is commissioning *affordable* extra care provision. The need for *market* extra care housing is not discussed.

3.9 The Position Statement points to HCC’s ‘Older Adults’ Extra Care Housing: Ambitions and Opportunities’ brochure which has been published to focus on the Extra Care sector.

### **iii) Older Adults’ Extra Care Housing: Ambitions and opportunities (HCC, 2020)**

3.10 In this document HCC are clear that *“delivery of our ambitious Extra Care Housing programme to allow older adults to maintain independence in a home of their own is one of our top priorities”<sup>13</sup>* (our emphasis).

3.11 To do this, HCC state how they want to do the following:

- encourage a vibrant, stable, diverse, and innovative care provider and **landlord market**;
- **significantly increase** housing numbers through **new development**;
- encourage **innovation** in models of care to meet a wide range of needs.<sup>14</sup>

3.12 HCC state how they would *“particularly want to work with landlords and providers who can construct and operate new affordable Extra Care schemes; and provide innovative services to support Independent Living at Home.”<sup>15</sup>*

3.13 Under a heading of ‘Opportunities’, the document sets out the schemes which have planning permission. However, they emphasise how they are *“keen to speak to housing providers who can bring land opportunities to us.”<sup>16</sup>*

3.14 Notwithstanding HCC’s contention that the delivery of Extra Care housing is a ‘top priority’, the focus remains firmly on affordable provision and engagement with housing associations. It is not within their remit to address the provision of market Extra Care housing.

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<sup>12</sup> Page 8, Residential and Nursing Market Position Statement, HCC, July 2021

<sup>13</sup> Page 2, Older Adults’ Extra Care Housing: Ambitions and opportunities, HCC, 2020

<sup>14</sup> Ibid

<sup>15</sup> Ibid

<sup>16</sup> Page 6, Older Adults’ Extra Care Housing: Ambitions and opportunities, HCC, 2020

3.15 The document also emphasises the quality of development which is expected by stating "*A home for life is a central to our ambitions. Bright, affordable, accessible homes that adopt HAPPI principles, with high quality facilities on site, located close to services and connected to the wider community.*"<sup>17</sup>

**iv) Adults Health and Care Strategy: Our Vision for health and care – a five-year journey 2018-2023 (HCC)**

3.16 HCC's five-year strategy emphasises the success of Extra Care developments whilst also acknowledging that more delivery will be required in the future. To put this into context the Strategy states how 'in five years' time' "*we will have increased the level of older person Extra Care units facilitated or delivered by the County Council to 1,500, doubling the number of units currently.*"<sup>18</sup>

**v) Interim Housing and Economic Development Needs Assessment (HEDNA, December 2018)**

3.17 Turning to the local level of East Hampshire District, the 2018 Interim HEDNA is the most recent evidence base document to incorporate an assessment of older persons housing need (Chapter 11). At the outset it is important to note how this evidence is now approximately three years old and requires an update.

3.18 The introduction to the evidence set out in Chapter 11 identifies how "*A key driver of change in East Hampshire over the plan period is expected to be the growth in the population of older persons (our emphasis).*"<sup>19</sup> The same paragraph moves on to acknowledge how in East Hampshire District "*Many older households are equity rich and able to exercise housing choice (our emphasis).*"<sup>20</sup> The HEDNA therefore acknowledges how there is likely to be an increasing need for specialist housing, and in its 'key findings' on older persons need states how there is "*A need for enhanced sheltered and extra-care housing in both the rented and leasehold sectors (and leasehold sheltered/retirement housing).*"<sup>21</sup> This need for market extra care provision is only emphasised by the 'equity rich' character of many households, who will not be eligible for affordable extra care provision.

<sup>17</sup> Page 8, Older Adults' Extra Care Housing: Ambitions and opportunities, HCC, 2020

<sup>18</sup> Page 11, Adults Health and Care Strategy: Our Vision for health and care – a five-year journey 2018-2023, HCC

<sup>19</sup> Paragraph 11.3, page 168, Interim Housing and Economic Development Needs Assessment, December 2018

<sup>20</sup> Ibid

<sup>21</sup> Paragraph 11.57, page 185, Interim Housing and Economic Development Needs Assessment, December 2018

### Baseline data

- 3.19 Chapter 11 of the HEDNA then moves on to consider the baseline population of East Hampshire District. However, this is taken from the 2017 Mid-Year Population Estimates (MYPEs) published by the Office for National Statistics (ONS). There have been three ONS MYPE updates in the intervening period, with 2020-based MYPEs the most recent.
- 3.20 The subsequent section of Chapter 11 then considers ONS Sub-National Population Projections (SNPP), using the 2016-based projection series (May 2018). A more recent 2018-based SNPP was published in March 2020, and we consider those projections in the following section of this report.
- 3.21 Notwithstanding this the HEDNA identified how the 2016-based ONS SNPP projected an increase of 49.2% in the 65+ population of East Hampshire, compared with 43.0% in England.<sup>22</sup>
- 3.22 However, linked to overall housing delivery of 608 dwellings per annum (the Standard Method minimum housing need calculation used in the HEDNA), the HEDNA determines that the 65+ population would increase by 54.5%.
- 3.23 Figures 11.1 and 11.2 of the HEDNA provide analysis of older persons housing tenure in East Hampshire, compared with Hampshire, the South East, and England. This is based on the 2011 Census and shows how owner-occupied (no mortgage) occupants accounted for 74.9% of East Hampshire's population compared with Hampshire (73.8%), the South East (71.7%), and England (67.4%).<sup>23</sup>
- 3.24 East Hampshire (7.3%) also has a higher proportion of older person households which are owner-occupied (with mortgage) than Hampshire (6.7%), the South East (6.8%), and England (6.2%)<sup>24</sup> according to the 2011 Census data. It is assumed this is based on the over 65 population due to previous sections of the HEDNA's Chapter 11 being based on this age group, although the 'Characteristics of Older Person Households' section of chapter 11 doesn't confirm this.
- 3.25 The HEDNA moves on to consider those people in East Hampshire who have a 'Long-Term Health Problem or Disability' (LTHPD). The HEDNA draws this data from the 2011 Census. Table 11.7 of the HEDNA presents this information, showing how East Hampshire District appears to have a lower proportion of 'households containing someone with a health problem' and

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<sup>22</sup> Tables 11.3 and 11.4, page 170, Interim Housing and Economic Development Needs Assessment, December 2018

<sup>23</sup> Figure 11.1, page 173, Interim Housing and Economic Development Needs Assessment, December 2018

<sup>24</sup> Ibid

'population with a health problem' than other comparator areas including Hampshire, the south east, and England.

- 3.26 In section 5 of this report, we consider this factor and others using data from the 'Projecting Older People Population Information System' (POPPI) which incorporates the 2011 Census data and other sources of information.
- 3.27 The HEDNA projects that people with a LTHPD will increase by 5,500-6,800 people (a 28%-35% increase) between 2017 and 2036. This range is based on the 2016-based SNPP and the provision of 608 dpa respectively.

#### Assessment of older persons housing need

- 3.28 In the context of this background, Chapter 11 of the HEDNA then considers what the older persons' housing need will be in East Hampshire District between 2017 and 2036.
- 3.29 In calculating the need for older persons accommodation, the HEDNA uses the provision rates (provision per 1,000 population aged 75+) published within the Housing LIN 'More Choice Greater Voice' (2008) for each of the types of older persons accommodation. The Elderly Accommodation Counsel define these categories as age restricted housing, sheltered housing, enhanced sheltered housing, and extra care housing. The Counsel's definitions for these types of accommodation are set out below. It should be noted that Inspired Villages provide Extra care market housing.
- **Age exclusive housing:** Housing designed, built and let/sold exclusively to older people (typically 50+ or 55+), but without the supportive on-site management characteristic of sheltered housing. Usually also without any shared facilities except perhaps a garden;
  - **Retirement/sheltered housing:** A group of self-contained flats or bungalows reserved for people over the age of 55 or 60; some shared facilities such as residents' lounge, garden, guest suite, laundry; plus on-site supportive management. A regularly visiting scheme manager service may qualify as long as s/he is available to all residents when on site. An on-call-only service does not qualify a scheme to be classified as retirement/sheltered housing. Developments usually built for either owner occupation or renting on secure tenancies;
  - **Enhanced sheltered housing:** Sheltered housing with additional services to enable older people to retain their independence in their own home for as long as possible. Typically there may be 24/7 (non-registered) staffing cover, at least one daily meal will

be provided and there may be additional shared facilities. Also called assisted living and very sheltered housing.

- **Extra care housing:** Schemes where a service registered to provide personal or nursing care is available on site 24/7. Typically at least one daily meal will be provided and there will be additional shared facilities. Some schemes specialise in dementia care, or may contain a dedicated dementia unit.

- 3.30 The HEDNA identifies how updated provision rates were published in 'Housing in Later Life' (2012). However, the HEDNA comments that "*A further Housing LIN report (Housing in Later Life) was published in 2012, and contained a further set of suggested prevalence rates; however, these figures were rejected as not being 'substantiated' and have not therefore been considered in the analysis below.*"<sup>25</sup>
- 3.31 The HEDNA therefore uses the rates of the 2008 report and rates published in a 2016 review. The 'Housing in Later Life' rates (2012) are not used. For the reasons set out in Section 2 of this report, Barton Willmore's preference is to use the 'Housing in Later Life' provision rate of 180 units per 1,000 of population for 'sheltered housing' (termed housing with support in the HEDNA). The HEDNA has used the 'More Choice Greater Voice' (2008) rate of 125 per 1,000 of population.
- 3.32 In respect of Enhanced Sheltered Housing, the HEDNA groups this together in a category termed 'housing with care' (including Extra Care with Enhanced Sheltered), however in doing so it does not adopt the more recent provision rates contained within 'Housing in Later Life', which equates to 65 units per 1,000 (45 units for extra care, and 20 units for enhanced sheltered). Instead, the HEDNA utilises a provision rate of 45 units per 1,000 (75+) made up of 20 units per 1,000 for enhanced sheltered and 25 per 1,000 for extra care.
- 3.33 In summary the combined provision rates of all types of older persons housing assumed within the HEDNA totals 170 units per 1,000 people aged 75+. This compares with an equivalent combined provision rate of 245 units per 1,000 people aged 75+ contained within Housing in Later Life.
- 3.34 The HEDNA also concludes how "*there may currently be an oversupply of rented sheltered/retirement housing but a notable shortfall in the leasehold sector*" (our emphasis).<sup>26</sup>

<sup>25</sup> Paragraph 11.32, page 178, Interim Housing and Economic Development Needs Assessment, December 2018

<sup>26</sup> Paragraph 11.36, page 178, Interim Housing and Economic Development Needs Assessment, December 2018

- 3.35 Having considered need based on the 'More Choice Greater Voice' rates, the HEDNA also addresses the need based on the 2016 Shop@ Analysis Tool Review. This results in a provision rate (145 units per 1,000 of 75+ population) lower than the 'More Choice Greater Voice' (170 units per 1,000 of 75+ population).
- 3.36 Specifically, this approach significantly reduces the provision rates for 'housing with care', from 15 (rented) and 22 (leasehold) to 5 (rented) and 12 (leasehold).
- 3.37 Table 3.1 (below) is drawn from Table 11.16 of the HEDNA and summarises the results of the HEDNA's older persons housing need calculations based on the 2016-based ONS SNPP and the dwelling-led scenario of 608 dpa, against the two provision rate scenarios (More Choice Greater Voice and Shop@ Analysis Review).

**Table 3.1: Older persons housing need (units per annum) 2017-2036**

		Housing LIN Shop@		Shop@ Review	
		2016-based SNPP	Linked to 608 dpa	2016-based SNPP	Linked to 608 dpa
<b>Housing with support</b>	Rented	9	10	11	12
	Leasehold	48	51	46	49
<b>Housing with care</b>	Rented	18	19	5	6
	Leasehold	23	24	12	12

Source: Table 11.16, page 181, Interim Housing and Economic Development Needs Assessment (HEDNA, December 2018)

- 3.38 Notwithstanding this analysis, the HEDNA does state that the *"figures provided above should be treated as indicative as there is no nationally agreed set of prevalence rates (or how these might be adjusted for local factors)."*
- 3.39 Importantly, the HEDNA also states *"The Council should consider reviewing this evidence if a specific application comes in for older persons housing, where this is supported by its own needs assessment"*<sup>27</sup> (our emphasis).
- 3.40 In concluding however, the HEDNA states that a 'key finding' of the analysis is *"A need for enhanced sheltered and extra-care housing in both the rented and leasehold sectors (and leasehold sheltered/retirement housing)"* and concludes *"the need for leasehold (market) housing with care (Extra-care/Enhanced sheltered) is estimated to be in the range of 219 to 453 dwellings in the period to 2036 (12-24 per annum) – it is considered that these will be in a C3 use class."*<sup>28</sup> The contention that the dwellings should be in the C3 use class is incorrect as evidenced in several section 78 appeal decisions. The correct Use Class is C2.

<sup>27</sup> Paragraph 11.42, page 178, Interim Housing and Economic Development Needs Assessment, December 2018

<sup>28</sup> Paragraph 11.57, page 185, Interim Housing and Economic Development Needs Assessment, December 2018

**vi) Summary**

- 3.41 This section has identified reports and evidence based documents addressing older persons specialist housing need published by Hampshire County Council (HCC) and East Hampshire District Council (EHDC), with specific reference to the type of development proposed by Inspired Villages, i.e. Extra Care market housing.
- 3.42 HCC's 'Residential and Nursing Market Position Statement' (July 2021) identifies the need for Extra Care housing across the County. However, the focus of this document is affordable Extra Care, the provision of market extra care being outside the Position Statement's scope.
- 3.43 The December 2018 HEDNA applies the housing provision rates for Extra Care and other tenures published in the 2008 'More Choice Greater Voice' report. Barton Willmore find that the provision rates published in the 2012 'Housing in Later Life' report should be preferred and note that they have been endorsed by the Planning Inspectorate at Local Plan examination and at appeal.
- 3.44 Nevertheless, on the basis of relatively low provision rates, the HEDNA concludes that **there is a "notable shortfall in the leasehold sector" for sheltered/retirement housing and "the need for leasehold (market) housing with care (Extra-care/Enhanced sheltered) is estimated to be in the range of 219 to 453 dwellings in the period to 2036 (12-24 per annum)".**
- 3.45 The HEDNA states that there are no nationally agreed set of provision rates for the assessment of older persons housing need, and **"The Council should consider reviewing this evidence if a specific application comes in for older persons housing, where this is supported by its own needs assessment."**

## 4.0 EAST HAMPSHIRE DISTRICT: DEMOGRAPHY AND TENURE OF THE OLDER POPULATION

### i) Introduction

4.1 This section of the report provides a summary of the demographics and housing tenure of East Hampshire's population in the 65 and over category. We have utilised the 'Projecting Older People Population Information' (POPPI) database, maintained by Oxford Brookes University and the Institute of Public Care for this information.

### ii) Demographics

4.2 The following Table 4.1, sourced from POPPI, summarises the 2018-based sub national population projections for East Hampshire, and estimates that the total population over 65 years of age is projected to grow by 42% over the period 2020 - 2040. To put this into perspective the growth across England over the same period is projected to be 8%.

**Table 4.1: Population Aged 65 Plus, Projected to 2040, East Hampshire**

	2020	2025	2030	2035	2040
People Aged 65-69	7,100	8,100	9,200	9,100	8,600
People Aged 70-74	7,900	6,900	7,900	9,000	9,000
People Aged 75-79	5,800	7,500	6,600	7,600	8,700
People Aged 80-84	4,200	5,100	6,600	5,900	6,800
People Aged 85-89	2,600	3,200	3,900	5,100	4,600
People Aged 90 and over	1,700	2,000	2,400	3,000	3,900
<b>Total Population 65 and over</b>	<b>29,300</b>	<b>32,800</b>	<b>36,600</b>	<b>39,700</b>	<b>41,600</b>

Source: POPPI, Figures may not sum due to rounding

4.3 Table 4.2 summarises the absolute change in population over 65 years of age by a 5-year cohort from 2020 onwards. In summary, it can be seen that the population age 75-79 will experience the greatest absolute increase of 2,900 people by 2040, followed by those aged 80-84 increasing by 2,600 people and those aged 90 and over increasing by 2,200 people.

**Table 4.2: Population Aged 65 Plus, Projected to 2040, East Hampshire, Absolute Change From 2020**

	2020	2025	2030	2035	2040
People Aged 65-69	-	1,000	2,100	2,000	1,500
People Aged 70-74	-	-1,000	0	1,100	1,100
People Aged 75-79	-	1,700	800	1,800	2,900
People Aged 80-84	-	900	2,400	1,700	2,600
People Aged 85-89	-	600	1,300	2,500	2,000
People Aged 90 and over	-	300	700	1,300	2,200
<b>Total Population 65 and over</b>	<b>-</b>	<b>3,500</b>	<b>7,300</b>	<b>10,400</b>	<b>12,300</b>

Source: POPPI, Figures may not sum due to rounding

4.4 Table 4.3 shows the projected population of those aged 65 and over in addition to those aged 85 and over relative to total population change within East Hampshire. In summary it is clear from the latest population projections that the population aged 65 and over (typically the point of retirement), and the population aged 85 and over (typically the point at which specialised accommodation services are needed), both increase at a relatively greater rate than the overall population of the District.

**Table 4.3: Total Population Aged 65 Plus Relative to Total Population East Hampshire**

	2020	2025	2030	2035	2040
Total Population	122,600	126,400	129,200	131,300	133,300
Population Aged 65 and over	29,300	32,800	36,600	39,700	41,600
Population Aged 85 and over	4,300	5,100	6,300	8,000	8,500
<b>Population Aged 65 and Over as a Proportion of the Total Population</b>	<b>24%</b>	<b>26%</b>	<b>28%</b>	<b>30%</b>	<b>31%</b>
<b>Population Aged 85 and Over as a Proportion of the Total Population</b>	<b>4%</b>	<b>4%</b>	<b>5%</b>	<b>6%</b>	<b>6%</b>

Source: POPPI, Figures may not sum due to rounding

4.5 Table 4.4 below summarises the equivalent relative growth in the population aged 65 over as well as those aged 85 and over within England. This shows that the proportion of the population of older age groups within East Hampshire, currently and at 2040 is greater than the overall proportions within England.

**Table 4.4: Total Population Aged 65 Plus Relative to Total Population England**

	2020	2025	2030	2035	2040
Total Population	56,678,500	58,060,200	59,181,800	60,183,900	61,157,900
Population Aged 65 and over	10,505,500	11,449,400	12,696,900	13,815,400	14,527,100
Population Aged 85 and over	1,417,000	1,573,300	1,810,000	2,246,200	2,411,300
<b>Population Aged 65 and Over as a Proportion of the Total Population</b>	<b>19%</b>	<b>20%</b>	<b>21%</b>	<b>23%</b>	<b>24%</b>
<b>Population Aged 85 and Over as a Proportion of the Total Population</b>	<b>3%</b>	<b>3%</b>	<b>3%</b>	<b>4%</b>	<b>4%</b>

Source: POPPI, Figures may not sum due to rounding

- 4.6 In summary, the population of East Hampshire aged 65 and over is projected to grow at a substantial rate (+42%), increasing by some +13,200 people over the period to 2040, and at a greater rate than the total population of the Borough.
- 4.7 The population aged 85 and over will also increase significantly (+77% of those aged 85-89 and +129% of those aged 90 and over), impacting on the demand for specialised accommodation and care services, and in particular Registered Care Homes if alternative accommodation options are not provided for at an earlier life stage.

### iii) Tenure

- 4.8 This sub-section summarises the tenure profile of those residents of East Hampshire aged 65 years of age and over. It demonstrates that of those in early older age, only 15% occupy homes in a tenure other than home ownership, increasing to 24% in those in older cohorts.
- 4.9 It is imperative therefore that suitable choices exist for those seeking specialised accommodation which provides for the overwhelming tenure profile of those aged over 65 years of age – that being home ownership.

**Table 4.5: Proportion of Population Aged 65 Plus, by Tenure, East Hampshire**

	People Aged 65-74	People Aged 75-84	People Aged 85 and over
Rented from Council	1.22%	1.67%	2.06%
Other Social Rented	8.53%	10.12%	13.86%
Owned	84.80%	82.94%	75.51%
Private Rented or Living Rent Free	5.56%	5.26%	8.57%

Figures may not sum due to rounding

Source: POPPI

4.10 Table 4.6 summarises, for comparative purposes, the tenure profile of those aged 65 years and over within England, demonstrating the significantly higher levels of home ownership which exist in older age groups in East Hampshire.

**Table 4.6: Proportion of Population Aged 65 Plus, By Tenure, England**

	People Aged 65-74	People Aged 75-84	People Aged 85 and over
Rented from council	9.54%	10.42%	11.99%
Other social rented	7.75%	8.79%	11.66%
Owned	76.34%	74.84%	68.20%
Private rented or living rent free	6.36%	5.95%	8.14%

Figures may not sum due to rounding  
Source: POPPI

#### **iv) Summary**

4.11 In summary it is clear from the significantly greater levels of owner occupation amongst older people in East Hampshire compared with the England average shown in Tables 4.5 and 4.6 that there is a clear requirement for specialised accommodation providers to respond to the needs and aspirations of older owner occupiers.

4.12 The population age 65 and over is projected to grow by 42% in East Hampshire, compared with only 8% nationally (England) between 2020 and 2040. In East Hampshire, this equates to a total increase of 12,300 people over the next 20 years and the share of the population age 65 and over increasing from 24% in 2020 to 31% in 2040. Whereas across England, the share of the population age 65 and over will increase from 19% to 24% over the same period.

4.13 Analysis of tenure reveals a significantly higher proportion of owner-occupiers in East Hampshire (+8%) in each of the 65-74, 75-84, and 85 and over age groups.

## 5.0 PROFILE OF OLDER PEOPLE'S HEALTH AND WELLBEING

5.1 This section of the report uses POPPI data to provide some additional detail in respect of East Hampshire's over 65 population. Specifically, the data analysed concerns factors affecting health in the 65+ age group, and the ability of the population to live independently without some form of care. This analysis provides some context for how specialist housing need is likely to increase in the future.

5.2 Table 5.1, drawn from POPPI, summarises the modelled number of people in older age who are **likely to be unable to manage at least one domestic task**. It is clear that the volume of people experiencing difficulty increases with age and will increase further in future years due to population growth in older age groups. In summary the volume of people experiencing difficulties will increase by +51% over the period to 2040.

**Table 5.1: People Aged 65 Plus Unable to Manage at Least One Domestic Task on their own, Projected to 2040, East Hampshire.**

	2020	2025	2030	2035	2040
Males aged 65-69 who need help with at least one domestic task	525	600	675	660	630
Males aged 70-74 who need help with at least one domestic task	722	627	722	817	798
Males aged 75-79 who need help with at least one domestic task	729	945	837	972	1,080
Males aged 80 and over who need help with at least one domestic task	1,155	1,419	1,848	1,980	2,211
Females aged 65-69 who need help with at least one domestic task	684	779	893	893	836
Females aged 70-74 who need help with at least one domestic task	966	828	943	1,081	1,104
Females aged 75-79 who need help with at least one domestic task	1,054	1,360	1,190	1,360	1,564
Females aged 80 and over who need help with at least one domestic task	2,750	3,245	4,070	4,345	4,730
<b>Total Population Aged 65 and Over who Need Help with at Least One Domestic Task</b>	<b>8,585</b>	<b>9,803</b>	<b>11,178</b>	<b>12,108</b>	<b>12,953</b>

Figures may not sum due to rounding; Source: POPPI

5.3 Table 5.2 below summarises the modelled number of people in older age likely to be unable to manage at least one personal care task, increasing by +49% over the period to 2040.

5.4 Activities of Daily Living (ADLs) are activities relating to personal care and mobility about the home that are basic to daily living, and include:

- Having a bath or shower;
- Getting up and down stairs;
- Getting around indoors;
- Dressing or undressing;
- Getting in and out of bed;
- Washing face and hands;
- Eating, including cutting up food;
- Taking medicine.

**Table 5.2: People Aged 65 Plus Unable to Manage at Least One Personal Care Task on their own, Projected to 2040, East Hampshire.**

	2020	2025	2030	2035	2040
Males aged 65-69 who need help with at least one self-care activity	560	640	720	704	672
Males aged 70-74 who need help with at least one self-care activity	798	693	798	903	882
Males aged 75-79 who need help with at least one self-care activity	756	980	868	1,008	1,120
Males aged 80 and over who need help with at least one self-care activity	1,225	1,505	1,960	2,100	2,345
Females aged 65-69 who need help with at least one self-care activity	792	902	1,034	1,034	968
Females aged 70-74 who need help with at least one self-care activity	1,008	864	984	1,128	1,152
Females aged 75-79 who need help with at least one self-care activity	899	1,160	1,015	1,160	1,334
Females aged 80 and over who need help with at least one self-care activity	2,450	2,891	3,626	3,871	4,214
<b>Total Population Aged 65 and Over who Need Help with at Least One Self-Care Activity</b>	<b>8,488</b>	<b>9,635</b>	<b>11,005</b>	<b>11,908</b>	<b>12,687</b>

Figures may not sum due to rounding; Source: POPPI

5.5 Table 5.3 models the number of people aged 65 and over likely to suffer from a limiting long-term illness whose day-to-day activities are limited either a little or a lot. In summary the volume of people suffering from a limiting long-term illness whose day-to-day activities are limited a lot is likely to increase by +59% over the period to 2040, an increase of some +2,851 people. When combined with those aged 65 and over with a limiting long-term illness whose day-to-day activities are limited a little the total increases to +3,134.

**Table 5.3: People Aged 65 Plus with Limiting Long Term Illness, By Age, Projected to 2040, East Hampshire.**

	2020	2025	2030	2035	2040
People aged 65-74 whose day-to-day activities are limited a little	2,667	2,667	3,041	3,218	3,130
People aged 75-84 whose day-to-day activities are limited a little	2,893	3,645	3,819	3,906	4,485
People aged 85 and over whose day-to-day activities are limited a little	1,106	1,312	1,620	2,058	2,186
<b>Total Population Aged 65 and Over with a Limiting Long-Term Illness whose Day-To-Day Activities are Limited a Little</b>	<b>6,666</b>	<b>7,624</b>	<b>8,480</b>	<b>9,182</b>	<b>9,800</b>
People aged 65-74 whose day-to-day activities are limited a lot	1,269	1,269	1,447	1,532	1,489
People aged 75-84 whose day-to-day activities are limited a lot	1,951	2,459	2,576	2,634	3,025
People aged 85 and over whose day-to-day activities are limited a lot	1,595	1,892	2,337	2,968	3,153
<b>Total Population Aged 65 and Over with a Limiting Long-Term Illness whose Day-To-Day Activities are Limited a Lot</b>	<b>4,816</b>	<b>5,620</b>	<b>6,360</b>	<b>7,133</b>	<b>7,667</b>

Figures may not sum due to rounding; Source: POPPI

5.6 Table 5.4 summarises the modelled number of people likely to be unable to manage at least one mobility activity, totalling 5,546 people aged over 65. It is projected that this figure will increase by +57% by 2040, amounting to an additional +3,161 people.

**Table 5.4: People Aged 65 Plus Unable to Manage at Least One Mobility Activity on Their Own, By Age, Projected to 2040, East Hampshire.**

<b>Mobility - All people</b>	2020	2025	2030	2035	2040
People aged 65-69 unable to manage at least one activity on their own	604	689	783	775	732
People aged 70-74 unable to manage at least one activity on their own	1,052	906	1,036	1,182	1,188
People aged 75-79 unable to manage at least one activity on their own	975	1,260	1,107	1,272	1,446
People aged 80-84 unable to manage at least one activity on their own	1,020	1,226	1,613	1,414	1,631
People aged 85 and over unable to manage at least one activity on their own	1,895	2,250	2,760	3,505	3,710
<b>Total Population aged 65 and Over Unable to Manage at Least One Activity on Their Own</b>	<b>5,546</b>	<b>6,331</b>	<b>7,299</b>	<b>8,148</b>	<b>8,707</b>

Figures may not sum due to rounding

Source: POPPI

5.7 Table 5.5 summarises predicted levels of dementia in those aged over 65 years of age within East Hampshire. The predications provided by POPPI demonstrate over a 70% increase in rates

of dementia cases over the course of the period to 2040 placing an increased pressure on the type of accommodation and care services required to meet this potential demand.

**Table 5.5: People Aged 65 Plus Predicted to have Dementia, By Age, Projected to 2040, East Hampshire.**

	2020	2025	2030	2035	2040
People aged 65-69 predicted to have dementia	117	134	152	151	142
People aged 70-74 predicted to have dementia	244	210	241	274	274
People aged 75-79 predicted to have dementia	348	450	395	455	516
People aged 80-84 predicted to have dementia	466	565	742	653	752
People aged 85-89 predicted to have dementia	469	580	701	918	827
People aged 90 and over predicted to have dementia	530	589	743	919	1,190
<b>Total Population Aged 65 and Over Predicted to have Dementia</b>	<b>2,175</b>	<b>2,528</b>	<b>2,974</b>	<b>3,369</b>	<b>3,702</b>

Figures may not sum due to rounding

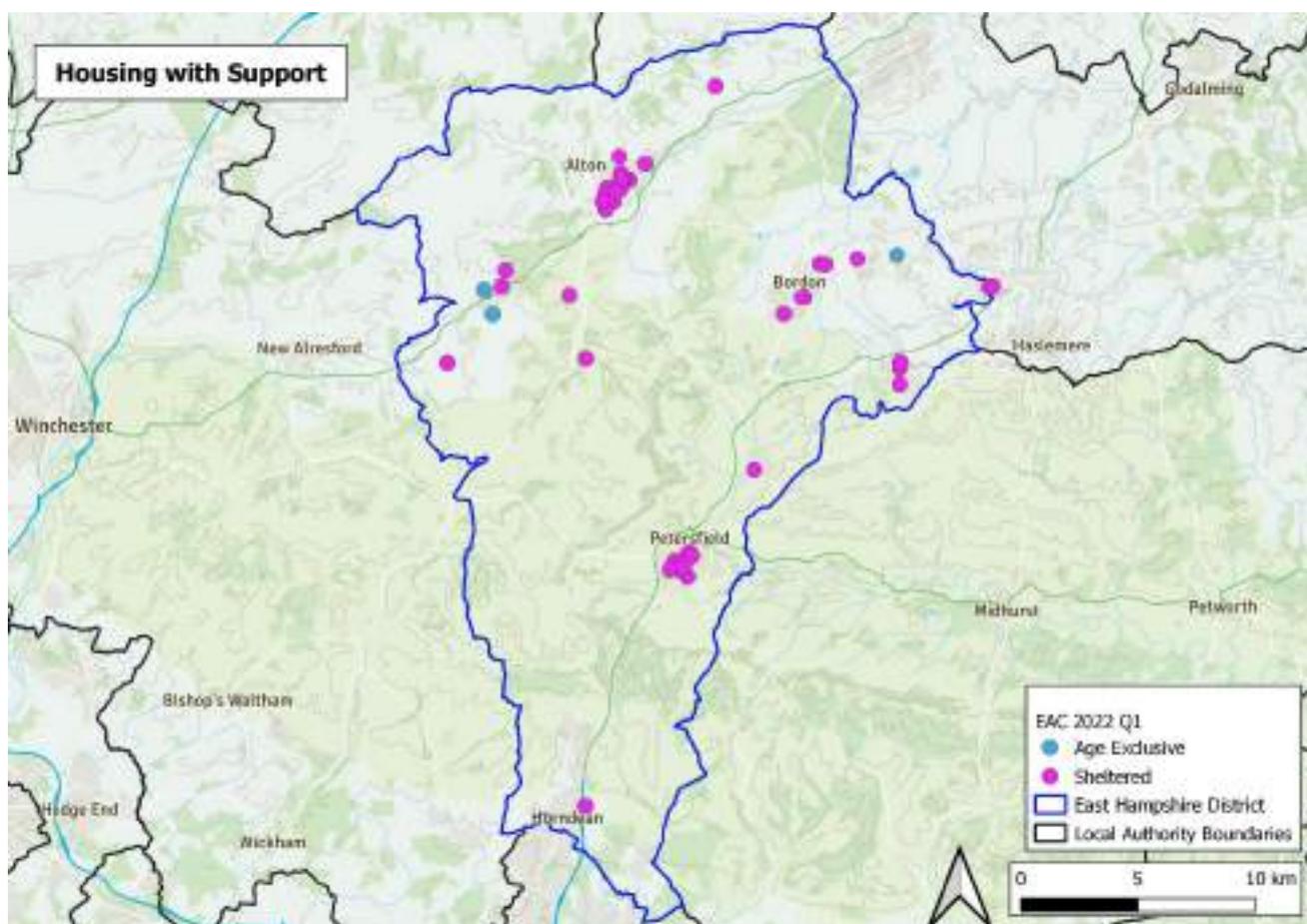
Source: POPPI

- 5.8 In summary, the projected increase in the number of people unable to undertake one or more domestic or personal care tasks, may contribute to an additional demand for specialised accommodation, directly impacting on demand for care home places. There is also a predicted increase of over 70% in those suffering from dementia in those aged 65 and over within East Hampshire (over the period to 2040).
- 5.9 Specialist older people's housing such as that provided in Extra Care developments offer a flexible response to the care and support needs of individuals which change over time, increasing the range of options available to those seeking specialised accommodation.

## 6.0 CURRENT SUPPLY OF SPECIALISED ACCOMMODATION FOR OLDER PEOPLE WITHIN EAST HAMPSHIRE DISTRICT

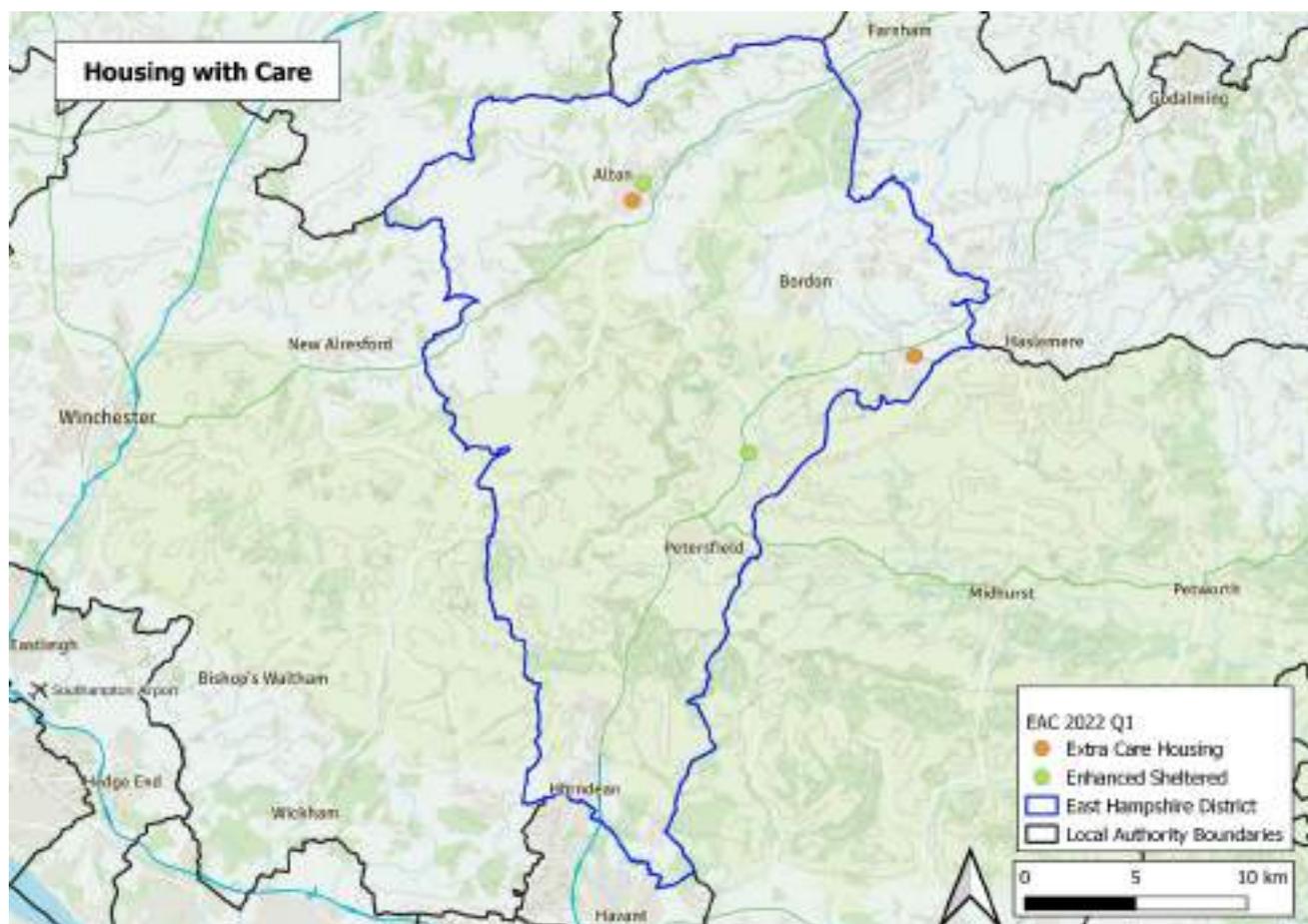
- 6.1 This section of the Report reviews the existing supply of older people’s accommodation within East Hampshire District, relative to the older age population. Supply data, including tenure is sourced from the Elderly Accommodation Counsel’s Q1 2022 database release. Where a scheme operates across multiple tenures, and in the absence of a stated provision by tenure, the total number of units within a scheme have been proportioned equally by each of the tenures available on site. We append the list of specialist older persons housing within East Hampshire District in Appendix 1 of this Report.
- 6.2 Figure 6.1 displays the current existing provision of specialist older persons accommodation with support (i.e., age exclusive and sheltered) within the District. Figure 6.2 shows the housing with care (i.e., enhanced sheltered and extra care).

**Figure 6.1: Existing Forms of Specialist Older Persons Accommodation with Support in East Hampshire District**



Source: EAC, Q1 2022

**Figure 6.2: Existing Forms of Specialist Older Persons Accommodation with Care in East Hampshire District**



Source: EAC, Q1 2022

- 6.3 Figures 6.2 highlights the minimal provision of housing with care in the District.
- 6.4 According to the Elderly Accommodation Counsel, there exists a total of 1,695 units of specialist older persons housing within East Hampshire District, including age exclusive housing, sheltered housing, enhanced sheltered housing and extra care housing.
- 6.5 This figure exceeds the figure of 1,302 units quoted within the HEDNA.<sup>29</sup>
- 6.6 As summarised in Table 6.1 current supply therefore equates to a combined provision rate across all tenures and all property type of 120 units per 1,000 people aged 75+. It is also clear that the existing supply of specialist accommodation for older people is concentrated within those scheme types offering lower levels of care/ monitoring, with significantly lower levels of provision in extra care and enhanced sheltered housing at present.

<sup>29</sup> Table 11.18, page 183, Interim Housing and Economic Development Needs Assessment (HEDNA), East Hampshire District Council, December 2018

**Table 6.1: Provision of Existing Places for Older People in East Hampshire District**

	Existing Number of Units/ Places	Per 1,000 of the Population 75 Years and Over (14,192 in 2020)
Age Exclusive Housing to rent	32	2
Sheltered Housing to rent	661	47
Enhanced Sheltered Housing to rent	0	0
Extra Care Housing to rent	0	0
<b>Total housing to rent - all types</b>	<b>693</b>	<b>49</b>
Age Exclusive for leasehold	59	4
Sheltered Housing for leasehold	651	46
Enhanced Sheltered Housing for leasehold	52	4
Extra Care Housing for leasehold	240	17
<b>Total housing for leasehold - all types</b>	<b>1,002</b>	<b>71</b>
<b>Total housing - all tenures</b>	<b>1,695</b>	<b>119</b>

Figures may not sum due to rounding  
Source: EAC, Q1 2022

6.7 Table 6.2 below summarises the existing (and planned) provision of specialist housing units by affordable and market tenure and it is clear that despite the overwhelming tenure profile of older residents in East Hampshire being owner occupiers (c.79% aged 75+, some 11,300 people), 59% of existing units are available on a as market, predominately leasehold accommodation.

**Table 6.2: Summary of Older Persons Housing by Tenure**

Type	Affordable		Market	
	Predominately Social Rent	Predominately Shared Ownership	Predominately Market Rent	Predominately Leasehold
Age Exclusive	<b>32</b> (35%)	0 (0%)	0 (0%)	<b>59</b> (65%)
Sheltered	<b>661</b> (50%)	0 (0%)	10 (1%)	<b>651</b> (49%)
Enhanced Sheltered	0 (0%)	0 (0%)	0 (0%)	<b>52</b> (100%)
Extra Care	0 (0%)	0 (0%)	0 (0%)	<b>240</b> (100%)
<b>Total</b>	<b>693</b> (41%)	0	0	<b>1,002</b> (59%)

Source: EAC, Q1, 2022

6.8 In summary, after accounting for all forms of retirement and sheltered housing (including Age Exclusive, Sheltered, Enhanced Sheltered and Extra Care) we find that the current rate of provision in East Hampshire (120 per 1,000 population aged 75+) is **lower** than the provision reported in the HEDNA (between 140 and 170 per 1,000 of population aged 75+) and the national provision rate (153 per thousand). Of the 1,002 units market tenure accommodation, 240 units (2 schemes, one in Alton and the other Liphook) are provided as Extra Care housing.

## **7.0 CURRENT AND FUTURE SPECIALIST HOUSING NEED FOR OLDER PEOPLE WITHIN EAST HAMPSHIRE DISTRICT**

- 7.1 The Housing Learning Improvement Network (Housing LIN) published Housing in Later Life in 2012 which updated guidance and specialist housing provision rates previously issued by Housing LIN in its More Choice Greater Voice publication (in 2008).
- 7.2 The More Choice Greater Voice provision rates were arrived at by an examination of current, actual provision rates adjusted to reflect policy aspirations at the time. At that time, actual provision had recently been established by the Royal Commission on Long-term care as 136 units of sheltered accommodation per thousand of those seventy-five years of age and above.
- 7.3 The desire to divert people from residential care to the then emerging forms of Extra Care resulted in the inclusion of a target provision rate for this new form of specialist housing. In total, More Choice Greater Voice set a provision rate of 180 units of specialist housing for older people per thousand of the whole local population who are seventy-five years of age or more.
- 7.4 Housing in Later Life, published four years after More Choice Greater Voice, was intended as an update for More Choice Greater Voice. The update included modifications to the published specialist housing provision rates to reflect trends observed between 2008 and 2012.
- 7.5 Continuing high demand for leasehold retirement housing resulted in a modification in that provision rate. Increasing provision and acceptance of Extra Care, especially in the private sector, resulted in an increased Extra Care provision rate.
- 7.6 Thus, Housing in Later Life proposed an overall provision rate to 251 units per thousand of the population seventy-five years of age or more. Of which 45 units per thousand of the population 75 years of age and over relate to Extra Care, divided one third/two-thirds between social rented and ownership tenures. When we set that alongside the current national average which sees 91 people per thousand 75 years of age or over in Registered Care Homes the Extra Care provision rate seems a modest aspiration.
- 7.7 Our calculation of housing need for older people employs the provision rates published in Housing in Later Life, applied as a 'target provision rate' to the latest estimate of East Hampshire's population (mid year 2020) to arrive at the specialist housing requirement for older people, by type and tenure.

- 7.8 The 'current shortfall' by type and tenure is calculated by subtracting the 'current requirement' from 'current supply' (as described in Section 6). Next, the 'additional future requirement' is arrived at by applying the 'target provision rate' to projected population change, mid year 2020 to mid year 2036, using the 2018 based population projections.
- 7.9 Finally, the 'current shortfall and future requirement' by summing 'current shortfall' and 'additional future requirement'. This total requirement (having regard to the urgency with which the current shortfall should be addressed) provides a preferred alternative to the assessment presented in the HEDNA, and a target, by type and tenure, to guide decision taking in East Hampshire.
- 7.10 Table 7.1, 7.2 and 7.3 summarise the result of the calculation described above. For the purposes of this exercise Age Exclusive units have been grouped together with Sheltered housing.
- 7.11 In summary, there is a current shortfall in supply of all types and tenures of accommodation, including **a current shortfall (and need now) for 186 units of market Extra Care housing, plus an additional future requirement for 236 market Extra Care, making a total (current shortfall and future requirement) requirement for 422 Market Extra Care units of accommodation** (see Table 7.1).
- 7.12 The levels of need are significant and should be considered in light of the prevalence of owner occupation in East Hampshire, where c75% of residents age 65 and over are owner occupiers, as well as the number of older residents with:
- long term illness that limits day to day activity amount numbering 4,816 now, increasing by 2,851 people between 2020 and 2040;
  - mobility issues numbering 5,546 now, projected to increase by 3,161;
  - help required with at least one self-care activity numbering 8,488 now, projected to increase by 4,199;
  - help required with at least one domestic task numbering 8,585 now, projected to increase by 4,368.
- 7.13 We note that if the 'target provision rate' tenure split for Extra Care housing was adjusted to 75% market, 25% affordable (reflecting the East Hampshire tenure profile and in place of 67% market, 33% affordable), then the current shortfall would increase to 239 units market Extra Care, the additional future requirement to 265; a total requirement for 504 units market Extra Care housing.

**Table 7.1: Need for Extra Care Housing in East Hampshire**

	Market	Affordable
Population age 75+ in 2020	14,192	
Target Extra Care Provision Rate (per thousand age 75+)	30	15
<b>Current Extra Care Requirement (units)</b>	<b>426</b>	<b>213</b>
Current Extra Care Supply (units of accommodation)	240	0
<b>Current shortfall (as at mid year 2020)</b>	<b>186</b>	<b>213</b>
Population Change, 75+, 2020 to 2036	7,863	
<b>Additional Future Requirement, 2020 to 2036 (units)</b>	<b>236</b>	<b>118</b>
<b>Current Shortfall and Future Requirement to 2036</b>	<b>422</b>	<b>331</b>

Source: EAC, Q1, 2022; Housing in Later Life 2012. 2020-based SNPP, 2020 population.  
 Figures may not sum due to rounding

**Table 7.2: Need for Enhanced Sheltered Housing in East Hampshire**

	Market	Affordable
Population age 75+ in 2020	14,192	
Target Enhanced Sheltered Provision Rate (per thousand age 75+)	10	10
<b>Current Enhanced Sheltered Requirement (units)</b>	<b>142</b>	<b>142</b>
Current Sheltered Supply (units of accommodation)	52	0
<b>Current shortfall (as at mid year 2020)</b>	<b>90</b>	<b>142</b>
Population Change, 75+, 2020 to 2036	7,863	
<b>Additional Future Requirement, 2020 to 2036 (units)</b>	<b>79</b>	<b>79</b>
<b>Current Shortfall and Future Requirement to 2036</b>	<b>169</b>	<b>221</b>

Source: EAC, Q1, 2022; Housing in Later Life 2012. 2020-based SNPP, 2020 population.  
 Figures may not sum due to rounding

**Table 7.3: Need for Sheltered Housing in East Hampshire**

	Market	Affordable
Population age 75+ in 2020	14,192	
Target Provision Rate (per thousand age 75+)	120	60
<b>Current Sheltered Requirement (units)</b>	<b>1,703</b>	<b>852</b>
Current Sheltered Supply	710	693
<b>Current shortfall (as at md year 2020)</b>	<b>993</b>	<b>159</b>
Population Change, 75+, 2020 to 2036	7,863	
<b>Additional Future Requirement, 2020 to 2036 (units)</b>	<b>944</b>	<b>472</b>
<b>Current Shortfall and Future Requirement to 2036</b>	<b>1,937</b>	<b>630</b>

Source: EAC, Q1, 2022; Housing in Later Life 2012. 2020-based SNPP, 2020 population.  
 Figures may not sum due to rounding

## 8.0 SUMMARY AND CONCLUSIONS

- 8.1 This Report has been prepared by Barton Willmore to inform the current and future need for specialist older people's accommodation in East Hampshire District.
- 8.2 At the outset it is important to emphasise the importance placed on the future supply of older persons specialist housing by the Government and Hampshire Country Council (HCC).
- 8.3 The Government's recent (December 2021) 'Adult Social Care Reform White Paper' acknowledges the low provision of specialist older persons care accommodation in the UK compared with other developed countries. The White Paper therefore outlines the Government's aspirations to provide a range of specialist housing for older people, with a range of care types. The White Paper acknowledges how developers and investors in the private sector are key in achieving the Government's aspiration for a 'thriving' older peoples housing sector.
- 8.4 The Government's aspirations in the White Paper are supported by HCC who identify the clear need that will come in the future across Hampshire. In particular HCC refer to Extra Care as we have summarised in section 3 of this report.
- 8.5 The recent (2021) 'Residential and Nursing Market Position Statement' published by HCC states how the County Council "*intend to almost double capacity for **Extra Care** over the coming years from approximately 800 to 1,500 units*" (Our emphasis). However it is important to note how this statement was based on the provision of affordable extra care facilities and not market provision.
- 8.6 The intention for increasing Extra Care housing is emphasised by HCC's publication of 'Older Adults' Extra Care Housing: Ambitions and opportunities' in which HCC state "*delivery of our ambitious **Extra Care Housing** programme to allow older adults to maintain independence in a home of their own is one of our **top priorities***"<sup>30</sup> (our emphasis).
- 8.7 The Council's Housing and Economic Development Needs Assessment (HEDNA, 2018) recognises the need for older persons specialist accommodation through an assessment of need in Chapter 11 of the document.
- 8.8 However, the HEDNA does not appear to adequately draw upon more recently published provision rates by Housing LIN (namely Housing in Later Life 2012), instead favouring lower

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<sup>30</sup> Page 2, Older Adults' Extra Care Housing: Ambitions and opportunities, HCC, 2020

provision rates in 'More Choice Greater Voice' (2008) and the 2016 Shop@ review. The provision rates of these two sources are applied to 2016-based ONS Sub National Population Projections (SNPP) and population change based on overall housing provision of 608 dpa (the Standard Method minimum housing need calculation).

- 8.9 However, this approach is now considered outdated as in the interim period the 2018-based ONS SNPP have been published. We consider the 2018-based ONS SNPP in this report.
- 8.10 Notwithstanding this the Council's 2018 HEDNA concluded that supply in 2017 **exceeded** demand, whether based on the 2016-based ONS SNPP or the overall housing need figure of 608 dpa, and the provision rates of 'More Choice Greater Voice' or the 2016 Shop@ review.
- 8.11 However, the HEDNA conceded that its evidence is indicative by stating the *"figures provided above should be treated as **indicative** as there is no nationally agreed set of prevalence rates (or how these might be adjusted for local factors)."*<sup>31</sup>
- 8.12 The HEDNA also goes on to state *"The Council should consider reviewing this evidence if a specific application comes in for older persons housing, where this is supported by its own needs assessment."*<sup>32</sup>
- 8.13 The analysis undertaken by Barton Willmore in this report utilises the provision rates published within Housing for Later Life, and utilising up to date Elderly Accommodation Counsel supply data (Quarter 1, 2022). In contrast to the Council's HEDNA this demonstrates that supply **does not** exceed need. Our analysis reveals a current (mid year 2020) shortfall in specialist housing for older people supply of 1,783 units of accommodation, including 186 units of market Extra Care housing.
- 8.14 In addition, over the period from mid year 2020 to 2036 there is a further need to provide for the future growth in the elderly population of East Hampshire, leading to need for a further 1,928 units of all types and tenure, including 236 market Extra Care units.
- 8.15 The combination of the current shortfall and additional future need indicates a total requirement for 3,710 units of specialist older persons accommodation, including 422 market Extra Care units of accommodation by 2036.

<sup>31</sup> Paragraph 11.42, page 181, Interim Housing and Economic Development Needs Assessment (HEDNA), East Hampshire District Council, December 2018

<sup>32</sup> Paragraph 11.42, page 181, Interim Housing and Economic Development Needs Assessment (HEDNA), East Hampshire District Council, December 2018

8.16 The following table provides a summary of the need for older persons accommodation by two key categories – housing without care (including age restricted and sheltered housing), and housing with care (including enhanced sheltered and extra care housing), by tenure.

**Table 8.1: Summary of Total Need (by tenure and type) – East Hampshire District**

Type	Type	Market	Affordable	Total
<b>Without Care</b>	Sheltered housing including age exclusive	1,937	630	<b>2,567</b>
	Enhanced sheltered	169	221	<b>390</b>
<b>With Care</b>	Extra Care	422	331	<b>753</b>
	<b>Total (by Tenure)</b>	<b>2,528</b>	<b>1,182</b>	<b>3,710</b>

Source: EAC Q1 2022, Housing in Later Life 2012

8.17 Table 8.1 reveals that total need (current and future) for market (68%) units exceeds need for rental units (32%), emphasising that the leasehold sector is underprovided for in East Hampshire.

8.18 Within the market 'with care' sector, Extra Care eclipses the demand for enhanced sheltered (providing unregistered care) with 753 units of Extra Care needed, 17% of total market specialist housing need.

8.19 In conclusion there is a clear immediate requirement for specialist older people's accommodation within East Hampshire and given the local demography and focus by Central Government, greater emphasis should be placed on its delivery.

## **APPENDIX 1**

### **EXPLANATION OF TERMS USED IN THIS REPORT**

## **Appendix One      Explanation of terms used in this report**

This report uses terms which are commonly understood among those working in the field of housing and care for older people but may not be so readily comprehensible by those working in other disciplines. Whilst not exhaustive this section seeks to explain the meaning and usage on this document, of some of those terms:

**Age Exclusive Housing** is generally designed to extend the capacity of older people to maintain their independence and mitigate risk through accessible design. Generally these are easily managed units of moderate size allowing older people to down-size to a more economic and readily managed setting. They generally lack the communal facilities and on-site support services associated with Sheltered or Retirement Housing. In the social rented sector they will often comprise what was formerly known as Category One Sheltered Housing or "Older Persons' Dwellings". They are increasingly seen as an important element in the Market Sector to encourage the process of "right-sizing".

**Sheltered housing** is a form of housing intended for older people that first emerged in the 1950s and was developed in volume through the 1960s and 1970s. In this period it was developed in one of two styles: "Category Two" Sheltered Housing consisted of flats and/or bungalows with enclosed access, a communal lounge and some other limited communal facilities such as a shared laundry and a guest room. Support was provided by one or more "wardens" who were normally resident on site. "Category One" Sheltered Housing has many of the same features but might not have enclosed access, might have more limited communal facilities and would not normally have a resident warden. In current practice these models have merged and the service models for delivery of support are in flux. This provision has generally been made by Housing Associations and Local Authorities.

**Retirement Housing** is a term widely adopted to describe Sheltered Housing, similar in built form and service pattern to Category Two Sheltered Housing described above but offered for sale, generally on a long lease, typically ninety-nine or one hundred and twenty-five years. This provision has generally been made both by Housing Associations (often through specialist subsidiaries) and commercial organisations.

**Very sheltered housing** is a term now largely disappearing from use that was used first in the mid to late 1980s to describe sheltered schemes that sought to offer some access to care services and some additional social and care facilities.

**Enhanced sheltered housing** is the term that has largely succeeded to Very Sheltered Housing to describe sheltered housing that provides more in facilities and services than traditional sheltered housing but does not offer the full range of facilities, services and activities to be found in an Extra Care Housing Scheme.

**Extra Care Housing** is the term used for a complex of specialised housing for older people that provides a range of "lifestyle" facilities for social, cultural, educational and recreational activities, in addition to services that provide care in a style that can respond flexibly to increasing need whilst helping the individual to retain their place within their existing community. In most Extra Care Housing schemes people enter their unit of accommodation and the care services they receive are delivered into that unit as their needs increase. This is generally referred to as the "integrated model" of Extra Care.

**Continuing Care Retirement Community** is a variant of the Extra Care Housing model but one in which higher levels of care are generally delivered by transfer within the scheme from an independent living unit in which low to moderate care is delivered into a specialist unit or care home. This pattern is often referred to as the "campus" model of Extra Care.

**Registered Care Home** is the form of institutional provision that in the past would have been referred to as either a "Residential Care Home" or a "Nursing Home". All are now referred to as "Registered Care Homes" and differentiated as either "Registered Care Home providing personal care" or as a "Registered Care Home providing nursing care".

## **APPENDIX 2**

### **SPECIALIST ACCOMMODATION FOR OLDER PEOPLE IN EAST HAMPSHIRE**

## Appendix Two: Specialist Accommodation for Older People in East Hampshire

Originally sourced from the Elderly Accommodation Counsel Database on 21st January 2022.

### Affordable age exclusive housing

Name of scheme	Address	Manager	Number of units
Heatherlands Estate	Headley Down, Bordon, Hampshire, GU35 8AU	Radian	19
Nursery Road	Alton, Hampshire, GU34 2DN	Radian	13
<b>Total</b>			<b>32</b>

### Market Age Exclusive housing

Name of scheme	Address	Manager	Number of units
Pine Court	Lymington Bottom, Four Marks, Alton, Hampshire, GU34 5AH	Belford House	10
Merritts Meadow	Station Road, Petersfield, Hampshire, GU31 4AH	ELM Group	15
Maygate Place	Lymington Bottom Road, Medstead, Alton, Hampshire, GU34 5EW	ELM Group	17
Convent Court	47 Havant Road, Emsworth, Hampshire, PO10 7JF	Self Managing Group	17
<b>Total</b>			<b>59</b>

### Affordable Sheltered housing

Name of scheme (affordable sheltered)	Address	Manager	Number of units
Town Close bungalows	Town Close, Ropley, Alresford, Hampshire, SO24 0DG	Radian	9
Westburn Fields bungalows	Westburn Fields, Lower Froyle, Alton, Hampshire, GU34 4LF	Radian	9
Orchard House	Orchard Lane, Alton, Hampshire, GU34 1DZ	Radian	88
Edward Road	Alton, Hampshire, GU34 2EX	Radian	8
Readon Close bungalows	Readon Close, Petersfield, Hampshire, GU31 4AN	Radian	8
Boyneswood Road	Medstead, Alton, Hampshire, GU34 5ED	Radian	6
Fletchers House	Fletchers Field, Liphook, Hampshire, GU30 7ET	Radian	51

<b>Name of scheme (affordable sheltered)</b>	<b>Address</b>	<b>Manager</b>	<b>Number of units</b>
Homefield Cottages	Station Road, East Tisted, Alton, Hampshire, GU34 3QU	Radian	5
Shaftesbury Court	50 Forest Road, Bordon, Hampshire, GU35 0XE	Sanctuary Housing	40
Parsonage Close	Brightstone Lane, Farringdon, Alton, Hampshire, GU34 3EU	Radian	4
Alpha Cottages	Nursery Road, Alton, Hampshire, GU34 2DP	Radian	4
Windmill Fields bungalows	Windmill Fields, Four Marks, Alton, Hampshire, GU34 5HJ	Radian	4
Siward House	Borough Road, Petersfield, Hampshire, GU32 3LR	Radian	36
Ramscote	Ramshill, Petersfield, Hampshire, GU31 4YZ	Radian	34
Hanover Court	11 Tower Road, Liphook, Hampshire, GU30 7AX	Anchor	34
Gloucester Court / Winton and Barham Rds	Lyndum Close, Petersfield, Hampshire, GU32 3HF	Radian	32
Oak Lodge	Hendon Road, Bordon, Hampshire, GU35 0TX	Radian	30
Inwood Court	High Street, Alton, Hampshire, GU34 1AH	Sanctuary Housing	29
Gilmour Gardens	Anstey Lane, Alton, Hampshire, GU34 2NR	Radian	26
Fielders Court	Amery Street, Alton, Hampshire, GU34 1JE	Anchor	25
Lindford Wey bungalows	Lindford Wey, Lindford, Bordon, Hampshire, GU35 0SZ	Radian	24
Burgesmede House	2 Folly Lane, Petersfield, Hampshire, GU31 4BH	Sovereign Housing Association	24
Farthing Fields	Headley, Bordon, Hampshire, GU35 8PD	Radian	24
Chestnut Court	Hendon Road, Bordon, Hampshire, GU35 0TX	Radian	22
Victoria Road East	Alton, Hampshire, GU34 2DL	Radian	17
Rother House	Hill Brow Road, Liss, Hampshire, GU33 7LG	Radian	15
Champney Close	Whitehill, Bordon, Hampshire, GU35 9DX	Radian	15
The Garth	Nursery Road, Orchard Lane, Alton, Hampshire, GU34 2HY	Radian	14
The Carlings	Alton, Hampshire, GU34 1LY	Radian	13

<b>Name of scheme (affordable sheltered)</b>	<b>Address</b>	<b>Manager</b>	<b>Number of units</b>
Eastbrooke Road	Alton, Hampshire, GU34 2DR	Radian	11
<b>Total</b>			<b>661</b>

### Market Sheltered housing

<b>Name of scheme (market sheltered)</b>	<b>Address</b>	<b>Manager</b>	<b>Number of units</b>
Willow Court	Ackender Road, Alton, Hampshire, GU34 1JW	FirstPort	72
Adams Way	Anstey Road, Alton, Hampshire, GU34 2UY	Anchor	47
Rosecott	Havant Road, Horndean, Hampshire, PO8 0XA	Gateway Property Management Limited	43
Queen Elizabeth Place	Orchard Lane, Alton, Hampshire, GU34 1DQ	McCarthy Stone Management Services	43
Lavant Court	Charles Street, Petersfield, Hampshire, GU32 3EQ	FirstPort	42
Ladyplace Court	Market Square, Alton, Hampshire, GU34 1HD	Grange Property Management	36
St Peters Court	Hylton Road, Petersfield, Hants, GU32 3JH	Freemont Property Managers	34
The Cooperage	Lenton Street, Alton, Hampshire, GU34 1HB	Grange Property Management	33
Windmill Court	St Mary's Close, off Turk Street, Alton, Hampshire, GU34 1EQ	Anchor	32
Heath Lodge & Court	Sussex Road, Petersfield, Hampshire, GU31 4LF	FirstPort	31
Cremorne Place	King George Avenue, Petersfield, Hants, GU32 3EP	Hadrian Properties Management Co	30
Clover Leaf Court	Ackender Road, Alton, Hampshire, GU34 1NQ	McCarthy Stone Management Services	29
Cornerway Lodge	Headley Road, Hindhead, Surrey, GU26 6TN	Millstream Management Services	29

<b>Name of scheme (market sheltered)</b>	<b>Address</b>	<b>Manager</b>	<b>Number of units</b>
Berehurst	Borovere Lane, Alton, Hampshire, GU34 1PA	Cognatum Estates	26
Radford Court	Tower Road, Liphook, Hampshire, GU30 7GR	McCarthy Stone Management Services	25
Candleford Gate	Tower Close, Liphook, Hampshire, GU30 7DP	Anchor	25
Gaskell Court	Thornton End, Holybourne, Alton, Hampshire, GU34 4HF	Anchor	22
Cromwell Gardens	Tanhouse Lane, Steeple Drive, Alton, Hampshire, GU34 1TR	Broadleaf Management Services Ltd	22
Summerhouse Court	Headley Road, Grayshott, Hindhead, Surrey, GU26 6UJ	Anchor	20
The Firefly Club	Lynton Road, Bordon, Hampshire, GU35 0RL	Omega (After Alpha) Ltd	10
<b>Total</b>			<b>651</b>

#### **Market Enhanced Sheltered housing**

<b>Name of scheme</b>	<b>Address</b>	<b>Manager</b>	<b>Number of units</b>
Blenheim Court Apartments	Farnham Road, Liss, Hampshire, GU33 6JA	Maria Mallaband Care Group Ltd	6
Mary Rose Mews	Adams Way, Alton, Hampshire, GU34 2UU	The Brendoncare Foundation	46
<b>Total</b>			<b>52</b>

#### **Market Extra Care**

<b>Name of scheme</b>	<b>Address</b>	<b>Manager</b>	<b>Number of units</b>
Bramshott Place	Hewshott Lane, Liphook, Hampshire, GU30 7GZ	Inspired Villages Group	184
Austen Place	Lower Turk Street, Alton, Hampshire, GU34 1FZ	YourLife Management Services	56
<b>Total</b>			<b>240</b>

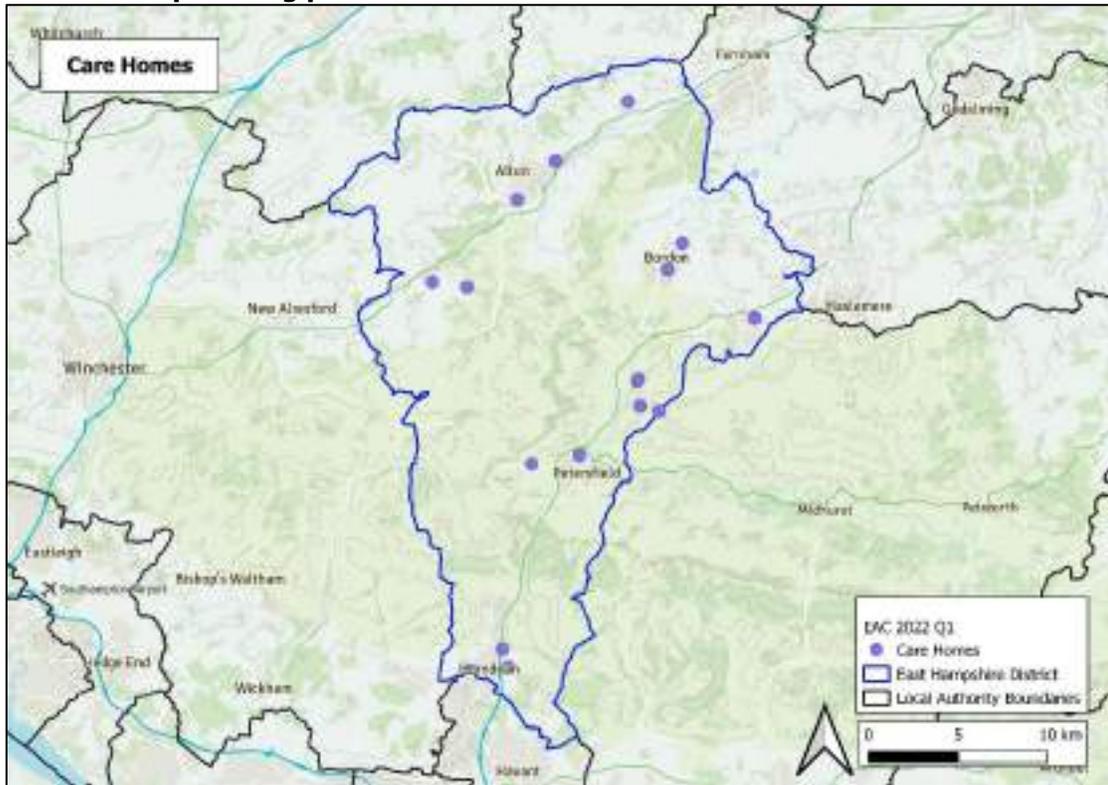
## Registered care homes providing personal care

Name of scheme	Address	Owner	Number of beds
Whitehaven Care Home	22 Whitehaven, Waterlooville, Horndean, Hampshire PO8 0DN	██████████ ██████████	15
Milkwood House	Hillbrow, Liss, West Sussex GU33 7PB	Milkwood Care Ltd	43
Ashley House Residential Care Home	56 Forest Road, Borden, Hampshire GU35 0XT	Sanctuary Care	36
Forest Brow Care Home	63 Forest Road, Liss, Hampshire GU33 7BL	Quality Care Group	32
The Firefly Club	Lynton Road, Bordon, Hampshire GU35 0RL	Omega (After Alpha) Ltd	8
Rotherbank	11-13 Rotherbank Farm Lane, Liss, Hampshire GU33 7BJ	██████████	21
Downs House	Reservoir Lane, Petersfield, Hampshire GU32 2HX	Western Health Care Limited	37
Wisteria Lodge Residential Home	82 London Road, Horndean, Waterlooville, Hampshire PO8 0BU	Wisteria Lodge Ltd	19
Westlands Retirement Home	Headmore Lane, Four Marks, Alton, Hampshire GU34 3EP	Westlands Care Home Limited	51
Stroud House	Rothercombe Lane, Stroud, Petersfield, Hampshire GU32 3PQ	Western Healthcare Ltd	25
Belford House	Lymington Bottom, Four Marks, Alton, Hampshire GU34 5AH	Belford House	30
East Hill House & Cottages	East Hill Drive, Hillbrow Road, Liss, Hampshire GU33 7RR	Caring Homes Group	45
Bramshott Grange	Connaught Drive, Liphook, Hampshire GU30 7GZ	Dormy Care Communities	67
Pax Hill Elderly Mentally Frail Unit	Pax Hill Care Home, Bentley, Farnham, Surrey GU10 5NG	Danaz Health Care Ltd	26
Borovere	10 Borovere Lane, Alton, Hampshire GU34 1PD	Greensleeves Care	30
The Lawn	119 London Road, Holybourne, Alton, Hampshire GU34 4ER	Friends of the Elderly	31
<b>Total</b>			<b>516</b>

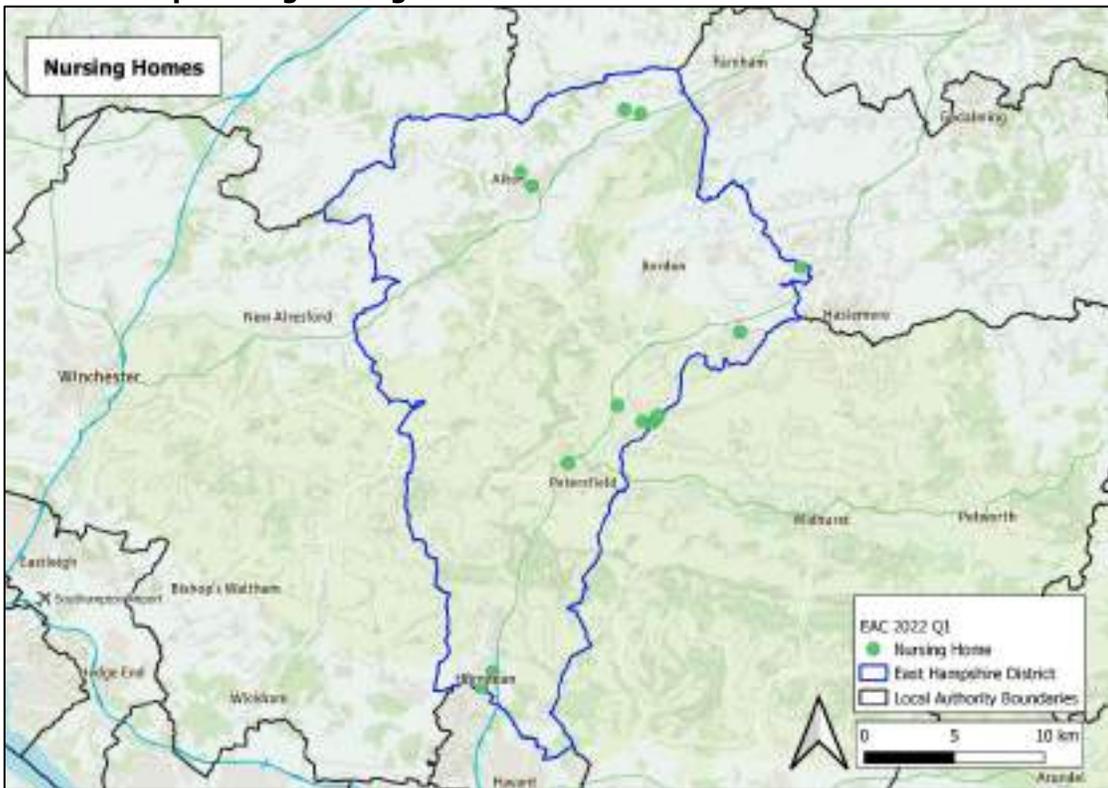
## Registered care homes providing nursing care

Name of scheme	Address	Owner	Number of beds
Chatterwood Nursing Home	Huntsbottom Lane, Hill Brow, Liss, Hampshire GU33 7PA		24
Acacia House Nursing Home	33 Portsmouth Road, Horndean, Hampshire PO8 9LN	Milkwood Care Ltd	27
Greenbanks Care Home	29 London Road, Liphook, Hampshire GU30 7AP	Contemplation Homes	30
Green Gables Nursing Home	Church Lane, Grayshott, Hampshire GU26 6LY	Buckland Rest Homes Limited	38
Fieldgate Nursing Home	153 Portsmouth Road, Horndean, Hampshire PO8 9LG		39
Eastfield Nursing Home	Hill Brow Road, Liss, Hampshire GU33 7PS	Extraservices Ltd - [REDACTED]	43
Wenham Holt Nursing Home	London Road, Hill Brow, Liss, Hants GU33 7PD	Eastfield Care Homes Ltd	50
Wenham Holt Nursing Home	Hillbrow, Liss, Hampshire GU33 7PD	Wenham Holt Nursing Home Ltd	50
Bentley Lodge Care Home	Bentley, Farnham, Hampshire GU10 5LW	Wenham Holt Nursing Home Ltd	56
Blenheim Court Care Home	Farnham Road, Liss, Hampshire GU33 6JA	Bentley Lodge Care Home Ltd	60
Pax Hill Care Home	Pax Hill, Bentley, Farnham, Surrey GU10 5NG	Caring Homes Group	61
Steep House Nursing Home	Tilmore Road, Steep, near Petersfield, Hampshire GU32 2HS	Danaz Health Care Ltd	62
Pear Tree Court	25-31 Portsmouth Road, Horndean, Waterlooville, Hampshire PO8 9LN	London Residential Healthcare Limited	72
Marfield House	Gilbert White Way, Wooteys, Alton, Hampshire GU34 2LF	Care UK	74
Brendoncare Alton	Adams Way, Alton, Hampshire GU34 2UU	Hampshire County Council	80
<b>Total</b>			<b>766</b>

**Figure 1: Care Homes providing personal care**



**Figure 2: Care Homes providing nursing care**



# Representation by Inspired Villages

To support the practical delivery of much-needed specialist accommodation to meet the needs of an ageing population (version 2)

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## Foreword

We are not just getting older, we are living longer with rising health and care needs and by 2035, one in four of the population will be over 65 years old. With the unprecedented increase in the number of older people, a new approach is required to respond to the challenges of loneliness, isolation, unsuitable housing, unresponsive and rigid services.

We need to create environments where the chances of living well for longer, independently and actively are maximised, recognising the importance of social engagement and meaningful relationships to mitigate pressures on the health and social care system.

The planning system has struggled to keep up with the emerging models in the later living sector in recent years. This report is intended to assist local planning authorities with their development plan preparation to produce positive policies that will enable the housing needs for older people to be met, in full, particularly as such needs have been identified by the government's national planning guidance to be critical.

Legal & General entered the later living sector in the UK in August 2017, marking the first major institutional investment into this critically under supplied segment of the residential market. Legal & General are investing for the long-term with ambitious plans to deliver £4 billion of capital into the sector over the next five years, providing over 8,000 units of much-needed accommodation for older people and it is vital that the planning system can respond to the challenge.



Inspired Villages and CEO of Legal & General Later Living

## Contents

Summary of recommendations	5
Introduction	6
Definitions of older people’s housing and care	7
Deliverability and use class	11
Definitions of care	13
Evidence base and approach for local plan-making	13
Local planning authority plan-making	18
Examples of other local authorities taking a similar policy approach	22

## Inspired Villages recommendations

Inspired Villages makes the following eight recommendations which should be incorporated into the emerging local plan to support the practical delivery of specialist housing for older people and meet the ever-growing need. The local plan and its evidence base should:

1. Be **based on a clear understanding of specialist housing for older people** drawing upon national guidance and other sources, particularly regarding the use class and recognise the different types of specialist housing which exist.
2. Be **based on a robust evidence base that identifies the housing requirements of specialist housing for older people** drawing upon appropriate sources recognised within the sector.
3. **Set out clear and specific policy / policies to address housing needs for older people** (e.g. care villages and extra care), on land in, or adjacent to settlement boundaries where those settlements that provide a certain level of services and facilities, where the proposed development provides sustainable transport measures and communal facilities and where there is an identified need.
4. **Set indicative figures or a range for the number of specialist housing for older people needed across the plan area throughout the plan period** and this must recognise the diverse models that exist.
5. **Monitor the delivery of housing for older people and deliver action plans to address under provision.**
6. Consider the **inclusion of specialist housing for older people within appropriate strategic or other site allocations** subject to consideration of need, site and locational factors and deliverability.
7. Must **recognise the significant benefits associated with specialist housing for older people** and this can inform planning decision making.
8. Set out different policy requirements, for example, affordable housing, for a retirement community (C2 use) compared to residential development (C3 use) and the evidence base and viability should take into account the different circumstances between the uses (e.g. retirement communities provide significant levels of communal facilities / non saleable floorspace and their ongoing maintenance and management, staffing, funding, etc). Where there is doubt, policies should provide sufficient flexibility for specific circumstances, which may include viability, to be assessed through a planning application.

## Introduction

- 1.1 There is a significant existing shortage of suitable accommodation to meet the needs of the ageing population in the UK and the planning system must take positive measures to address this. The National Planning Policy Guidance (NPPG) identified that in mid-2016 there were 1.6m over-85s and this will double to 3.2m by 2041.<sup>1</sup> The majority of the ageing population are able to, and want to, live independently for as long as possible, and will not require intensive care home accommodation until much later in life, if at all. However, in this period older people will reconsider whether their home is most suitable for their current needs and are more likely to require increasing assistance with day-to-day tasks and managing their health. Accordingly, there is a need for a variety of types of specialist accommodation for older people, to meet the varying needs of individuals.
- 1.2 The coronavirus pandemic has brought into focus that the current system of older people remaining in unsuitable housing to meet their needs or care homes is not appropriate. A retirement community model addresses the deficiencies of the existing options, and this is an opportunity to provide appropriate homes for older people to allow them to age in place with access to care and facilities on-site to meet their day-to-day needs.
- 1.3 What is not clear is how these different types of development should be classified, **and delivered**, by the planning system. **There is no consistent approach to local plan policies looking to tackle this issue.** Some local plans might support the principle of the delivery of specialist accommodation for older people, but do not necessarily deal with delivery in a practical sense. An Irwin Mitchell report 'Unlocking potential for senior living' (July 2020) identified that

**50% of Councils do not have any specific planning policies nor site allocations to make provision for housing for older persons.** For example, South Gloucestershire Council's Core Strategy (adopted December 2013) Policy CS20 supports the provision of extra care accommodation which "*should be located so they are accessible to local facilities, proportionate in scale to the locality and provide ancillary facilities as part of the development.*" However, for retirement community operators searching for suitable accessible sites there will normally be competition with residential developers for allocated sites or, if not allocated, then usually this would be outside the settlement boundary and thereby there may be some degree of conflict with other development plan policies.

- 1.4 There has been an **inconsistent approach to plan-making and decision taking at a local level** across the country, which inevitably causes uncertainty for developers and operators within the sector, which results in delay to delivery and reduces investor confidence. The lack of specific local plan policies and misinterpretation of the Use Classes Order are particular issues.
- 1.5 Inspired Villages representation provides a developer / operator's perspective, to provide industry insight at an early stage in your plan-making process, which can be used to develop planning policies that are better placed to support delivery and in compliance with the objectives of the National Planning Policy Framework (NPPF) and the NPPG. Details of who Inspired Villages are and our model are set out in the accompanying **21st Century Care document**. This representation makes **8 recommendations** for the local planning authority to consider and to incorporate within your emerging local plan to ensure the delivery of much-needed older people's housing.

**“There has been an inconsistent approach to plan-making and decision taking at a local level across the country.”**

<sup>1</sup> NPPG Paragraph: 001 Reference ID: 63-001-20190626

## Definitions of older people's housing and care

- 2.1 Since the late 1970s, accommodation for older people was generally limited to three options: remaining in the family home; moving into sheltered housing; or moving into a care home.<sup>2</sup> A large volume of sheltered housing was developed in the 1980s to 2000s, predominantly by McCarthy & Stone and registered providers of social housing. This stock forms the bulk of existing provision in the UK. In recent years there has been a considerable reduction in the availability of funding with spending falling in real terms,<sup>3</sup> and local authorities seek alternative, more cost-effective means of providing care and accommodation for those who would otherwise be funded to move into residential care.
- 2.2 Furthermore, those who would otherwise fund their own care in a care home now seek alternative options to retain their independence for as long as possible. The opportunity to retain a level of equity from an existing home by moving at an earlier stage to specifically designed housing for older people from properties that are often larger and difficult to maintain, and where increasing levels of care can be bought in as required, can serve to delay or prevent a move into a care home.<sup>4</sup>
- 2.3 The government's '**Housing for Older and Disabled Guidance (2019)**<sup>5</sup> set out four types of specialist housing to meet the diverse needs of older people and we also provide additional points from the Associated Retirement Community Operators (ARCO),<sup>6</sup> who are the main body representing the retirement community sector in the UK, (in italics, below), with regards the size of schemes:

**1 Age-restricted general market housing:** Usually for people aged 55 and over. May include some shared amenities such as communal gardens but does not include support or care services.

**2 Retirement living or sheltered housing:** Usually consists of purpose-built flats or bungalows with limited communal facilities such as a lounge, laundry room and guest room. Does not generally provide care services but provides some support to enable

residents to live independently (may include 24-hour on-site assistance and a warden or house manager). The housing provided is available on a variety of tenures: shared ownership, long leasehold and rent (social and private). *Typically, 40-60 units.*

**3 Extra care housing or housing-with-care (assisted living or independent living):** Usually consists of purpose-built or adapted flats or bungalows with a medium to high level of care available, if required, through a registered on-site care agency. Residents can live independently with 24-hour access to support services and staff, and meals are also available. Often there are extensive communal areas, spaces to socialise or a well-being centre. In some cases, **these developments are known as retirement villages or retirement communities** – with the intention for residents to benefit from varying levels of care as time progresses. *Typically, 60-250 units. An Inspired Villages retirement community falls within extra-care housing.*

**4 Residential care homes and nursing homes:** Provide individual rooms (usually with en-suite) within a residential building, together with a high level of care (24-hour), meeting all activities of daily living. Also includes dementia care homes. Range of facilities and activities including gardens, lounges and dining rooms. *Sizes of homes vary considerably. Registered and regulated by the Care Quality Commission (CQC) in England, (by the Regulation and Quality Improvement Authority (RQIA) in Northern Ireland and the Care Inspectorate in Scotland and the Care Inspectorate in Wales (CIW)).*

2.4 Until recently, extra care or 'housing-with-care' was not widely recognised as providing an alternative to residential care. However, such accommodation maintains an individual's independence within their own specifically designed property with

<sup>2</sup> Jones, R (2007) A Journey through the Years: Ageing and Social Care. (Ageing Horizons) Issue No. 6, 42-51. Oxford Institute of Ageing

<sup>3</sup> Bottery S, Ward D and Fenney D (2019) Social Care 360. The King's Fund

<sup>4</sup> The University of Sheffield and Dwell (2015). Extra-care Housing: Brief development

<sup>5</sup> Gov.UK (2019) Housing for Older and Disabled People

<sup>6</sup> Associated Retirement Community Operators (ARCO) website: www.arcouk.org

a range of services and, importantly, where increasing levels of care can be bought in as needs change. Having evolved in recent years to respond to the growing demand from older people for greater choice, quality and independence, the number of models and designs have made it difficult to define this form of accommodation, however, the Care Services Improvement Partnership (2011)<sup>7</sup> identified three common features:

- 1 A type of residential accommodation, a person's own home. It is not a care home or a hospital and this is reflected in its occupancy through ownership, whether it be lease or tenancy;
- 2 It is accommodation that has been specifically designed, built or adapted to facilitate the care and support requirements of its owners or tenants; and
- 3 Access to care and support is available 24 hours per day.

**Recommendation One:**  
Local plans **must be based on a clear understanding of specialist housing for older people** and the Use Classes Order drawing upon the PPG and other relevant guidance.

- 2.5 Frequently local planning authorities overlook the extra care model, particularly the scale of a retirement community and instead focus on sheltered housing or care homes. It is essential that authorities recognise the different models.
- 2.6 Private extra care development in the UK broadly reflects the economic boom of the middle part of the 2000s. Between 2005 and 2009 there was an acceleration of development, particularly care villages. However, following the downturn in the residential housing market, the number of new, private extra care and care village developments reduced significantly from 2009. Such developments have increased again from the mid-2010s resulting from the ever-increasing ageing population.

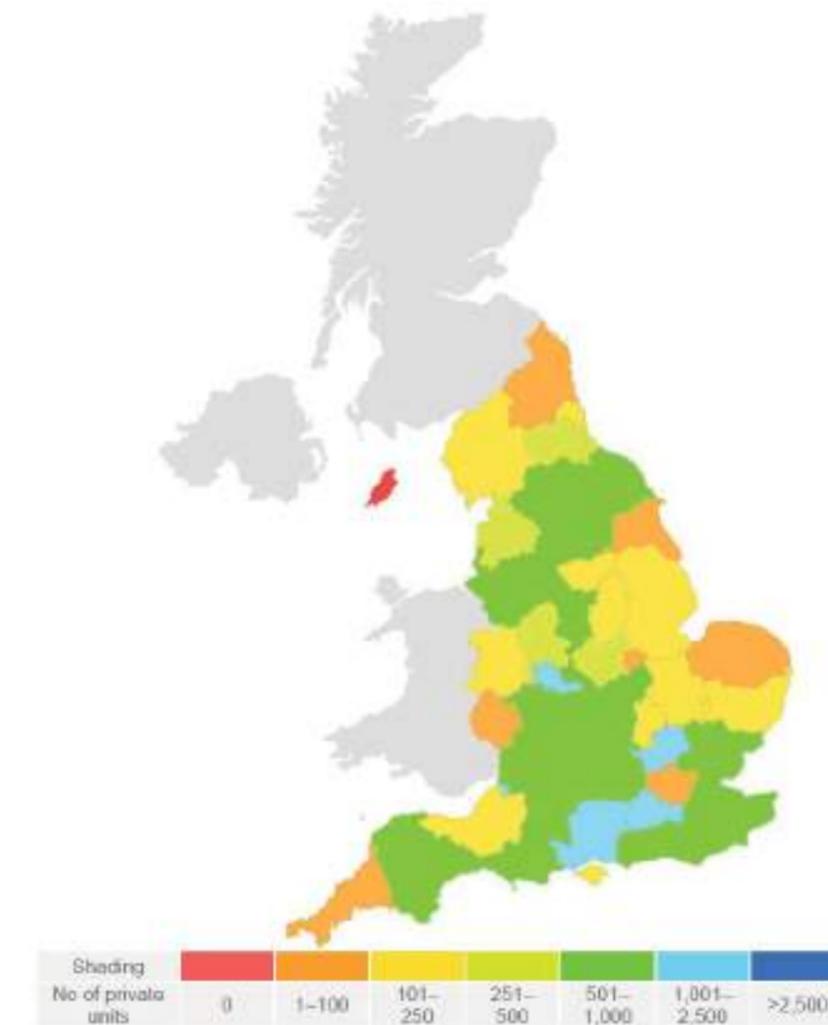
- 2.7 The average size of older people's housing developments has increased year on year, driven by larger village style developments and a requirement for economies of scale when providing on-site care and facilities.
- 2.8 It is important that a range of tenure types are provided for, to meet the housing need for older people. For the private sector, the decision to acquire or rent an extra care unit is choice driven, whereas in the affordable sector it is more likely to be based on need. For those choosing to acquire or rent a private extra care unit they should be able to choose the type of accommodation that best suits their circumstances and

consequently planning policy needs to support the delivery of housing types that meet the relevant local demand. For example, **in areas where there is high prevalence of home ownership, the policy should encourage higher rates of private extra care delivery to match tenure.**

2.9 Figure 1 below shows the geographic distribution by county in England of private older people's housing units where on-site care and facilities are provided. Overall it shows an historic low level of provision across England resulting in under supply and increasing needs.

**Private older people's housing per county with on-site care and facilities**

Figure 1



Source: Carterwood, EAC database May 2019.

Table 1

Older people's housing by age of construction					
Decade	Schemes	Total units	Private units	% of private units	Average scheme size
Unknown	487	11,701	9,384	5.4	24
Prior to 1970	130	2,895	2,171	1.3	22
1970s	50	1,405	948	0.6	28
1980s	1,886	66,086	59,987	34.8	35
1990s	864	30,018	26,418	15.3	35
2000s	932	40,054	34,963	20.3	43
2010s	1,079	52,632	37,107	21.6	49
Forthcoming	46	2,184	1,141	0.7	47
<b>Total</b>	<b>5,474</b>	<b>206,975</b>	<b>172,119</b>	<b>100.0</b>	<b>37.8</b>

Source: Carterwood, EAC database May 2019. (Note. EAC database includes all schemes, including private rental and 'other' tenure types, the latter making up a small proportion of total units. 'Unknown' schemes are likely to be older developments where no date of construction has been provided.)

<sup>7</sup> The Extra Care Housing Toolkit [https://www.housinglin.org.uk/\\_assets/Resources/Housing/Support\\_materials/Toolkit/ECH\\_Toolkit\\_Website\\_Version\\_Final.pdf](https://www.housinglin.org.uk/_assets/Resources/Housing/Support_materials/Toolkit/ECH_Toolkit_Website_Version_Final.pdf)

2.10 There are a variety of site size requirements dependent upon the operator, the proposed scheme and its location. They tend to range between 0.5 to 1.5 acres for more traditional sheltered housing schemes and care home schemes where a lower level of amenities is provided on site, up to approximately 10 acres for the more extensive, all-encompassing retirement community / extra care schemes.

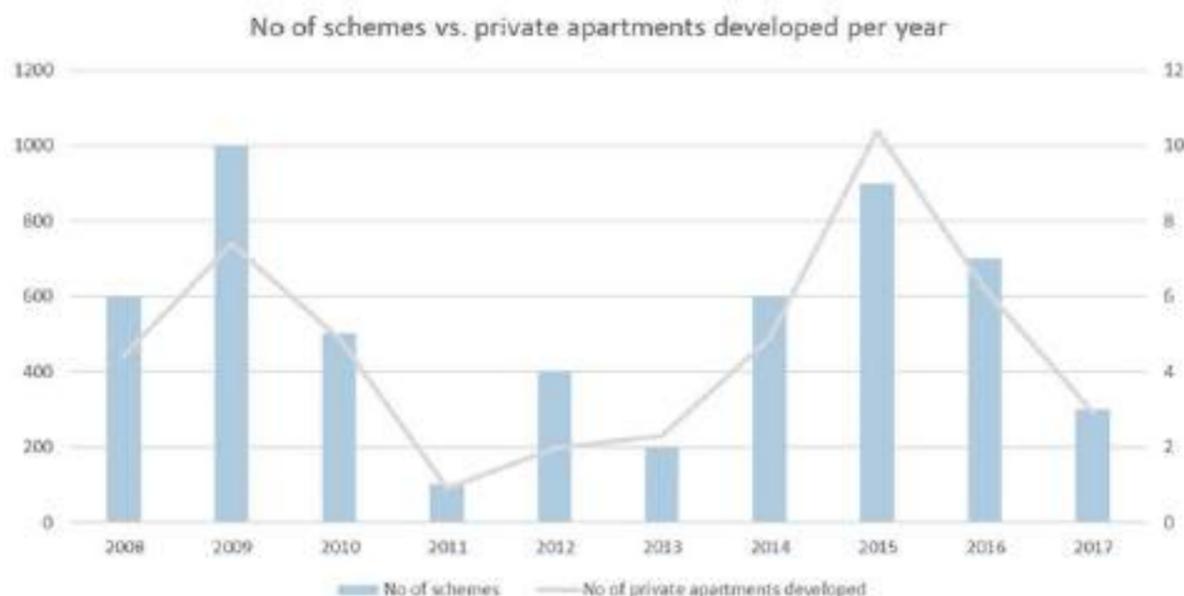
2.11 Despite strong sales rates and a demand that is tending to outstrip supply, the UK has only 4,535 private older people's housing schemes, including 124 care villages (based on the EAC definition of care village).<sup>8</sup> Note: Care village is the same as a retirement community.

2.12 There have been fluctuations in new development during the ten years to 2017, as shown in table 2 below which compares the number of schemes developed against the number of private apartments. These developments are operated by, among others: Audley Retirement, Inspired Villages, Retirement Villages, Richmond Villages, Lifecare Residences, Fortis Living, The Extracare Charitable Trust, The Joseph Rowntree Housing Trust, MHA and St Monica Trust.

#### Recommendation Two:

The local plan **must be based on a robust evidence base that identifies the housing requirements of specialist housing for older people** drawing upon appropriate sources recognised within the sector.

Table 2



Source: Carterwood.

## Deliverability and use class

2.13 Planning policies typically require there to be an identified need and for development to be proportionate to its surroundings. However, in terms of deliverability for a retirement community, for the communal facilities, funding and infrastructure needed to work as housing-with-care, which can sufficiently facilitate 'wellness' long-term, there is a **minimum scale that works financially and operationally.**

2.14 Inspired Villages typical model is for approximately 150 units of accommodation with some 210,000 sq.ft of floorspace, of which, approximately 40,000 sq.ft would be communal facilities (café / bar, restaurant, wellness centre including treatment rooms, fitness studio and pool, library, craft room and hairdressers – referred to as non-saleable space). Therefore, a development requires a certain minimum scale of development to be viable, whilst meeting the identified need. This means it is not realistic to disaggregate a retirement community into smaller amounts as it would not be viable to deliver.

#### Recommendation Three:

The local plan should **set out clear and specific policy / policies to address housing needs for older people (e.g. retirement communities / extra care):**

1. On land in, or adjacent to settlement boundaries where those settlements provide a certain level of services and facilities.
2. Where the proposed development provides sustainable transport measures and communal facilities.
3. Where there is an identified need.

2.15 Planning policies must be sufficiently flexible to take account of current identified need for older people's housing, assessed on a case-by-case basis, via each planning application. **The introduction of an exceptions-based policy will assist delivery of new retirement communities to meet the critical need.**

#### Use class

2.16 The key considerations in determining the use class for specialist older people's

housing is the level of care and scale of communal facilities provided.<sup>9</sup> Indeed these are they key reasons why an elderly person chooses to move. A retirement community is not accommodation alone, they provide both 24-hour care and communal facilities, that enables individuals to live independently in their own home, with the security and amenities that allow for peace of mind. Such developments are C2 rather than C3 use, even when there is no registered care home as part of the development. This has been identified in recent planning appeals such as West Malling in 2018, amongst others.<sup>10 11 12</sup> **LPAs seeking to wrap older persons housing into a general C3 use or applying affordable housing policy acts as a barrier to delivery.**

2.17 In July 2018, ARCO agreed without an evidence-based approach, the NPPF was right in recognising the need for a sufficient supply of housing for older people. ARCO stated that *'More work needs to be done, including clear guidance for councils to make provision for the different needs of older people. Without this there is a risk of the NPPF becoming a blunt instrument which fails to make a difference to planning decisions'* and supported a *'more explicit statement that C2 use classes include genuine housing with care developments.'* Inspired Villages are an ARCO Approved Operator and adhere to their Consumer Code which provides a benchmark for good practice in the sector.

2.18 The reason for the lack of clarity is because the Use Classes Order pre-dates the introduction of the variety of options for accommodation (with or without care) that now exist. The Use Classes Order is in need of updating in this respect.

2.19 The 2019 report 'Shining a spotlight on the hidden housing market'<sup>13</sup> considered that a new use class should be created specifically for retirement living schemes as they have previously fallen under C2, C3 or sui generis, which has led to inconsistencies in terms of delivery, location and affordable housing provision between local authorities. The term 'specialist housing for older people' (see paragraph 2.3) covers a range of types of development. Some of those

8 Hartley, B (2018) Care Village Editorial. Healthinvestor

9 NPPG Paragraph: 014 Reference ID: 63-014-20190626

10 Appeal Decision: Ref: APP/Q3630/W/18/3195463. Oak Tree Nurseries, Stroude Road, Virginia Water, GU25 4DB. 15 February 2019

11 Appeal Decision: Ref: APP/A0665/W/18/3203413 Beechmoor Garden Centre, Whitchurch Road, Great Boughton, Chester CH3 5QD. 17 July 2019

12 Appeal Decision: Appeal Ref: APP/H2265/W/18/3202040 Land to the rear of 237-259 London Road, West Malling, Kent ME19 5AD. 19 December 2018

13 Shakespeare Martineau and Housing LIN (2019) Shining a Spotlight on the Hidden Housing Market.

types of development do not involve the delivery of care, nor the inclusion of facilities that support the delivery of care and on-going “wellness” and it is generally agreed that those developments fall within use class C3, whereas a retirement community falls fully within C2.

**2.20** It is essential that the evidence base / viability assessment properly understands the retirement community model and these extra significant costs. **It is not appropriate for a C2 development to attract the same affordable housing requirement as C3 residential which does not have such costs to development.**

**2.21** Specialist housing for older people differs in a number of ways that affect its viability, which all feed into the consideration of whether or not it can fund additional obligations such as affordable housing, including:

- Funding;
- The long-term operation, management and ownership of the site;
- The provision, maintenance, upkeep and management of the significant communal facilities, including its delivery before the first unit is occupied; and
- Staffing

**2.22** These factors are intrinsic in recognising that a retirement community or extra care model is very different from Class C3 residential development that directly affects deliverability, and in turn the **inappropriateness of applying policy intended to be applied to C3 residential development.**

**2.23** The following principles are drawn from recent appeal decisions, for example, Retirement Villages appeal at Shiplake in South Oxfordshire District Council<sup>14</sup> that grapple with use class and the application of affordable housing policies:

- Even though it may be reasonable to consider individual self-contained units of accommodation as dwellings, where the proposed development forms a collection of units of accommodation with extensive communal facilities, beyond that reasonably likely to be provided in standard Class C3 accommodation, and which clearly exists to

serve the residents, both **the units and the communal facilities are intrinsic to each other and therefore, form part of the same planning unit.**

- That **planning unit as a whole** exists to provide accommodation with care, to people in need of care, falling wholly within use class C2.
- Where the units are occupied only by residents in need of, and receiving, a minimum level of care, their existence is founded on the need for, and delivery of accommodation with care, for those in need of care, in direct correlation with use class C2. Where this is secured through occupation restrictions set down within a legal agreement, the terms of the grant of permission mean it can only be used for use class C2.
- Where care and assistance is provided at additional cost to an occupant, the occupant is only likely to choose to live there if they are in need of that care and assistance.
- Care can cover a very broad range of activities that assist people in carrying out everyday tasks, which may become increasingly difficult with age. What is important is that the planning unit is designed and exists to provide care and which is capable of increasing over time. The physical attributes of the building, the interconnectivity between accommodation and facilities and the extent of communal facilities are all relevant to assessing the nature of the development.

**2.24** The fundamental point arising from this, is that these developments exist to provide accommodation with the availability of care and the provision of extensive communal facilities. With regard to these points and the guidance provided in the PPG: *“when determining whether a development for specialist housing for older people falls within C2 (Residential Institutions) or C3 (Dwellinghouse) of the Use Classes Order, consideration could, for example, be given to the level of care and scale of communal facilities provided.”*

**2.25** An Inspired Villages development has a high level of care and significant amount of facilities meaning it is clearly a C2 use.

## Definitions of care

**2.26** A definition for ‘care’ is provided in the Interpretation section (Section 2.) of the Use Classes Order, as follows:

*“care” means personal care for people in need of such care by reason of old age, disablement, past or present dependence on alcohol or drugs or past or present mental disorder, and in class C2 also includes the personal care of children and medical care and treatment.”*

**2.27** The 1987 Use Classes Order also pre-dates the formal definition of the term ‘Personal Care’ in the health legislation. For the avoidance of doubt, the term ‘Personal Care’ is now defined in the health and social care legislation, regulations and guidance, having been introduced in 2008; however, the reference to ‘personal care’ in the definition of care provided in the Use Classes Order is not synonymous with the health legislation definition, which did not exist at the time it was written. The definition in the Use Classes Order can only be taken in its practical sense, as described, i.e. ‘individual’ care to a person in need of care.

**2.28** The different approach by different local authorities has led to different operational restrictions / obligations being secured at

different sites that essentially constitute very similar development, not helped by a Use Classes Order which is now of some considerable age. This is understandably difficult to manage and unpredictable for developers of this type of development.

**2.29** To support delivery, we strongly encourage the local planning authority adopts policies that allow for the specific circumstances of the proposal to be assessed in each case, rather than seeking to pre-determine use class based on a particular characteristic; and to be clear that **affordable housing policies designed to apply to unrestricted, open market residential development do not apply to Class C2 development.** Where there is doubt, policies should provide sufficient flexibility for specific circumstances (e.g. may include viability) to be assessed through a planning application, unless specialist housing for older people had been fully considered at the plan-making stage (infrastructure, relevant policies and local and national standards, cost implications of Community Infrastructure Levy (CIL) and Section 106.<sup>15</sup>

## Evidence base and approach for local plan-making

### National planning policy context

**3.1** The National Planning Policy Framework (NPPF) 2019 stresses the importance that the needs of groups with specific housing requirements are addressed, with paragraph 61 stating *‘the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies’*, including for older people. **The PPG identifies the evidence that plan-makers should consider when assessing the housing needs of older people;** in terms

of census data, projections of population and households by age group, together with the future need for specialist accommodation for older people broken down by tenure and type (e.g. sheltered housing, extra care)<sup>16</sup>. This can be assessed from online tool kits, e.g. The Extra Care Housing Toolkit<sup>17</sup>, Housing LIN SHOP<sup>18</sup> and evidence prepared by health and well-being boards together with comparisons with other local authorities.

**“The need to provide housing for older people is critical<sup>19</sup>”**

<sup>14</sup> Paragraph 43 - Appeal Decision APP/Q3115/W/19/3220425 Land to the east of Reading Road, Lower Shiplake, 14 October 2019

<sup>15</sup> NPPG Paragraph: 015 Reference ID: 63-015-20190626

<sup>16</sup> NPPG Paragraph: 004 Reference ID: 63-004-20190626

<sup>17</sup> Care Services Improvement Partnership, Department of Health (2006) The Extra Care Housing Toolkit.

<sup>18</sup> Housing LIN (2011) Strategic Housing for Older People (SHOP) Resource Pack.

<sup>19</sup> NPPG Paragraph 001 Reference ID: 63-001-20190626

3.2 With specific regard to planning and the supply of homes for older people, the PPG sets out the following guidance for local planning authorities:

- **Set clear policies** to address the housing needs of groups with particular needs such as older and disabled people. These policies can set out how the LPA will consider proposals for the different types of housing that these groups are likely to require.
- Can provide **indicative figures or a range for the number of units of specialist housing for older people** needed across the plan area throughout the plan period.<sup>20</sup>
- Include the provision of housing for older people for **monitoring progress** when preparing the Authority Monitoring Report.<sup>21</sup>
- **Plans need to provide for specialist housing for older people where a need exists.** Innovative and diverse housing models will need to be considered where appropriate. Plan-makers need to consider the size, location and quality of dwellings needed to allow them to live independently and safely in their own home for as long as possible, or to move to more suitable accommodation if they so wish.<sup>22</sup>
- **Allocating sites** can provide greater certainty for developers and encourage the provision of sites in suitable locations, which may be appropriate where there is an identified unmet need. Location is a key consideration with factors including proximity to good public transport, local amenities, health services and town centres.<sup>23</sup>

#### Recommendation Four:

The local plan should **set indicative figures or a range for the number of specialist housing for older people needed across the plan area** and throughout the plan period and this must recognise the diverse models that exist.

#### Recommendation Five:

The local planning authority must **monitor the delivery of specialist housing for older people and deliver action plans to address under provision.**

#### Recommendation Six:

The local plan should consider the **inclusion of specialist housing for older people within appropriate strategic or other site allocations** subject to consideration of need, site and locational factors and deliverability.

## Evidence base and approach for local plan-making

### Evidence base and methods

- 3.3 From Carterwood's research,<sup>24</sup> the typical average age for entry to private extra care housing is 80 to 82 years, with an age range of 70 to 90 years forming the bulk of residents. Typically, single females occupy 65–70% of units, couples 20–25%, and single males 10%. As such, it is important to assess the relative age profile of a catchment market in order to establish the size of the population matching this demographic, both in relative and absolute terms.
- 3.4 Older people will make a conscious choice to move into an extra care scheme and own or rent their property. This also means that the choice can be a large financial decision, often coinciding with a need to leave the larger family home, as well as an emotional decision.
- 3.5 The key demographic profile is where the household reference person (HRP), as defined by the Census 2011, i.e. the decision maker of any buying decision, meets the following criteria:
- 65+ years – we know from empirical evidence that the average age of those entering private extra care is 80+ years of age, and typically those entering sheltered housing is 70+ years. Therefore, the key demographic is the 65+ year age group.
  - Owns their property outright – therefore has the required equity in their own property to form the means of being able to make a private property purchase or rental decision.
- 3.6 It is important the evidence base properly assesses supply and demand, given the substantial increase in the elderly demographic, the high proportion of home ownership for those aged 65+ and the rapidly increasing cost of caring for the elderly population. The growth in the elderly demographic is not considered the best way of predicting demand for particular types of elderly care and accommodation, as traditional residential care homes make way for new forms of accommodation and care.
- 3.7 By considering older people's preferences should they need care, The Housing LIN SHOP toolkit advises that although over 60% of people wish to remain in their home, this decision may be limited by choice rather than preference. Often a choice is made based on what is available with a decision being made following a crisis event, when need is greatest. It suggests indicative levels of provision of various forms of accommodation for older people, including extra care and enhanced sheltered housing available on a long leasehold basis or for rent.
- 3.8 In 2004, Kerslake and Stilwell<sup>25</sup> estimated that about one-third of the population entering a care home '*could have moved to a form of housing with care as a viable alternative, with a further third who could have managed in such housing had they moved at some time earlier in their care history*'. Other models for estimating demand for supported housing and housing markets and independence in old age include Ball (2011).<sup>26</sup>
- 3.9 LaingBuisson's 'Extra Care Housing UK Market Report'<sup>27</sup> does not provide a tool for assessing demand, but instead refers to the demographic factors that are likely to influence demand, as follows:
- An expansion of the older population;
  - A reduction in the pool of young adults available for training as nurses or care assistants to work in the community or care homes;
  - An increase in the number of middle-aged people looking after children and a parent;
  - An increase in the proportion of older people with a living child;
  - Changes in the health and dependency levels of older people; and
  - Changes in the patterns of immigration by potential care workers and emigration by trained care staff.

<sup>20</sup> NPPG Paragraph: 006 Reference ID: 63-006-20190626

<sup>21</sup> NPPG Paragraph: 007 Reference ID: 63-007-20190626

<sup>23</sup> NPPG Paragraph: 012 Reference ID: 63-012-20190626

<sup>24</sup> NPPG Paragraph: 013 Reference ID: 63-013-20190626

<sup>24</sup> Carterwood Focus, Issue 13 (2014) Extra care housing – where do residents come from?

<sup>25</sup> Kerslake, A and Stilwell, P (2004) What makes older people choose residential care, and are there alternatives? Housing Care and Support

<sup>26</sup> Ball, M (2011). Housing Markets and independence in old age: expanding the opportunities. Henley, University of Reading

<sup>27</sup> LaingBuisson (2015) Extra Care Housing UK Market Report, Thirteenth Edition

**3.10** LaingBuisson's Age Standardised Demand (ASD) rates for care home beds shows a trend whereby demand for residential care beds has reduced as alternatives to residential care are developed.

**3.11** The use of comparative evidence and indicators from a variety of sources is a useful method to ascertain the indicative level of need for extra care in a particular local authority area. There will remain other accommodation options available, in addition to retirement communities, including remaining in their own homes, moving to traditional sheltered housing, a care home or to another informal care setting. Most importantly, it is necessary to have a full understanding of the various forms of care and accommodation, knowledge of schemes and their availability, and input from a range of sources to determine appropriate indicative levels of need over the plan period (including existing shortfalls).

**3.12** The methods of determining demand in a given area reveal a clear message; that **there is a strong and increasing demand for new forms of care and accommodation as an alternative to traditional residential care**, alongside an increased requirement for nursing and dementia care homes for those with the highest care needs. The difficulty in trying to accurately assess demand for extra care housing is that, due to the relatively new nature of the product, there is no position of over-supply upon which to assess a position of balance. Essentially, the additional supply creates 'demand' when it is developed.

**3.13** The government's response to the Inquiry into Housing for Older People (2019),<sup>28</sup> included the following points and which the local authority should consider in their plan preparation:

- *'We have a rapidly ageing population. The needs of older people are now different from previous generations and their aspirations around housing and lifestyles have changed dramatically.'*

- **Offering older people a better choice of accommodation can help them to live independently for longer, improve their quality of life and free up more family homes for other buyers.**

- *We recognise that the **integration of housing with health and social care services is a vital part of ensuring that people are able to live healthier, more independent lives for longer.***

- *We agree that more older owner-occupiers, living in low value housing, should have the opportunity to move to more appropriate housing as they age. At present, new commercial specialist older people's housing tends not to cater for this market while new supported housing is largely targeted at the most vulnerable. We are keen to encourage innovative approaches, especially from local authorities and housing associations.*

- **More of all types of housing for older people – extra care, sheltered and accessible housing – need to be built across the social and private sectors.**

- *Older people moving home in later life could be part of the solution to tackling the housing shortage but there is little evidence to support this. We agree that further research into the impact of older people moving home on the housing market could contribute to a stronger evidence base to inform policy making.*

- *It is important that providers use clear terminology (with regard to the different types of specialist housing), so that people can make informed choices.'*

**“There is a strong and increasing demand for new forms of care and accommodation as an alternative to traditional residential care.”**

## Evidence base and approach for local plan-making

**3.14** The government's Social Care White Paper, 'Caring for our Future',<sup>29</sup> committed to provide **support to help local authorities develop their market capacity to provide greater choice for users and drive up quality in care services.** The Developing Care Markets for Quality and Choice programme, launched by the Department of Health in 2012, is intended to support local authorities to improve capacity through **preparing or improving their market position statements.**

**3.15** The 2013 'Top of the Ladder' report by Demos,<sup>30</sup> the leading cross-party think tank, provided some key findings:

- *'Retirement properties make up just 2% of the UK housing stock, or 533,000 homes, with just over 100,000 to buy. One in four (25%) over-60s would be interested in buying a retirement property – equating to 3.5 million people nationally.'*
- *More than half (58%) of people over 60 were interested in moving. More than half (57%) of those interested in moving wanted to downsize by at least one bedroom, rising to 76% among older people currently occupying three, four and five-bedroom homes.*
- *If just half of the 58% of over-60s interested in moving (downsizing and otherwise) were able to move, this would release around £356 billion worth of (mainly family-sized) property – with nearly half being three-bedroom and 20% being four-bedroom homes.'*

**3.16** The report suggested a number of national policy recommendations to assist in overcoming these problems:

- *'Giving retirement housing special planning status akin to affordable housing, given its clear and demonstrable social value.'*

**“One in four (25%) over-60s would be interested in buying a retirement property.”**

- *Tackling S106 and community infrastructure levy (CIL) planning charges, which make many developments untenable and affect them disproportionately compared with general needs housing developments'.*

- *Quotas and incentives for reserving land for retirement housing, and linking this to joint strategic needs assessment and health and well-being strategies for local areas.'*

**3.17** Inspired Villages recommends clear policies in development plans to support new retirement communities. The evidence is clear, as are the benefits to support the approach and deliver much-needed specialist accommodation for the elderly.

**3.18** The 'Shining a Spotlight on the hidden housing market' report included a survey of 200 individuals from a variety of backgrounds in the UK later living sector, from local authorities to private developers, care operators and designers. Some 97% of respondents thought that the development of later living accommodation would play a key role in alleviating the housing crisis and 73% thought that the demand for later living accommodation would significantly increase in the next 5 years, while 89% felt that planning laws would need to change to boost later living development and 33% are calling for a 'Retirement Villages Act'.

**3.19** Some of the strategic recommendations from the report is that there should be legislative and policy suggestions for local and national government, including reform of planning policies, tax breaks for older people looking to 'right-size', and the appointment of a dedicated minister responsible for the needs of older people.

<sup>28</sup> Government response to the second report of 2017-2019 of the Housing, Communities and Local Government Select Committee Inquiry into housing for older people. (September 2018)

<sup>29</sup> HM Government (2012) Caring for our future: reforming care and support  
<sup>30</sup> Wood, C (2013). The Top of the Ladder. Demos

## Local planning authority plan-making

- 4.1 Many local authorities are increasingly aware of the variety of accommodation and care options available to enable the elderly to receive care within their own homes, and as a more cost-effective alternative to residential care. In certain areas, they are considering the potential for the reconfiguration of dated and under-used sheltered housing stock to provide additional, affordable extra care housing.
- 4.2 In reality, upgrading sheltered housing to extra care suitable for those with increasing care needs is rarely the most efficient solution, as existing developments are often too small to enable the required economies of scale to deliver 24-hour on-site care, nor are they able to provide the layout and additional communal facilities necessary to form a genuine extra care community.
- 4.3 Housing LIN consider that the later living market needs to be made both acceptable and financially viable to enable older people to move from unsuitable accommodation (too large to manage, costly to maintain, poorly located or ill-equipped to deal with changing needs) to better, thoughtfully designed homes in sought-after places. *'Right-sizing does not mean a compromise on design'* and new homes that are accessible and adaptable and can meet with the current and future lifestyle goals of potential residents.
- 4.4 There is a strong wish for older people to remain independent for as long as possible, and extra care housing appeals to this desire. The key issues leading people to move into extra care are health and care requirements, frequently prompted by the death of a spouse or partner. The decision to move is often strongly influenced by immediate relatives, and the more frail or vulnerable the elderly person, the more this applies. Aspects such as accessibility and convenience for visiting play a major role in the decision making.
- 4.5 An estimated six million people provide significant support to elderly relatives, neighbours and friends across the UK. This factor contributes additional demand, as carers understand the benefits associated with their charges moving to an environment where some of the care burden can be shared, allowing them to remain, sometimes indefinitely, outside of the care home environment. Additionally, the family is often involved in a decision to move a loved one to an extra care scheme located more conveniently, so that regular visits are more easily made and concerns over 'welfare at a distance' can be eliminated.
- 4.6 In 2019, ARCO partnered with ProMatura to conduct the biggest ever study of retirement communities,<sup>30</sup> with surveys of residents representing 81 communities and 15 different care operators, which provided evidence of the huge health, wellbeing and security benefits for residents.
- 4.7 The main reasons given for moving to a retirement community were cited as being: less need for property maintenance, access to communal facilities, and the availability of 24-hour support and domiciliary care on site. The benefits of living in extra care included: being more active and healthier for longer, the ability to enjoy life, having greater control, and feeling safe and secure, with a consequent reduction in loneliness.
- 4.8 The **resultant recommendations for action** set out, amongst others, that the government and local authorities should:
- *'Develop a legal and regulatory framework for Retirement Communities to bring the UK into line with leading countries around the world*
  - *Develop a clear definition and terminology for Retirement Communities and recognise the significant contribution they are making to our health and social care systems*
  - *Provide more funding and land for affordable housing in Retirement Communities*
  - *Undertake further research on the level of Retirement Community supply and demand in their areas*
  - *Ensure they have provisions in their local plans for Retirement Community housing*
  - *Partner with specialist Housing Associations with expertise in extra care Retirement Communities to increase provision.'*

<sup>30</sup> ARCO with research by ProMatura International (2019) Housing, Health and Care. The health and wellbeing benefits of Retirement Communities.

## Local planning authority plan-making

- 4.9 Tailored housing that is accessible, well designed and well located for facilities may reinvigorate a person's social life through their offer of a wide range of activities and communal areas that provide opportunities for making new friends. There is evidence that residents have better health outcomes than older people living elsewhere; designs that minimise the risk of falling, for example, and social facilities that reduce feelings of loneliness.
- 4.10 By providing an attractive alternative type of accommodation in the form of extra care housing, older homeowners may benefit from releasing equity from their existing properties, which they can use to fund their retirement years. Extra care housing can also contribute to addressing wider housing market concern, by releasing their homes onto the market for families.
- 4.11 There are other benefits in promoting care villages as they can reduce the demand upon health and social care. Research from Aston Research Centre<sup>31</sup> in 2015 set out that the NHS saved more than **£1,000 per year on each resident** living in Extra Care Charitable Trust's schemes between 2012 and 2015. The Homes for Later Living 'Healthier and Happier' report<sup>32</sup> suggests that each person living in older people's housing contributes to a fiscal saving to the NHS and social care of approximately **£3,500 per annum**. Inspired Villages typical model providing 150 units would generate a population of approximately 195 residents (average occupancy 1.3 persons per unit) being **equivalent to over £680,000 savings to the NHS and social care every year, a significant benefit**.
- 4.12 As an operator, unlike residential developers, Inspired Villages considers the long-term ownership and management of the site; therefore, it is vital that we secure suitable sites and planning permissions that allow the implementation of a viable development. It is often very difficult for an operator, such as Inspired Villages to secure sites on the open market due to competition from residential developers who do not provide the level of facilities or care that a retirement community does.
- 4.13 The inclusion of positive policies to support extra care housing could give landowners an incentive to proceed with this type of development over a residential developer and can be partly justified on the basis that extra care / retirement community developments are relatively self-contained (because of the extensive communal facilities on-site); lower traffic generation, which are predominantly off-peak (because residents do not commute to work); are employment generators; and can result in savings to the NHS and adult social care, amongst other significant benefits.
- 4.14 We recommend that the local planning authority properly engages with the extra care sector regarding the potential for including this form of development in strategic site allocations to ensure this would be deliverable, or an appropriate site location. The sector is an emerging market and operators do not tend to have strategic land, meaning they may not be able to promote potential sites at the time the local plan is being prepared.
- 4.15 To avoid being prejudiced, LPAs should consider whether policies allow for a greater degree of flexibility for proposals for specialist housing for older people on land that may otherwise be inappropriate for standard residential development, for example, adjacent to settlement boundaries where those settlements provide a certain level of services and facilities. Such a policy approach has been applied in local planning authorities, such as Hart District, South Northamptonshire and Horsham District. (See examples at back of document.)

### Recommendation Seven:

The local plan and its evidence base **must recognise the significant benefits associated with specialist housing for older people** and this can inform planning decision making.

<sup>31</sup> Holland, C (2015) Collaborative Research between Aston Research Centre for Healthy Ageing (ARCHA) and the ExtraCare Charitable Trust

<sup>32</sup> WPI Strategy for Homes for Later Living (2019) Healthier and Happier; An analysis of the fiscal and wellbeing benefits of building more homes for later living

## Local planning authority plan-making

### Recommendation Eight:

The local plan should set out different policy requirements, for example, affordable housing, for specialist housing for older people (C2 use) compared to residential development within the C3 use class and the evidence base, viability must be taken into account the different circumstances between the uses (e.g. retirement communities / extra care provide significant levels of communal facilities / non saleable floorspace and their ongoing maintenance and management, staffing, funding, etc). Where there is doubt, policies should provide sufficient flexibility for specific circumstances, which may include viability, to be assessed through a planning application.

**4.16** Inspired Villages recognises that some local planning authorities have specifically considered the need for policies to be adopted to support the delivery of affordable extra care type housing, but Inspired Villages is concerned to ensure that local planning policy also gives sufficient policy support for the full range of specialist housing provision to serve older people, including private sector extra care housing / retirement communities, as set out in the definitions of specialist housing in the PPG. The need identified for both affordable and private tenures, and **LPAs have a duty to plan for the delivery of development to meet all housing needs.** The 'critical need' has been identified in the PPG and the requirement to ensure

sufficient land is available to address housing requirements of groups with specific needs and incorporate policies that deliver housing for all is identified at **paragraphs 59 and 61 of the NPPF.** Private sector retirement community developments are one of the options (along with care homes, affordable models, and sheltered housing) that will contribute towards addressing the need.

**4.17** In addition to responding to this duty, **planning policies that support the delivery of specialist housing for all older people, regardless of financial means, are of significant benefit to social care and NHS funding.** This is because, individuals who plan for their future by using their own private financial means to secure accommodation in a setting that supports their health and wellness, without or before the need to call on the NHS and social care, will significantly reduce their need to draw on these socially funded services. LPAs should not underestimate the beneficial effect that supporting development proposals that facilitate people to fund and plan for their own health and wellness.

**4.18** We therefore strongly encourage the **LPA produce policy, which supports the delivery of specialist housing to meet the needs of older people in line with the requirements of the NPPF and the PPG** which states *"where there is an identified unmet need for specialist housing, local authorities should take a positive approach to schemes that propose to address this need."*<sup>34</sup>

### Rectory Homes Judgement

Rectory Homes Ltd sought permission for 'the erection of a 'Housing with Care' development (use class C2) for 78 open market extra care dwellings and a communal residents centre' in Thame, South Oxfordshire. Both the applicant and the local planning authority were in agreement that the proposed use fell within use class C2, but there were differing opinions as to whether an affordable housing contributions was required.

The question to be determined by the Court was whether the proposed C2 units were 'dwellings' for the purpose of the development plan policy. The Court concluded that units of accommodation that allow for independent living comprise dwellings despite falling within use class C2 meaning that an extra care development may be caught by a widely drafted policy requirement to provide affordable housing.

As a consequence the decision has the potential to cause significant difficulties for the sector, resulting in an increased reliance on viability assessments, resulting in further cost and uncertainty in the planning process. This has the potential to disincentivise delivery of a much-needed form of specialist accommodation in circumstances where providers are already at a disadvantage against traditional residential developers due to the inherent costs within a retirement community development.

It is important that the drafting of affordable housing is precisely worded to reflect its applicability to C3 residential dwellings, particularly where the Council's evidence base viability work has not assessed retirement communities.

<sup>34</sup> NPPG Paragraph: 016 Reference ID: 63-016-20190626

## Examples of other local authorities taking a similar policy approach

### Hart Local Plan Strategy and Sites 2016-2032 (as of April 2020 local plan pending adoption):

#### *Policy H4 - Specialist and supported accommodation (as per main modifications)*

Proposals for specialist and supported accommodation that meets the needs of older persons or others requiring specialist care will be permitted:

- a) On sites within settlement boundaries and within the new community at Hartland Village; and
- b) On sites in the countryside provided:
  - i. There is a demonstrated local need for the development in that area; and
  - ii. There are no available or viable alternative sites within settlement boundaries where the need arises; and
  - iii. The site is well related to an existing settlement with appropriate access to services and facilities either on or off site.

### South Northamptonshire Part 2 local plan (Emerging):

#### *Proposed policy LH6 - Specialist housing and accommodation needs (including proposed modifications)*

Proposals to meet older persons / specialist housing needs for two or more dwellings will be supported on suitable sites that are within the settlement confines subject to the following criteria:

- a) The location is well served by public transport or within walking distance of community facilities (within 400m) such as shops, medical services, public open space, and social networks appropriate to the needs of the intended occupiers, or where this is not the case, such facilities are provided on site; and
- b) The scale, form and design of the development is appropriate to the client group and in relation to the settlement where it is located; and
- c) Highway, parking and servicing arrangements are satisfactorily addressed; and
- d) Gardens and amenity space are provided and are of an appropriate size and quality.

Proposals for older persons / specialist housing on suitable sites immediately adjacent to the settlement confines of Rural Service Centres and Primary Service and Secondary Villages (A) should meet all of criteria (a) to (d) above and:

- e) The scale of development should be clearly justified by evidence of need in the district; and
- f) Evidence is provided which demonstrates that there are no alternative suitable available sites within the adjacent confines

### Horsham District Planning Framework (November 2015)

#### *Policy 18 Retirement Housing and Specialist Care*

1. Proposals for development which provide retirement housing and specialist care housing will be encouraged and supported where it is accessible by foot or public transport to local shops, services, community facilities and the wider public transport network. The Council will particularly encourage schemes that meet identified local needs for those on lower incomes and provide affordable accommodation for rent or shared ownership / equity.

2. Large scale 'continuing care retirement communities' will be supported in appropriate locations, normally within defined built-up areas, where they can be justified in terms of meeting identified need, and:

- a) Provide accommodation for a full range of needs, including care provision separate from the self-contained accommodation;
- b) Include 'affordable' provision to meet identified local needs, or where this is not possible, provide an appropriate commuted sum in lieu of on-site units; and
- c) Include appropriate services and facilities, including transport, to meet the needs of residents / staff and which contribute to the wider economy.

### Vale of Aylesbury District Council Main Modifications

#### *Suggested new policy - H6b Housing for older people - in addition to identifying two site allocations and four broad locations for the provision of C2 accommodation, also proposes:*

3. Proposals for C2 older people accommodation, planning permission will be granted subject to the following criteria:

- a) The proposal is in a sustainable location for amenities and services
- b) There is an identified package of care provision on site
- c) Minimum Clinical Commissioning Group inspected space standards are met or exceeded
- d) Facilitates social and recreational activity
- e) Guest accommodation per unit (unless the proposal is for Extra Care Sheltered Accommodation)



# PLANNING STATEMENT

INCLUDING STATEMENT OF COMMUNITY INVOLVEMENT



## RESERVED MATTERS

## LAND EAST OF HORNDEAN, EAST HANTS

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# PLANNING STATEMENT RESERVED MATTERS - LAND EAST OF HORNDEAN



## DOCUMENT CONTROL

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Cover image courtesy of Pozzoni Architecture, <https://www.pozzoni.co.uk/>

## **CONTENTS**

- 1.0 INTRODUCTION**
- 2.0 INSPIRED VILLAGES**
- 3.0 SITE AND SURROUNDINGS**
- 4.0 RELEVANT PLANNING HISTORY**
- 5.0 THE PROPOSALS**
- 6.0 STATEMENT OF COMMUNITY INVOLVEMENT**
- 7.0 CONSIDERATION OF PROPOSALS**
- 8.0 CONCLUSION**

## **1.0 INTRODUCTION**

**1.1** Highwood has been appointed by applicants, Senior Living (Horndean) Limited, on behalf of Inspired Villages (IV) to prepare and submit a reserved matters application for a proposed care village at Land East of Horndean (north of Rowlands Castle Road, Horndean).

**1.2** The application description is:

*‘Application for approval of reserved matters pursuant to outline permission 55562/007 (layout, scale, appearance and landscaping) for Phase 2, a care village comprising a village care centre (VCC) incorporating up to 60 no. care-assisted living apartments and up to 60 no. C2 (age restricted) units comprising bungalows and apartments, (C2 Use), communal facilities, energy centre, maintenance building and other ancillary structures, parking, drainage, landscaping, and other associated works’*

**1.3** The site comprises 3.18 ha of land located north of Rowlands Castle Road, Horndean and forms part of a wider site that was granted outline permission in 2021 under **55562/007** for,

*‘Development of a care village comprising a 60-bed care home, a village care centre (VCC) incorporating up to 60 no. care-assisted living apartments and up to 60 no. C2 (age restricted) units comprising bungalows and apartments, with associated parking, landscaping and sustainable drainage’.*

**1.4** All matters other than access were reserved on application /007.

**1.5** This application for IV follows the approval of Phase 1 reserved matters for a care home in April 2021 (application 55562/009), for which works commenced on site in October 2021. It is accompanied by an application for the discharge of various pre-commencement conditions that were attached to the outline permission.

**1.6** This statement describes who the operator Inspired Villages is, the nature of the proposed development, the significant need for specialist accommodation for older people and the significant benefits associated with the delivery of a retirement

## PLANNING STATEMENT RESERVED MATTERS - LAND EAST OF HORNDEAN



community. It also describes the application site, summarises relevant planning history and provides a description of the proposed development. National and local planning policy and guidance and other relevant material planning considerations are set out and the proposals then assessed against them. The case in favour of granting approval for the reserved matters is set out in the concluding section.

- 1.7 This statement must be read alongside all accompanying application submission documents as detailed on the submitted, 'Application Documents and Drawings List'.

## **2.0 INSPIRED VILLAGES**

- 2.1** Inspired Villages (IV) is a developer and operator of care villages in the UK, more widely known as ‘retirement villages’. The IV model is based on the concept of encouraging and facilitating “wellness” in older people, by providing a suitable, safe and secure environment where care and assistance, tailored to suit individual’s needs, can be provided within peoples’ homes, on a flexible individual basis which can be increased over time. The entire principle is that the whole development is designed such that the delivery of assistance, care and promotion/encouragement of wellbeing is integrally facilitated by the site as a whole and its operational management. Although IV is not a provider of the regulated activity of Personal Care, the developments are designed such that residents can arrange for their own care requirements to be received in a suitably designed environment. The reason for this is that, under health legislation, people must retain choice over who provides their care.
- 2.2** This concept means that when a person starts to plan for later life, to acknowledge the need for assistance with everyday tasks, or a requirement for care, they can move to a new home in an environment that can facilitate the delivery of this on their terms. A care village offers the choice for older people, to put themselves in a place specifically designed to maximise their wellbeing, whilst maintaining the dignity and privacy of their own front door. Where one individual within a couple has greater care needs than the other, this can be provided for in a way that allows for them both to continue living comfortably on their home.
- 2.3** The care village model takes the form of a “core building”, the Village Care Centre (Village Centre or ‘VCC’), and surrounding purpose designed specialist accommodation. The Village Centre Building will provide a number of communal facilities focused on facilitating wellness, many of which are also available for eligible members of the wider community to use. These facilities may vary, but will always include a minimum provision and design standard, as discussed in more detail below. The specialist accommodation takes the form of ‘extra care’ units (Use Class C2) that have been very carefully designed to incorporate features that allow for practical living for older people and the delivery of care and assistance safely within that setting, which can be increased over time as necessary. The point is that these

features (and the capability for them to be increased) are thoughtfully integrated into a home, as standard, and except for in extreme circumstances, would negate the need for a resident to move into an institutional care home, because whoever delivers their care can do so in this setting.

#### **WHAT IS 'EXTRA CARE'?**

- 2.4 There are various published definitions of “extra care” accommodation, including from the Royal Town Planning Institute; Care Quality Commission; the Department of Health; and Housing LIN. The common themes of these definitions include that the accommodation is purpose built or specialist; that it is designed such that varying levels of care can be offered and received (and increased over time); and that it offers communal facilities and/or community living.
- 2.5 Housing LIN published Factsheet 1: “Extra Care Housing – What is it in 2015?” in November 2015. It provides the following definition: “Extra care housing is housing with care primarily for older people where occupants have specific tenure rights to occupy self-contained dwellings and where they have agreements that cover the provision of care, support, domestic, social, community or other services. Unlike people living in residential care homes, extra care residents are not obliged as a rule to obtain their care services from a specific provider, though other services (such as some domestic services, costs for communal areas including a catering kitchen, and in some cases some meals) might be built into the charges residents pay.” Although Inspired Villages are not a provider of the regulated activity of personal care, the developments are designed such that residents can arrange for their own care requirements to be received in a suitably designed environment and we will nominate a preferred care provider. Inspired Villages works with Bluebird Care on 5 of the 6 operating villages, although residents are free to commission any care provider to meet their care needs.

#### **FEATURES OF AN IV CARE VILLAGE THAT DIFFERENTIATE IT FROM STANDARD RESIDENTIAL ACCOMMODATION**

- 2.6 The features described below will be offered in all IV villages. The subtle incorporation of these design features to the buildings from the outset are the physical attributes that make these developments represent ‘specialist housing’.

- 2.7 They cater for the specific needs of older people as they age, alongside planned management of care and assistance, in a way that cannot be delivered in standard Class C3 Dwellinghouses.
- 2.8 Furthermore, to deliver this, the site must be managed and operated as a whole in accordance with the requirements of the associated S106 legal agreement provisions that require a minimum occupant age of 65, a qualifying persons assessment to be undertaken and minimum care package to be provided. A single apartment cannot be separated from the wider operation, and so the site as a whole constitutes one Class C2 planning unit.

### **COMMUNAL FACILITIES**

- 2.9 The village incorporates a wide range of communal facilities specifically designed and operated to promote physical and mental health and wellbeing. Communal services and facilities include:
- **Wellbeing Centre:** Offering a mix of exercise, relaxation and therapeutic facilities, suitable to accommodate physiotherapy and rehabilitation activities, as well as group exercise classes that promote movement and social activity. Equipped with a treatment suite that can be made available for health practitioner visits; and a salon for hair, manicure and pedicure treatments. All these facilities are designed with accessibility in mind, with level access, fixing points for lifting equipment, and due consideration to things such as lighting, clear signage and counter top and WC seat heights. Disabled changing and WC rooms are equipped accordingly, and toilet facilities are numerous and located close to all communal facilities. There is clear evidence that regular exercise activities significantly help to improve balance, strength and flexibility thereby reducing the risk of falls, a significant contributor to a decline in health. Meaningful community activities also enable interaction and engagement which helps to reduce the risk of isolation and loneliness, a significant contributor to poor health in later life.
  - **Restaurant:** A communal restaurant provides the opportunity for residents to “eat out” and entertain in a facility that is easily accessible from their home. It encourages community and interaction with other residents and staff, with regular organised events aimed at getting people together. Residents can choose to have meals cooked in the restaurant or served to them in their own home.

Menus and ingredients are carefully designed and selected to offer a healthy and nutritious diet.

- **Studio rooms/Library/Meeting space:** Each village has a range of multi-functional meeting spaces and communal rooms, aimed at encouraging an active and engaged community. Residents organise, with support if required, an extensive range of events and activities, including book clubs, Bridge clubs, language circles, lectures and talks, U3A events (U3A is an informal, co-operative, volunteer-led organisation for retired people across the UK).
- **Transport Service:** Each village will provide a transport service, typically comprising a minibus and/or electric taxi (capable of accommodating wheelchair users) and drivers available to assist residents in making pre-arranged trips around the local area. An effective and flexible transport service is an essential part of the village services. In terms of facilitating social outings, shopping and enabling residents to have easy access to GP services, hospital appointments and support networks.
- **Landscaped Grounds:** Each village includes well planned, landscaped and managed external amenity spaces for use and enjoyment by residents.
- **Back of House and Staff Facilities:** The above communal facilities require a variety of back-of-house and service areas to be provided within the core building to facilitate their operation. Staff areas, such as a lounge, changing rooms and W/Cs will also be included.

## **ACCOMMODATION**

**2.10** Extra care bungalows are specialist units of accommodation, incorporating the following features:

- An emergency call system with 24 Hr On site team
- **Level Access:** The majority of buildings incorporate level access across the ground floor, and lift access to upper floors. Doorways are also widened to facilitate wheelchairs, mobility scooters, etc.
- **Maximised Natural Daylight:** By maximising windows doors and balconies, in number and size. Usable balcony areas or patio areas for all units.
- **Internal Room Layout/Fit Out:** Kitchen work tops and wall cupboards are lowered to

be in reach without straining. Ovens, microwaves, fridges and freezers are installed at a suitable height to avoid bending down or stretching up to access them. Induction hobs that are cool to touch after use are installed. In the bathroom, WC seats are set higher, washbasins can be installed at a suitable height for a wheelchair user and shower trays are specifically designed to stop water spread across the whole room, but avoid the need to step up or down to access. The bathrooms do not have grab rails or specific equipment installed as standard, but are designed to accommodate them as and when this is needed by the resident, so that they are appropriately installed to meet their specific needs.

- **Connectivity:** Apartments are equipped with tablets (similar to an iPad) that allow communication with staff in the Core Building. They can also be linked to monitors around the apartment that can trigger alerts if someone is to have a fall, leave a bath running, forget to switch off the oven, or miss taking medication. Wellbeing Navigators will assist in organising workshops and lessons on how to use this technology for residents that may benefit from this.

#### **INSPIRED VILLAGES RESIDENTS**

- 2.11** The current average age of an Inspired Villages resident is 79 years on entry. Over 82% of residents are currently over the age of 75. They make the decision to move to an Inspired village for a number of reasons but would typically be because they find it increasingly hard to look after their own home; may have had a health issue; or their spouse or partner may have died. Residents move to an Inspired village to stay independent for as long as possible but with the peace of mind provided where they can access on-site facilities and the care offer that is available. Over 60% of the properties are single occupiers, with the remainder being couples. Average occupancy per unit is 1.3 persons.
- 2.12** Inspired Villages are full members of The Associated Retirement Community Operators (ARCO) and are an approved operator under the ARCO Consumer Code [www.arcouk.org/arco-consumer-code](http://www.arcouk.org/arco-consumer-code) which provides a benchmark for good practice within the sector. ARCO is the main body representing the retirement community sector in the UK and was formed in 2012. Their members include both private and not-for-profit members, comprising about half of the retirement community sector.

### **MANAGEMENT SERVICES**

- **A Village Manager:** The Village manager and their team are there to ensure the smooth management of the village services. Ensuring that residents receive the best service.
- **A Wellbeing Navigator:** A senior member of the management team on-site. The primary role being to connect residents to each other and the available facilities and services to meet their needs, either within the village or external, to promote their wellbeing.
- **Reassurance Response:** A 24-hour-a-day/7-days-a-week call out response, co-ordinated through the central reception.

### **STAFFING**

**2.13** In addition to the staff involved in the Management Services listed above, as a minimum, the following staff will be on-site:

- **Security Staff/ Night Porters:** On-site 24-hours-a-day/7-days-a-week, to provide reassurance to vulnerable residents.
- **Domestic Assistance:** All residents will receive domestic help as part of the service package, covering household maintenance and cleaning. Further domestic assistance is available to be arranged through the Wellbeing Navigator where required.

**2.14** A typical Inspired village of around 150 units, once fully complete, will directly employ approximately 30 to 35 staff in a range of roles including management and administration, catering, housekeeping, gardeners, maintenance, gym instructor, and hairdresser. In addition, there will be carers (employed by a care provider) providing care to residents, as well as sales staff.

### **REGISTERED CARE PROVIDER**

**2.15** At each site, IV will carry out an extensive review process (including reviewing Care Quality Commission (CQC) inspection records, values, capacity and flexibility) to identify recommended Registered Domiciliary Care Providers that may provide Personal Care to residents. However, under Health and Social Care legislation, individuals must retain choice over which Registered Care Provider they choose to

deliver their care; therefore, the delivery of the regulated activity of Personal Care is not included within any IV agreement, as this contract must be direct between the resident and the Registered Care Provider. IV's Wellbeing Navigators will assist with the practical arrangements to facilitate the introduction of Registered Care within the resident's accommodation, which can be tailored to their needs and available 24 hours a day, 7 days a week.

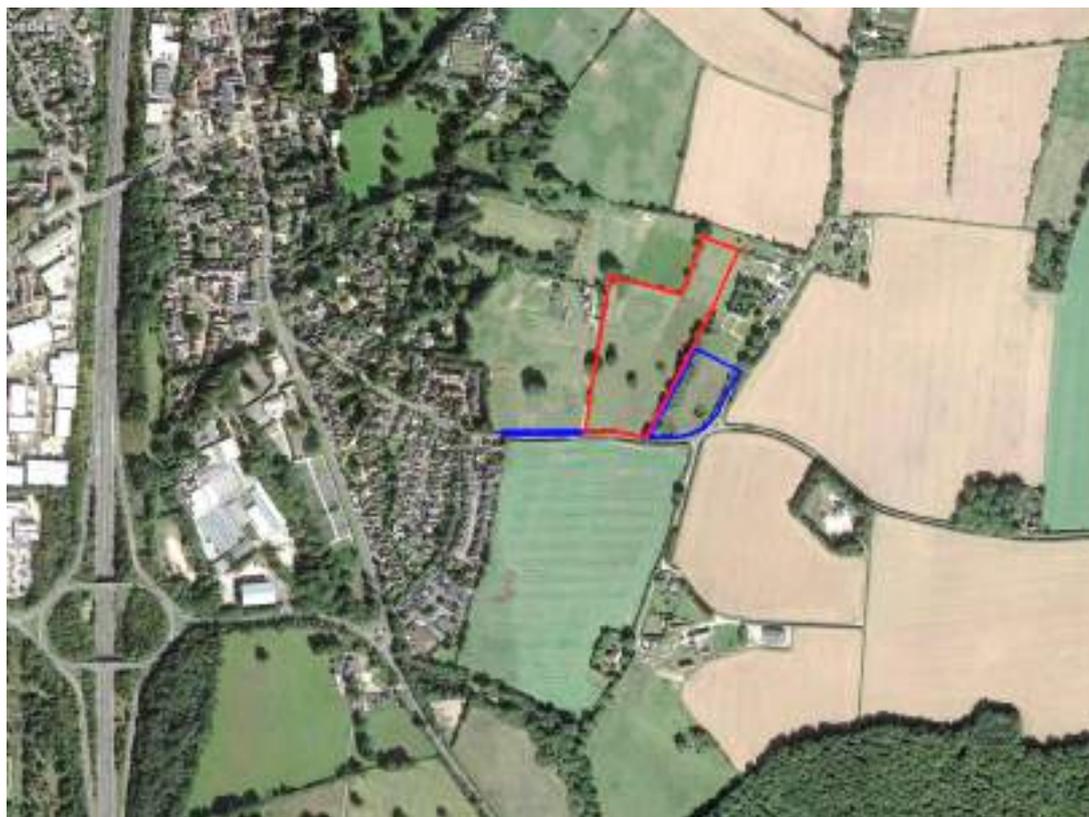
**2.16** The Registered Care Provider will employ the following staff who are likely to deliver the required care on-site:

- **Qualified Care Manager:** Who will coordinate the delivery of personal care within the village.
- **Care Workers:** The On-Site Care Provider's team will include trained carers who can provide assistance with personal care.

**2.17** To ensure the extra care units are only occupied in such a way that would represent C2 Use of the land in perpetuity, occupation restrictions have been down within the Section 106 legal agreement that was entered into at outline planning stage and applies to the application proposals.

### **3.0 SITE AND SURROUNDINGS**

- 3.1** The site comprises an area of land located north of Rowlands Castle Road, Horndean in East Hampshire district.



Site Location Plan – showing application site in red and other phases of Outline permission area in blue

- 3.2** The application site lies to the east of Horndean in Hampshire, approximately 10.5km north of Portsmouth and south of Petersfield, which are both linked by the A3(M)/A3.
- 3.3** The site forms the northeastern parcel of land that was allocated under East Hampshire District Local Plan policy HN1: Land East of Horndean and which has been subject to several outline planning permissions over several years. A wider development site comprising 62.5 hectares of land extends beyond the application boundary to the south and west.
- 3.4** This application relates to 3.18 hectares of land north of Rowlands Castle Road and west of Pattersons Lane, which was part of two outline permissions in 2020 relating to a wider 4.39 hectare site.

- 3.5 The site is currently enclosed by hedgerow to the south, which provides screening along Rowlands Castle Road and to the east by the Phase 1 care home site, separated by a band of mature trees running north to south along the boundary between the two phases.
- 3.6 Fields and paddocks are located to the south of Rowlands Castle Road, albeit this area is currently proposed for the mixed-use development including up to 800 dwellings, 2ha of employment land, a local centre and community facilities (EHDC ref: 55562/005). There is also a previous outline approval for development on this area (55562/001).
- 3.7 Hedgerows and fencing forms the northern boundary with fields located beyond. The eastern boundary of the northernmost part of site is shared with that of the Grade II Listed, Hook Cottage.
- 3.8 Land immediately to the west of the site comprises further paddock and is the subject of a current planning application by Bloor Homes for a cricket pitch and age restricted apartments (ref: 55562/006).

## **4.0 RELEVANT PLANNING HISTORY**

4.1 The following provides a summary of the recent planning history of the site.

4.2 The application site forms part of adopted Local Plan (Part 2) allocation HN1 - Land East of Horndean.

### **55562/001 – ORIGINAL OUTLINE**

4.3 Outline permission was granted with all matters reserved (except for access to the highway network and associated off-site highway improvements) for the demolition of existing buildings and the development of a maximum of 700 dwellings, approx. 1.7ha of employment land, a local centre (including local retail, a primary school and community facilities, a Care Village, playing pitches, a cricket pavilion (including associated access and parking), allotments (including associated building and car parking), acoustic bunds and ecological buffers together with internal access network (including footpaths and cycleways), drainage works, associated landscaping and open space (including play areas). **Granted February 2016.**



Illustrative Masterplan – EHDC Ref. 55562/001 – WYG

**55562/003 – DEED OF VARIATION**

- 4.4 A deed of variation application to amend the section 106 legal agreement associated with 'Area A' of the /001 permission was approved under 55562/003.

**55562/004 – REQUEST FOR SCOPING OPINION**

- 4.5 Request for Scoping Opinion – Residential development for about 700 dwellings, a care village including independent living units and extra care provision for older people, land for about 2ha of B1 (business) and B2 (industrial) uses and a new primary school and land for future expansion. **Issued September 2018.**

**55562/005 – BLOOR - NEW OUTLINE**

- 4.6 An outline planning application was submitted in December 2018 by Bloor Homes with all matters reserved, except means of access to the highway network and associated highway improvements for development of land south of Rowlands Castle Road. The application consists of the demolition of existing buildings and the residential led (C3) mixed-use development of the site with up to 800 dwellings, 2ha employment land (B1 and B2), Local Centre, financial and professional services, restaurants, cafes and drinking establishments, a primary school and community facilities. **Approved with S106 23 December 2021.**

**PLANNING STATEMENT  
RESERVED MATTERS - LAND EAST OF HORNDEAN**



Application 55562/005 – Illustrative Masterplan rev K – Bloor / Barton Willmore – Showing extent of development proposed south of Rowlands Castle Road (south of this reserved matters application site)

**55562/006 – BLOOR – OUTLINE NORTH OF ROWLANDS CASTLE ROAD**

- 4.7 An outline planning application was submitted by Bloor Homes for the development of up to 85 dwellings for older people (aged 55 years and above), associated infrastructure, formal and informal open space and access from Rowlands Castle Road. Submitted in March 2019, the application is **Awaiting Decision**.
- 4.8 Application /006 relates to land located immediately to the west of the land subject to this reserved matters application.
- 4.9 The illustrative masterplan below shows the proposals, with our reserved matters site located to the east.



Illustrative Masterplan from outline application ref. 55562/006 – Bloor Homes

**55562/007 AND 55562/008 – HIGHWOOD - OUTLINE NORTH OF ROWLANDS  
CASTLE ROAD**

**4.10** In June 2019 two outline planning applications were submitted by Highwood for land north of Rowlands Castle Road.

**4.11** Application /007 against which this reserved matters application is being made, proposed:

*Outline application with all matters reserved aside from 'access' – Development of a care village comprising a 60-bed care home, a village care centre (VCC) incorporating up to 60 no. care-assisted living apartments and up to 60 no. C2 (age restricted) units comprising bungalows and apartments, with associated parking, landscaping and sustainable drainage*

**4.12** Application /008 proposed:

*Outline planning application with all matters reserved aside from 'access' – Development of a 60-bed care home and up to 69 no. C3 (age restricted) bungalows and apartments with associated parking, landscaping and sustainable drainage (with all matters reserved).*

**4.13** Both applications were **granted permission in February 2021** subject to conditions and Section 106 obligations.

**PLANNING STATEMENT  
RESERVED MATTERS - LAND EAST OF HORNDEAN**



Illustrative Masterplan from outline planning ref. 55562/007 – WYG

**55562/009 – HIGHWOOD – RESERVED MATTERS – PHASE 1 CARE HOME -  
NORTH OF ROWLANDS CASTLE ROAD**

- 4.14 Reserved matters were approved for Phase 1 of the development, covering the 60-bed care home, access link to Rowlands Castle Road, suds, landscaping and a sub-station in April 2021.



Site Layout Plan for Phase 1 Care Home

- 4.15 Subsequent applications for the discharge of conditions associated with permissions /007 and /009 were made to EHDC by Highwood in 2021.

## **5.0 THE PROPOSALS**

**5.1** The proposed development description for the application is as follows:

*‘Application for approval of reserved matters pursuant to outline permission 55562/007 (layout, scale, appearance and landscaping) for Phase 2, a care village comprising a village care centre (VCC) incorporating up to 60 no. care-assisted living apartments and up to 60 no. C2 (age restricted) units comprising bungalows and apartments, (C2 Use), communal facilities, energy centre, maintenance building and other ancillary structures, parking, drainage, landscaping, and other associated works’*

**5.2** The reserved matters scheme includes an additional 120 extra care units (Use Class C2) in the form of 102 apartments and 18 two and three bed bungalows as part of a Village Care Centre, with communal facilities and supporting works.



Proposed Site Layout Plan, Pozzoni

- 5.3 A full description of the proposals and the design considerations are provided in the accompanying Design and Access Statement, prepared by Pozzoni.
- 5.4 The VCC proposals include the following:
- Restaurant
  - Café / Bar Multi-functional meeting / craft / activity spaces
  - Wellbeing Centre comprising;
  - Swimming Pool and Steam Room
  - Gym/Fitness Studio
  - Treatment Room
  - Hairdressers
- 5.5 The proposals have been prepared to fully accord with the parameters set by the outline planning permission 55562/007, being sympathetic to the site and surrounding context, including any wider landscape and local key views and need to protect the nearby South Downs National Park.
- 5.6 Key constraints have been accommodated in scheme design, notably through locating development away from the high-pressure gas main present at the site, retaining important existing trees and respecting the setting of the nearby listed heritage assets at Hook Cottage.
- 5.7 Provision is made for vehicular, pedestrian and cycle access to the site from Rowlands Castle Road. An internal access road serves the VCC and bungalows/apartments, with provision for 130 car parking spaces. Spaces have been grouped together to form small parking courts close to the residents' properties throughout. The full rationale for parking provision is set out in the accompanying Highways Technical Note prepared by Paul Basham Associates. Secure cycle storage is provided for cycles and mobility scooters.
- 5.8 The landscape design is integral to the concept and success of the development. Similar to the previous schemes IV have completed, the landscaped spaces have been designed to be the 'streets' within the scheme that link all of the different elements

together

### **SUSTAINABLE BUILD**

- 5.9 In accordance with the outline planning permission the non-residential elements of the proposals seek to achieve a BREEAM excellent rating and will be a sustainable form of development. Indeed, IV are proposing a sustainable build that goes way beyond the requirements of the planning permission and current Building Regulations, to target Net Zero Operational Carbon standard.
- 5.10 Inspired Villages aim to achieve Net Zero Operational Carbon villages by 2030 and have already taken steps to achieve this which will be rolled out in villages that are commencing construction from 2021 onwards. Net Zero Operational Carbon is defined as *“When the amount of carbon emissions associated with the building’s operational energy on an annual basis is zero or negative. A net zero carbon building is highly energy efficient and powered from on-site and/or off-site renewable energy sources with any remaining carbon balance offset”*.
- 5.11 IV have designed the village to exceed current environmental standards using Low-to-Zero Carbon technologies in the following ways:
- New and emerging low carbon technologies such as ground source heat pumps, air source heat pumps and photovoltaics
  - High efficiency lighting and plant systems
  - Enhancing the design of the buildings
  - Providing better air tightness
- 5.12 Electrical vehicle (EV) charging infrastructure will be provided for all parking spaces. 10% of parking spaces will have EV charging points from day one of operation. IV will also operate an electric taxi service / minibus for short trip services (e.g. shopping or hospital visits) for residents.
- 5.13 An energy strategy accompanies the application, which incorporates measures that provide at least 10% of energy demand from decentralised and renewable or low carbon energy sources.

## PLANNING STATEMENT RESERVED MATTERS - LAND EAST OF HORNDEAN



- 5.14 The scheme is also designed to achieve a maximum water use of 110 litres per person per day.

## 6.0 STATEMENT OF COMMUNITY INVOLVEMENT

### PRE-APPLICATION ENGAGEMENT AND LIAISON

- 6.1 Highwood has a long and extended background of consultation and liaison with East Hants District and Horndean Parish Councils, consultees and other stakeholders in the local area that culminated in the outline planning permission and parameters for development relevant to this reserved matters application.
- 6.2 More recently, Inspired Villages and Highwood submitted draft proposals and a request for pre-application advice to EHDC in November 2021. Meetings and discussions have been held with officers at EHDC, Horndean Parish Council and various technical consultees. Letters have been issued to local residents giving the opportunity to ask questions and give feedback.
- 6.3 A public consultation website was created and has been active since January 2021 – <https://www.inspiredvillages.co.uk/village/horndean>. As of the end of January, this had attracted 104 unique viewers, who spent on average 6 minutes 55 seconds on the page as shown in the analytics summary table below:



Page	Pageviews	Unique Pageviews	Avg. Time on Page	Bounces	Bounce Rate	% Exit	Page Value
	125	104	00:06:55	88	77.27%	73.60%	£0.00
1 - village/horndean	125	104	00:06:55	88	77.27%	73.60%	£0.00

- 6.4 Five emails were received from local residents, which raised the following suggestions, issues and/or queries:
- Eligibility of local residents to access facilities at the new Village
  - Provision of adequate levels of car parking
  - Support for ‘net zero’ goals
  - Street lighting to respect South Downs ‘Dark Skies’ policy
  - Ensure age-restriction on properties
  - Request for additional tree-planting
  - Request for single-storey properties only in the development

- Mud on highway (our construction team has reacted to this issue and contacted the local resident directly)
- Will the existing pavement be extended along Rowlands Castle Road
- Concern over traffic

**6.5** Officers consulted several technical and statutory consultees and stakeholders as part of the process of providing useful and constructive pre-application feedback on draft proposals in the form of verbal advice given at meetings and in email responses.

**6.6** Several changes to the draft proposals have been made in response to comments made by the various stakeholders described above, that includes:

- Review of roof forms and building heights, including those on the site ‘frontage’ to Rowlands Castle Road and bungalows located towards the north of the site. Roof ridges and eaves levels have been lowered to minimise perception of scale and bulk of building blocks. Dormers provided to bungalows have been amended. The accompanying Design and Access Statement prepared by Pozzoni provides further details.
- Utilisation of flint within selected prominent building elevations to reflect the local vernacular. Additional detailing has been added to provide interest to elevations and the size and rhythm of fenestration has been reviewed to address concerns raised by officers. The accompanying Design and Access Statement prepared by Pozzoni provides further details.
- A review of car parking provision against adopted EHDC Parking Standards SPD was undertaken in line with comments suggesting that not enough parking was provided. This had to be balanced against comments from others that there may be too much parking and the development being at risk of being car dominated. See the accompanying Highways Note prepared by Paul Basham Associates for rationale and justification, which we feel strikes the right balance between working operationally, being sustainable and providing an attractive environment.
- Review of the village square as described in the accompanying Design and Access Statement prepared by Pozzoni.
- Review of the landscape and planting strategy to visually soften areas of car

parking and hardstanding across the development and to review tree planting. See the accompanying Landscape Design Statement prepared by Fabrik.

- Pedestrian permeability has been reviewed and improved with additional footpath links to the west of site. Due to security and management reasons, appropriate pedestrian access between the phase 1 care home and phase 2 care village remains as approved under phase 1 reserved matters, i.e. footways along the access to the care home. In accordance with the provisions made in the Outline permission scheme, a footpath will be provided along Rowlands Castle Road as approved (i.e. this is unaffected by this reserved matters submission).
- The lighting strategy has been updated to ensure protection of dark skies within the context of the South Downs Dark Night Sky Reserve and ecological requirements highlighted at outline planning stage. See the External Lighting Assessment prepared by Hydrock that accompanies the application.

## **7.0 CONSIDERATION OF PROPOSALS**

**7.1** Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise.

**7.2** The development plan covering the area comprises:

- East Hampshire District Local Plan: Joint Core Strategy (Part 1), 2014
- East Hampshire District Local Plan: Housing and Employment Allocations (Part 2), 2016
- Hampshire Minerals and Waste Plan, 2013

**7.3** Other relevant material planning policy considerations include:

- The National Planning Policy Framework (NPPF), 2021
- The National Planning Practice Guidance (NPPG)
- Emerging East Hants District Local Plan 2017-2036

**7.4** The main overriding material planning consideration in this case is the presence of the outline planning permission 55562/007.

### **LOCAL PLAN PART 1 – JOINT CORE STRATEGY**

**7.5** The East Hampshire District Council Local Plan: Joint Core Strategy was formally adopted in June 2014 and provides the overarching planning policy framework for East Hampshire up to the period of 2028. The Core Strategy sets out the spatial strategy and high-level policies in respect of economic development, housing, the natural and built environment and transport. The policies of relevance to this reserved matters application are explained as follows.

**7.6 CP1 – Presumption in Favour of Sustainable Development.** East Hampshire District Council and National Park Authority will regard planning applications which accord with the policies set out in the Core Strategy as sustainable development and therefore grant approval, unless material considerations state otherwise. They will also work proactively with applicants to find solutions to approve proposals that

improve economic, social and environmental conditions in the area where possible. The Council and National Park Authority will grant permission for applications in cases whereby there are no relevant policies to the application or where relevant policies are out of date at the time of making the decision, unless material considerations indicate otherwise. The Council will consider whether or not any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits when assessed against the NPPF or if there are specific policies within the NPPF that indicate the development should be restricted.

- 7.7 The reserved matters proposals are consistent with the delivery of sustainable development and are in accordance with a development plan and outline planning permission and should be granted permission without delay.
- 7.8 **CP11 – Housing Tenure, Type and Mix.** The Council seeks to address housing requirements through provision of a range of dwelling tenures, types and sizes to meet housing needs in the area. Additionally, the Council seeks to provide housing to meet community requirements, such as extra care housing and other housing for older people.
- 7.9 The proposals will deliver much needed specialised care accommodation for older people to the benefit of the community.
- 7.10 **CP12 – Housing and Extra Care Provision for the Elderly.** The Council supports the development of housing and extra care provision for older people through the allocation of sufficient sites and/or the granting of planning permission. As defined by the Council, housing and extra care accommodation includes Continuing Care Retirement Communities and Retirement Villages. Emphasis is put on the necessity to address the needs of the ageing population and provide development in locations that are appropriate.
- 7.11 The proposals fully accord with Policy CP12.
- 7.12 **CP20 – Landscape.** The Council seeks to conserve and enhance the natural environment of the District, with new development required to adhere to the following:

- a) Conserve and enhance the natural beauty, tranquillity, wildlife and cultural heritage of the South Downs National Park and its setting.
- b) Protect and enhance local distinctiveness, sense of place and tranquillity through the application of the principles set out in the district's Landscape Character Assessment.
- c) Protect and enhance settlements in the wider landscape, including land at the urban edge and green corridors which extend into settlements
- d) Protect and enhance natural and historic features which contribute to the distinctive character of the district's landscape, including trees, woodlands, hedgerows, soils, rivers, river corridors, ditches, ponds, ancient sunken lands, ancient tracks, rural buildings and open areas.
- e) Appropriate new planting to enhance the landscape setting of new development.
- f) Maintain, manage and enhance the green infrastructure networks in line with Policy CP28 Green Infrastructure.

**7.13** For reasons as described in the accompanying Design and Access Statement and other supporting plans and reports (such as the Landscape Design Statement, Environmental Mitigation and Management Plan, Landscape Maintenance & Management Specification, and Arboricultural Method Statement prepared by Fabrik, Tetra Tech, Hydrock and James Fuller Arboriculture), the proposals fully accord with Policy CP20.

**7.14** The proposed buildings, supplemented by a high-quality landscape scheme, will provide for a development that will sit sympathetically within the surrounding context, which includes the South Downs National Park to the east and listed building to the north.

- 7.15 CP21 – Biodiversity.** The Council will seek to conserve, enhance and protect the biodiversity found in the East Hampshire District as well as its wider surroundings. These may be designated or undesignated and include those of international, national and local significance.
- 7.16** Natural and manmade assets associated with biodiversity and wildlife networks should be protected and enhanced regardless of designated status, including important trees, rivers, river corridors and hedgerows. Policy CP21 encourages the provision of wildlife enhancements in new developments in order to achieve a net gain in biodiversity and to ensure any adverse impacts are avoided where possible.
- 7.17** The accompanying Environmental Mitigation and Management Plan prepared by Tetra Tech demonstrates that the proposals fully accord with Policy CP21.
- 7.18 CP24 – Sustainable Construction.** This policy is somewhat outdated in that it outlines that new residential development from 2016 onwards must be constructed using sustainable design standards, with the minimum level of 5\* of the Code for Sustainable Homes. Major developments must maximise on-site renewable or low carbon energy production and resource efficiency.
- 7.19** Nevertheless, the proposals seek to achieve BREEAM Excellent and as set out in the accompanying BREEAM Pre-assessment and Energy and Sustainability Statement prepared by SRE, the development accords with the spirit of the aspirations set out by Policy CP24.
- 7.20 CP25 – Flood Risk.** The site is located within Flood Zone, which is low risk. The application is supported by technical information on proposed drainage and SUDS and meet the policy requirement that drainage systems must be designed to take account of events that exceed the normal design standard. The scheme is consistent and compatible with site-wide strategies approved at outline stage and subsequent details discharged under outline permission conditions and phase 1 reserved matters.
- 7.21 CP26 – Water Resources/Water Quality.** The Council requires new development to protect the quality and quantity of water. Development will be permitted if it protects and enhances the quality and quantity of groundwater, surface water features and

controls aquatic pollution; has an adequate means of water supply, sufficient foul and surface water drainage and adequate sewage treatment capacity; and demand management technologies are incorporated into the design to meet level 5\* of the Code for Sustainable Homes as defined in Policy CP24.

- 7.22** This policy is out of date. Nevertheless, the proposals, supported by information to be submitted in discharge of the outline permission will protect water resources and water quality. Water efficiency measures are to be provided under the target BREEAM 'Excellent' for the village centre.
- 7.23** **CP27 – Pollution.** The Council seeks to prevent development that causes adverse impacts to the health and safety of communities and their environments. Development including a lighting scheme will not be permitted unless the minimum amount of lighting necessary to achieve its purpose is proposed, as defined by the policy. In determining the application, the Council will take into consideration the aesthetic effect of the light produced and its impacts on local residents, vehicle users, pedestrians and the visibility and appreciation of the night sky. Development that is likely to impact an internationally designated site will be required to undertake the appropriate assessment under the Habitat Regulations.
- 7.24** The proposals are accompanied by External Lighting and Ecological assessments prepared by Hydrock and Tetra Tech, which demonstrate the proposals accord with Policy CP27.
- 7.25** **CP29 – Design.** The Council emphasises that development must be designed to an exemplary standard and highly appealing in visual appearance. Development will be required to respect the character, identity and context of the towns, villages and countryside within the District. The design and layout of development is required to contribute towards local distinctiveness, sense of place, accessibility, scale, height, massing and density, relationship to adjoining buildings, spaces around buildings and landscape features. Additionally, it must make a positive contribution to the overall appearance of the area through use of high-quality materials or appropriate scale, finish, colour and weathering ability as well as integrating car parking that will contribute to a high-quality environment. Development must also be designed to reduce opportunities for crime and anti-social behaviour without compromising the

high quality of the overall appearance.

- 7.26** The accompanying Design and Access Statement and application drawings demonstrate that the proposals will be of a high quality, sympathetic to and appropriate to the site and surroundings and in accordance with the parameters set by the outline permission. The proposals fully accord with Policy CP29.
- 7.27** **CP31 – Transport.** The Council encourages maximising the use of sustainable transport methods such as walking, cycling, and public and community transport by means of the design of new development. Several criteria are set out in the policy that development will be required to adhere to. Further to this, new development should be located appropriately to reduce the need to travel whilst those expected to generate large volumes of additional vehicular movements will be encouraged to be located near existing centres and supportive infrastructure.
- 7.28** The principle of development was established by the outline permission. A Technical Note on highways and other detailed access matters relevant to this application has been prepared by Paul Basham Associates and accompanies the application. Along with submitted plans, this demonstrates that the proposals accord with Policy CP31.

## **LOCAL PLAN PART 2 – ALLOCATIONS**

- 7.29** The East Hampshire District Local Plan Part 2: Housing and Employment Allocations identifies sites that will meet the housing and employment targets set out in policies CP3 and CP10 of the Joint Core Strategy and set out the development guidance for these sites.
- 7.30** **Policy HN1 Land East of Horndean** – This policy allocates a 62ha area of land to the east of Horndean proposed for mixed use, including:
- Circa 700 dwellings
  - Care Village including independent living units and extra care provision for older people)
  - Land for circa 2ha industrial (B2) and business use (B1)
  - A new primary school and land for future expansion

**7.31** The Policy states the site will be developed in accordance with the following site-specific criteria:

- provide accommodation for older people, including extra care
- ensure any significant negative impact is mitigated on the local and strategic road network
- provide an on-site movement layout suitable for all potential users, linked to existing external routes including the Public Rights of Way Network, Horndean Village, Hazleton Common and the South Downs National Park;
- provide landscaping and screening to minimise the impact of development on the setting of the South Downs National Park and on the setting of the Grade II Listed Buildings at Pyle Farm;
- provide new green infrastructure to connect with the wider network, and to improve the habitat connectivity between the adjoining SINCS
- be supported by a Biodiversity Enhancement and Mitigation Scheme and include measures to protect key species and habitats on site;
- not result in contamination of the aquifer or groundwater (including turbidity);
- provide noise mitigation measures including noise bunds and barriers, to reduce traffic noise from Havant Road and the A3(M);
- ensure risks from land contamination are minimised, through remediation works; and
- manage important archaeological remains within the site.

**7.32** The submitted application drawings and reports which will be supplemented by detailed information to be provided in discharge of outline permission conditions demonstrate that the proposals accord with Policy HN1 and the parameters set by the outline planning permission.

### **DRAFT LOCAL PLAN 2017 – 2036**

**7.33** East Hampshire District Council are currently in the first stages of preparing a new local plan. A six-week consultation on the Draft (Regulation 18) Local Plan was carried out between 5 February and 19 March 2019. The emerging plan contains spatial, site

specific and development management policies to guide development in the District up until 2036.

- 7.34** Whilst the policies can only be afforded minimal weight at this time, not having been subject to Regulation 19 consultation or Examination, of relevance to this proposal is Draft Policy SA33 – Site SA33 – Land East of Horndean, Rowlands Castle.
- 7.35** Policy SA33 allocates the 62ha site on land to the east of Horndean for a mixed-use development to include:
- Circa 850 dwellings
  - A Care Village including independent living units (around 100 units) and extra care provision for older people (60-bed care home)
  - Land for circa 2ha industrial (B2) and business use (B1)
  - A new primary school and land for its future expansion
- 7.36** Supporting text acknowledges that outline planning permission has been granted and the policy exists to guide the determination of any subsequent planning application. It also notes that since the original allocation in the East Hampshire District Local Plan Part 2: Housing and Employment Allocations, the Council is aware that the site may accommodate more housing (about 850 units).
- 7.37** Policy S8: Specialist housing is also relevant in that it demonstrates that the Council recognise the increasing need to provide specialist accommodation for the ageing population.

### **HAMPSHIRE MINERALS AND WASTE LOCAL PLAN (2013)**

- 7.38** **Policy 15 seeks to safeguard minerals resources.** In November 2014, a Minerals Assessment was carried out by WYG to support outline planning application reference 55562/001. This assessment covered the entire Local Plan Allocation HN1 and identified the site as being outside of any Mineral Safeguarding Areas (MSAs). The previous assessment concluded that although land to the south of the site contained considerable clay resource, as there was no commercial interest in the extraction of the clay, prior extraction was not feasible. The current application site, being smaller

than that previously granted outline consent, does not fall within the MSA and consequently, does not conflict with the provisions of the adopted Minerals and Waste Plan.

## **NATIONAL PLANNING POLICY AND GUIDANCE**

- 7.39** The proposals fully accord with the National Planning Policy Framework (NPPF) and accompanying National Planning Practice Guidance (NPPG), which are material considerations when considering planning applications and set out the Government’s planning guidance for England and states how they are expected to be applied in the pursuit of sustainable development.
- 7.40** The objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.
- 7.41** Paragraph 8 confirms that there are three overarching objectives for the planning system, which are interdependent and need to be pursued in mutually supportive ways in order to achieve sustainable development:
- a) an economic objective (to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;);
  - b) a social objective (to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and); and
  - c) an environmental objective (to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and

pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.)

- 7.42** Paragraph 9 confirms that the overarching objectives should be delivered through the preparation and implementation of plans and the application of policies, though they are not criteria against which every decision can or should be judged – development should be guided towards sustainable solutions but consider local circumstances to reflect the character, needs and opportunities in each area.
- 7.43** Paragraph 11 of the NPPF emphasises that plan-making and decision-making should apply a presumption in favour of sustainable development. It states that: “For decision-taking this means: approving development proposals that accord with the development plan without delay.
- 7.44** Paragraph 38 states that when determining applications, Local Planning Authorities should approach decisions in a positive and creative way. This paragraph further states that Planning Authorities should work proactively with applicants to ensure developments will improve the economic, social and environmental conditions, whilst seeking to approve applications for sustainable development where possible.
- 7.45** Section 5 of the NPPF sets out measures to deliver a sufficient supply of homes and notes the need to assess the needs of different groups in the community, including older people (Paragraph 62).
- 7.46** Section 15 of the NPPF provides guidance on the conservation and enhancement of the natural environment by protecting and enhancing valued landscapes, including National Parks and AONBs, sites of biodiversity or geological value, ecological networks, and trees/woodland. Decisions should contribute to minimising impacts on biodiversity/ecology and opportunities to incorporate improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity.
- 7.47** National Planning Practice Guidance outlines at para ID: 63- 001-20190626 that,  
  
*“the need to provide housing for older people is critical. People are living longer lives and*

*the proportion of older people in the population is increasing. In mid-2016 there were 1.6 million people aged 85 and over; by mid-2041 this is projected to double to 3.2 million. Offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems. Therefore, an understanding of how the ageing population affects housing needs is something to be considered from the early stages of plan-making through to decision-taking.”*

- 7.48** This is the only housing typology considered in the PPG to be of such significance, and should be a significant material consideration in favour of the proposals.

#### **THE CRITICAL NEED FOR SPECIALIST OLDER PERSONS HOUSING**

- 7.49** A Needs Assessment has been carried out by Barton Willmore, reviewing the future housing need for specialist older persons housing based on the demographics of the district, existing and planned supply, and tenure. This assessment identifies an ageing population and one with an age profile above the national average and where home ownership amongst older people is also significantly above the national average. The result of this, is that even accounting for existing and consented future demand, the needs of home-owning older people is not and will not be met.
- 7.50** National policy and guidance are clear in requiring local authorities to plan to meet the needs of older people and importantly, the NPPG confirms that “*where there is an identified unmet need for specialist housing, local authorities should take a positive approach to schemes that propose to address this need*” (Paragraph: 016 Reference ID: 63-016-20190626). The PPG also confirms that plan makers should evaluate the tenure, types and size of supply and current stock to assess whether future needs will be met, recognising that, “*The need to provide housing for older people is critical as the proportion of older people in the population is increasing*”.
- 7.51** As evidenced in the enclosed Need Report, in East Hampshire District, there is a **projected rise of around 42% for those people aged 65 years and over within the population of East Hampshire District from 2020 to the year 2040**. To put this into perspective the growth across England over the same period is projected to be 8%.

- 7.52 Levels of owner-occupation among older people in the district are also above national averages at 85% for those between 65 and 74 years of age. This suggests that the current level of provision of Extra Care Housing does not reflect the need for specialist accommodation in all tenures but particularly for that substantive majority of older people who will wish to maintain their tenure of choice when moving to a setting providing the care and support services that meet their needs.
- 7.53 The current supply of Market Extra Care Housing in East Hampshire District is approximately 50% of the current need for this type of accommodation. **By 2040, current provision will be just 36% of anticipated demand for this tenure.** The current provision of Extra Care Housing in the Borough does not reflect the need for such accommodation in all tenures, but particularly for those who will wish to maintain their tenure of choice as homeowners when moving to a setting providing the care and support services that meet their needs.
- 7.54 The submitted information identifies a clear need within East Hampshire District for the provision of housing for older people and the proposal seeks to address that need.

	<b>Market</b>	<b>Affordable</b>
Population age 75+ in 2020	14,192	
Target Extra Care Provision Rate (per thousand age 75+)	30	15
<b>Current Extra Care Requirement (units)</b>	<b>426</b>	<b>213</b>
Current Extra Care Supply (units of accommodation)	240	0
<b>Current shortfall (as at mid year 2020)</b>	<b>186</b>	<b>213</b>
Population Change, 75+, 2020 to 2036	7,863	
<b>Additional Future Requirement, 2020 to 2036 (units)</b>	<b>236</b>	<b>118</b>
<b>Current Shortfall and Future Requirement to 2036</b>	<b>422</b>	<b>331</b>

Table 4.1 of Barton Willmore Needs Assessment Report – demonstrating need for Extra Care housing in East Hampshire

## **8.0 CONCLUSION**

**8.1** This application seeks approval for:

*‘Application for approval of reserved matters pursuant to outline permission 55562/007 (layout, scale, appearance and landscaping) for Phase 2, a care village comprising a village care centre (VCC) incorporating up to 60 no. care-assisted living apartments and up to 60 no. C2 (age restricted) units comprising bungalows and apartments, (C2 Use), communal facilities, energy centre, maintenance building and other ancillary structures, parking, drainage, landscaping, and other associated works’*

**8.2** The application is supported by a suite of drawings, reports and assessments which together demonstrate how the proposals will be accommodated on the site in a manner that accords with local and national planning policy and other technical requirements and guidance, including the parameters set by the outline planning permission. The accompanying Needs statement demonstrates the high demand for specialist accommodation for older people in the local area.

**8.3** The plans and DAS demonstrate that a high-quality development is proposed that respects the attractive setting, the character and appearance of the surrounding area and is one which will create its own sense of identity.

**8.4** The development will deliver a range of benefits, including:

- Economic:

The development will benefit the local economy through the direct provision of jobs during the construction period and staff working in the new care home. There will be increased spend resulting from the development which will benefit the local economy.

- Social:

The development will provide much needed older persons specialist care accommodation in a sustainable location as demonstrated in the Needs statement.

- Environmental:

The proposals include measures for the protection of important ecological features including the mature tree belt which is located within the site and the provision of sustainable drainage features to serve the development.

- 8.5** In conclusion, the scheme provides high quality, sustainable development which fully accords with the parameters set by the outline planning permission, local and national planning policy and guidance and will provide much needed specialist care accommodation.



16 January 2023

Reference  
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Cc  
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Page  
1 of 4

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

Dear Sir/ Madam

**Subject: Local Plan Issues and Priorities Regulation 18 consultation**

I write on behalf of my client, Bloombridge LLP in regard to the consultation above, in respect of its interest in Land off B3004 (Forge Road), Kingsley Common, Bordon, GU35 9LU.

**Employment**

We acknowledge that this consultation is a second round and seeks to focus on matters other than employment. We take the opportunity to make some observations for officers in light of the second volume of the 2022 housing and employment development needs assessment (HEDNA 22), prepared by Icenl, and in respect of draft policies set out in the 2019 consultation.

Land at Kingsley Common is identified in the annex attached to this letter. The land extends to 5.78 acres (2.34 ha) and has good transport links via the B3004 to the M3 and A3 roads and the wider highways network.

We will duly issue material to the Land Availability Assessment (LAA) for consideration of the designation of this site as a strategic employment site or as a site allocation for employment use. Our key point is that a range of employment sites is the best approach for East Hampshire as this responds to an increasingly flexible employment market, with far more businesses (notably SMEs) locating closer to where their employees live. And the relevance is that most businesses, and the fastest growing businesses, are SMEs; hence the need in soundness terms for the emerging Local Plan to plan for these important needs.

**Test of soundness and legal compliance**

We question whether certain draft policies in the emerging Local Plan as published in the 2019 consultation meet the test of soundness and legal compliance and whether they have been fully tested for sustainability. In particular:

- Policy S1: Quanta and location of development Employment;
- Policy S13: Planning for economic development.

**Draft Policy S1: Quanta and location of development**

The draft policy wording is set out below:

*Employment*

16 January 2023

Reference

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Page

2 of 4

S1.10 New employment growth will be directed to the main settlements within the Area and the strategic and locally significant employment sites.

S1.11 The Local Planning Authority will deliver a minimum of 50ha of employment land between 2017 and 2036. This will be achieved by:

1. completions (1.85 ha)
2. existing permissions (15.84 ha)
3. the allocation of 32.6 ha (see sites SA9, SA17, SA21, SA22 and SA24)
4. resisting the loss of employment floorspace on strategic and locally significant employment sites.

S1.12 Additional employment floorspace can be provided through the allocation of sites in Neighbourhood Plans.

#### Draft Policy S13: Planning for economic development

The draft policy wording is set out below:

##### *Office and Research & Development:*

S13.3 Proposals for new office and research & development (B1a and B1b) floorspace will be directed sequentially to the town centres of Alton and Whitehill & Bordon, and the strategic employment sites. Only if sites cannot be found in these locations should edge of centre sites be considered.

S13.4 The sequential approach does not apply to proposed floorspace included in the site allocations in the Local Plan.

##### *Industrial, warehousing and storage:*

S13.5 Proposals for new industrial, warehousing and storage (B1c, B2 and B8) floorspace will be directed to the Strategic Employment Sites and any sites where this use class of floorspace is included in the site allocations in the Local Plan.

##### *All B use class development:*

S13.6 Proposals for the provision for small business units (less than 50 sqm), suitable for start-ups and SME will be encouraged.

The HEDNA 2022 indicates that employment growth in the area is likely to remain strong, where the supply of stock is relatively limited and demand levels increasing as has the appetite from industrial employment and related investors (paragraph 4.23). The assessment of how much industrial land is required during the plan period 2021-38 is noted to be most accurately assessed on the basis of completions. Paragraph 12.31 describes how much additional land in total, table 12.8 confirms for industrial that between 10.1 ha and 13.1 ha of land is required. While the assessment shows this is broadly in line with current Local Plan commitments and allocations, the HEDNA 22 states in paragraph 12.53 it considers “that there may be qualitative case to seek to broaden the employment offer in order to maintain a supply of deliverable employment sites across the main towns in the District, including Bordon, Alton and Petersfield”. We agree.

#### **Changes sought**

We suggest fulfilling this is met by taking an approach in draft policies S1 and S13 to include sites that may have good planning reasons for coming forward for employment use, but

16 January 2023

Reference

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Page

3 of 4

which are not allocated sites or in a town centre. In order to be found sustainable and to meet the tests of soundness and legal compliance, we suggest these policies should, therefore, seek to accommodate a windfall employment development provision, where any windfall is evidence based and considered on its merits and in the context of deliverability constraints that identified at allocated and strategic sites. The soundness point is that this will provide the all important flexibility to respond to employment opportunities as, when and where they arise.

In addition:

1. In accordance with the criteria in Policy S13, which refer specifically to excluding the sequential approach from 'site allocations in the Local Plan', we would like to suggest the 2.34 hectares at Kingsley Common as an employment site allocation to add to the critical mass of employment space in the vicinity.
2. Following on from Point 2, we justify this proposed site allocation in strategic terms by encouraging employment land flexibility and, specifically, by responding to the positive intent of Policy 13.6, which seeks to encourage the provision of small business units.

We have sought to identify a possible concern with the soundness of the emerging Local Plan but, usefully, we have also suggested a way of resolving this concern – a site allocation. In support of this proposal, we note that Bloombridge LLP is a highly successful developer of employment space, with projects including Silverstone Circuit, McLaren, Oxford Technology Park and the Bicester Gateway Innovation Community. We therefore consider the 2.34 hectares at Kingsley Common as suitable and deliverable, serving an important local employment need.

We look forward to hearing from you.

Yours sincerely

[REDACTED]

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16 January 2023

Annex – site plan

Reference



Cc



Page  
4 of 4



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

**Date:** 16 January 2023

**Our ref:** [REDACTED]

Dear Sir/Madam

## **Draft East Hampshire Local Plan - Representation on behalf of Berkeley Homes (Southern) Ltd**

On behalf of Berkeley Homes Southern Ltd (Berkeley Homes), we provide comments on the draft Regulation 18 (Part 1) Local Plan's key issues and priorities consultation, which runs until 16<sup>th</sup> January 2023. At this stage, as requested, we are not making a site-specific case as we understand that the opportunity to do so will come forward in the next version of the Local Plan (Regulation 18 – Part 2). However, we would draw your attention to the fact that Berkeley Homes own land to the Rear of 41 to 43A Blackberry Lane at Four Marks (see the plan appended to this letter) and would welcome the opportunity to discuss this with you, at the appropriate time, with regard to a potential housing allocation. A call for sites submission will be made shortly for consideration within the next iteration of the Land Availability Assessment (LAA).

### **Overview**

Overall, Berkeley Homes consider that in the current housing crises, supporting the delivery of much needed new homes must be a top priority for the Local Plan, respecting that such development should not harm sensitive environments and, in the design of any new development, should have regard to the climate emergency.

In the preparation of the Local Plan, it is imperative that the local planning authority liaise closely with infrastructure providers to ensure that the necessary infrastructure is funded and in place at the right time to support the growth needed, and also with housebuilders to ensure that allocated sites can be delivered in line with the trajectory.

### **The Vision**

Berkeley Homes support the Vision, but consider that it is imperative that in order to meet this, clear strategic objectives will be needed to support any policies and allocations in future iterations of the Local Plan. In line with the comments above on the overview, Berkeley

Homes would support the theme of “A Front Door for Everyone” that was set out in a previous draft version, as this is considered to be a necessary and achievable objective, in the context of providing sustainable levels of growth across the planning area.

## **Housing**

Berkeley Homes would agree that, 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. In light of the above, it is of great importance that the assessed housing needs for the District are met. These cannot be ignored as the social and economic impacts of not meeting the District-wide housing need are too great. Given the specific planning policy constraints affecting the South Downs National Park (SDNP), it will therefore be necessary to make provision for any shortfall in the wider needs, that cannot be met within the SDNP, within other areas of the District.

Berkeley Homes are in support of meeting the identified local housing needs and seeking to direct development to the most sustainable and accessible locations and consider that this is achievable within the District through the delivery/allocation of both large and small sites and supporting housing development at higher densities than may prevail at the current time.

As set out above, Berkeley Homes consider that the Council can and should meet the assessed housing needs within the District/Local Plan area and should not be looking to neighbouring authorities to meet any of that need.

## **Development Options**

The Regulation 18 Part 1 consultation is at a high-level stage presenting options for strategic growth. Three of the four growth options presented rightly include some form of development in Four Marks, as one of the District’s higher tier settlements. In principle, Berkeley Homes would support both Option 1 and Option 2.

Option 1 would involve the development of new homes in a wider range of settlements and correctly recognises Four Marks as a Tier 2 settlement, reflective of the level of services and infrastructure available. However, Berkeley Homes consider that the spatial strategy should focus more on the larger settlements – such as Four Marks – for the greater part of the growth required, as this would be a more sustainable approach with greater support for existing services and a reduced need to travel by car to reach local facilities, schools, and employment opportunities.

Therefore, Berkeley Homes also support Option 2. While diagrammatically Four Marks appears as a Tier 3 settlement in error, this Option would look to concentrate development of new homes in and around the ten largest settlements in the planning area. This is on the basis that, in determining suitable locations for greater growth, it will be important to consider the findings of the Settlement Hierarchy Background Paper (2022) for the draft Local Plan consultation and the Interim Sustainability Appraisal (SA) Report on Strategic Site Options (February 2021).

In this regard, it is noted that the Settlement Hierarchy responds to the climate emergency and uses a methodology that emphasises the need to lower greenhouse gas emissions associated with transport. It explores in more detail the concept of accessibility as part of determining a revised settlement

hierarchy. Berkeley Homes would therefore agree with paragraph 1.3 of this document, which notes that:

*“The classification of towns, villages and rural settlements is important in planning terms. It is a tried and tested method for supporting the implementation of local plan policies and in particular for defining a development strategy. Settlements that are in a higher tier of the hierarchy will often be more sustainable locations for new development, because new residents would be able to access a greater range of services and facilities more easily, without the need to travel large distances by car”.*

In this analysis, we note that the top seven ranked settlements that stand clear of the others are Alton, Liphook, Whitehill and Borden, Horndean, Grayshott, Four Marks and Clanfield and that these are, rightly, identified as Tier 1 and 2 settlements. On sustainability grounds, these should, therefore, be the main focus for new development.

Further, having regard to wider considerations, the Interim SA on Strategic Site Options concluded that the three areas of land at Four Marks and Southeast Liphook:

*“... are notable as the only options at which significant negative effects are not anticipated under any theme. Exploring these four options more closely, it is apparent that Options 2 and 4 appear marginally stronger overall, on the basis that they share the greater number of strongest and second-strongest performances of the four”.*

In the light of the above, Berkeley Homes consider that there is limited rationale for Option 3 which is unclear in its distribution of development, and see no need to pursue Option 4, as an isolated new settlement would not deliver the new homes needed in the shorter to medium term.

## **Types of Housing**

The types of housing should not be made specific in terms of either numbers, types, or location. These are matters that should be encouraged, but remain flexible to enable providers to adapt to the market and to respond to demand in the right places for the particular use. Berkeley Homes recognise the need for some homes to be adaptable on larger sites.

Berkeley Homes would not support a policy that would apply to each and every site regarding the proposed size mix of new homes. While an indicative/guideline mix may be helpful for the District as a whole, there must remain flexibility in delivery of a mix on a site-by-site basis, having regard to their individual characteristics such as size, location, etc.

## **Affordable Housing**

It is appropriate to set an aspiration for the amount of affordable housing that the Council is planning to deliver across the District/Planning area. However, this must be subject to viability, on a site-by-site basis, if new homes and affordable homes are to be delivered.

## **41-43a Blackberry Lane**

Berkeley's site (as shown in the appended plan) lies to the south-eastern side of Blackberry Lane, close to the village centre in a sustainable location. The site comprises 0.74 hectares, and sits directly behind 41 and 43A with a central access track located between the properties. The site is brownfield, occupied

by a collection of dilapidated buildings, and unconstrained by planning designations. Berkeley consider the site to be deliverable in the short term, and it therefore provides East Hampshire District Council with a good opportunity to contribute to their housing needs with minimal impact.

**Summary**

Berkeley aspires to work constructively with the Council and the local community to support growth in the District and create a shared vision for development to meet needs, and we hope that the comments made above will be helpful in doing so.

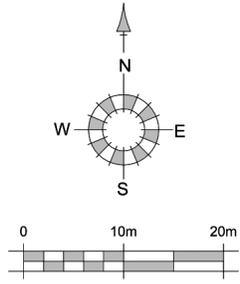
The settlement of Four Marks has strong sustainability credentials and there is potential for Berkeley's site to the rear of 41-43a Blackberry Lane to come forward in future iterations of the Local Plan. Should you have any queries, please do not hesitate to contact me [REDACTED]

Yours sincerely

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REF.	DATE	REVISION
DEVELOPMENT LAND AT WOODSIDE, BLACKBERRY LANE, FOUR MARKS, HAMPSHIRE.		
DRAWING TITLE LAND OWNERSHIP PLAN		
<b>Berkeley</b> Designed for life Berkeley Homes (Southern) Limited Berkeley House, Bay Tree Avenue Leatherhead Surrey, KT22 7UE Tel: (01372) 370400		
DRAWN	CHECKED	
DATE	SCALE	
NOVEMBER 2013	1:500@A2	
DWG. No.		REV.



**LRM**  
PLANNING  
LIMITED

# **EAST HAMPSHIRE LOCAL PLAN 2021-2040 REGULATION 18 CONSULTATION**

Response prepared on behalf of Hallam Land Management Limited

January 2023



## Report Control

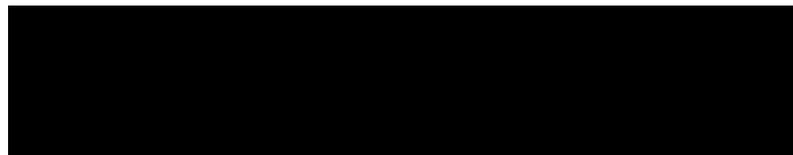
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## Contents

1	Introduction .....	3
2	Issues and Priorities .....	5
3	The Climate Emergency .....	6
	Net zero greenhouse gas emissions .....	6
	The energy hierarchy .....	6
	The location of new development .....	6
4	Population and Housing.....	7
5	Types of Housing Needs.....	9
	Older Persons Housing.....	9
	Accessible and Adaptable Housing.....	9
	Home Sizes and Mix .....	9
6	Environment .....	10
7	Development Strategy and Spatial Distribution .....	11
8	Summary.....	13



# 1 Introduction

- 1.1 This response to the East Hampshire Local Plan 2021-2040 has been prepared on behalf of Hallam Land Management Limited ('Hallam'). Hallam has previously submitted representations to earlier consultation documents in 2019. Those representations concerned amongst other things spatial strategy, the District's development needs, the proposed allocations at Alton (SA19) and Four Marks (SA25).
- 1.2 This present consultation – a Regulation 18 Plan – takes a step back from the earlier Regulation 19 Plan and considers again *Issues and Priorities*. This is described as a *reset* with further early engagement on matters that are important to the District.
- 1.3 By the present time, both the Local Plan - Joint Core Strategy adopted in 2014 and the Housing and Employment Allocations adopted in 2016, are older than five years and neither can be considered to be up to date Local Plans. Moreover, certain of the saved policies originate from 2006.
- 1.4 The effect of the *reset*, and the assumption that the Local Plan will now be adopted in 2025, is that the current development plan will be some ten years old by that time. For the planning system to be genuinely plan-led, and provide a framework for meeting housing needs and other economic, social and environmental priorities, there is a pressing need to progress this Local Plan.
- 1.5 One of the principal issues that this consultation is concerned with is the amount of new housing that should be provided in the District. As is recognised in the consultation document, East Hampshire is extremely unaffordable. The Council's Corporate Strategy records that "East Hampshire's ratio ranks 2nd in Hampshire, meaning it is deemed in the top-end of unaffordability". Similarly, in the Council's Place Making Strategy, addressing housing affordability, building more homes and supporting infrastructure are identified as important objectives.
- 1.6 In this context, there can be no question that the Local Plan should be providing as much new housing as possible. It must set out a deliverable strategy, focusing, in the first instance on new development at established and sustainable settlements, where new development can be assimilated with existing communities. Similarly, policies in the Local Plan should not result in obligations that cause new development to be unviable as this will prevent new development necessary to meet social and economic objectives from being delivered in a timely manner.
- 1.7 We are mindful that the Government has recently published a consultation concerning potential amendments to the National Planning Policy Framework. Paragraph 1 of that consultation document indicates that the government is committed to "building more homes" whilst Paragraph 6 explains that the government "remains committed to delivering 300,000 homes a year by the mid-2020s".
- 1.8 In the proposed revisions, paragraph 1 makes clear that the NPPF provides "*a framework within which locally-prepared plans can provide for sufficient housing and other development in a sustainable manner.*" At paragraph 60 the overall aim of a Local Plan is identified as meet[ing] as much housing need as possible with an appropriate mix of housing types to meet the needs of communities.



1.9 It is clear therefore that the potential amendments to the NPPF firmly intend that Local Plans, including this one, continue to provide a sufficient supply of housing land to meet identified needs.

1.10 Our representations, framed by the above considerations, respond to the various consultation themes. They are structured as follows:

Section 2 concerns the Issues and Priorities

Section 3 concerns the Climate Emergency

Section 4 concerns Population and Housing

Section 5 concerns the Environment

Section 7 concerns Development Strategy and Spatial Distribution



## 2 Issues and Priorities

- 2.1 This Section of the consultation document identifies five key issues, namely Housing and Population, Type of Housing Needs, Environment, Infrastructure and Climate Emergency. These are common themes to many Local Plans.
- 2.2 Unsurprisingly this list mirrors Paragraph 20 of the NPPF which indicates the areas which strategic policies in a Local Plan should cover. These matters are similarly core or central elements of sustainable development as set out in Paragraph 8 of the NPPF.
- 2.3 As with all planning matters, a balanced view needs to be taken of these various issues and priorities. One issue cannot be afforded more weight or greater importance than another. Consequently, it would be wrong to rank these issues to determine an importance or a priority list and for the Local Plan to be geared towards that prioritisation.
- 2.4 Rather, the Local Plan must comprise integrated and complementary policies, compiled using the framework provided by sustainability objectives and appraisal. The Local Plan's overarching approach and its suite of policies should be designed to deliver outcomes that allow positive benefits to be maximised whilst negative adverse effects are minimised.
- 2.5 In the following Sections we comment on various of those Issues.



### 3 The Climate Emergency

3.1 In this Section we comment on the various matters set out in the consultation document under the heading climate emergency.

#### **Net zero greenhouse gas emissions**

3.2 It is widely understood that the built environment is a contributor to greenhouse gas emissions. To reduce emissions associated with energy use, the Government is instigating changes to national policy via the Building Regulations; the Future Homes Standard provides a road map to achieving zero carbon ready homes from 2025.

3.3 Given that this is prior to the proposed adoption of this Local Plan, it is unnecessary for an alternative standard and compliance framework to be a planning policy requirement. Indeed, section 5 of the Planning and Energy Act 2008 states that energy policies in local plans “... *must not be inconsistent with relevant national policy*”. Moreover, paragraph 154b of the NPPF states in relation to greenhouse gas emissions “... *any local requirements for the sustainability of buildings should reflect the Government’s policy for national technical standards*”.

3.4 The clear intention is that major changes to energy efficiency standards will be achieved via building regulations rather than local plan policies. In this regard, there is no basis for exceeding the Future Homes Standard which will deliver homes that are zero carbon ready from 2025.

#### **The energy hierarchy**

3.5 Whilst the delivery of net zero development is assisted by use of the energy hierarchy, its application must be consistent with the approach to energy efficiency to be achieved through the Future Homes Standard and national planning policy. These do not refer to the offset of residual emissions following the application of technical building standards.

#### **The location of new development**

3.6 There is an interrelationship between the location of new development and accessibility to services and facilities. This is discussed in detail in response to matters relating to spatial strategy, however, it is evident from the background papers that locating development at the District’s main settlements (Tier 1 and Tier 2) will contribute to a sustainable pattern of development and maximising the accessibility of future residents to services and facilities. In turn this has a positive effect on the ability to use active modes of travel or public transport and reduce the reliance on the private car.



## 4 Population and Housing

- 4.1 We agree that meeting future housing needs is a central objective for the Local Plan.
- 4.2 The Local Plan should provide sufficient housing in a sustainable manner. In this regard, Local Housing Need should be calculated by reference to the Government's Standard Method in the first instance. This is not a mandatory requirement, but exceptional circumstances must exist to depart from this approach. Even then an alternative approach must reflect current and future demographic trends and market signals. As the Council widely and readily accept, affordability in East Hampshire is particularly acute and it has long been understood that the supply of housing has an effect on affordability.
- 4.3 The consultation document (and the associated background paper) identify that the Minimum Local Housing Need amounts to 632 dwellings per annum for the District and that part of the National Park within the District. The equivalent figure within the Core Strategy is 592 dwellings per annum. These are broadly similar figures rather than a dramatic or significant increase as a consequence of the Standard Method.
- 4.4 The NPPF intends that Local Plans should, as a minimum, provide for objectively assessed needs for housing, as well as needs that cannot be met within neighbouring areas, unless application of its policies provide a strong reason for restricting the overall scale, or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits.
- 4.5 In our opinion, there are no such reasons why the District cannot meet identified needs and certainly the evidence base as assembled presently does not suggest that there are overriding constraints that preclude that. We do not consider that the proposed amendments to para 11(b) of the NPPF give rise to considerations that are germane to East Hampshire.
- 4.6 We recognise that meeting this level of new development will bring about incremental change; settlements will grow and new infrastructure will need to be provided. However, there is no indication that there is an environmental capacity that this level of new development will exceed. Rather, it requires careful selection of sites and planning policies that ensure high quality and environmentally sustainable development.
- 4.7 Disaggregating the District wide requirement between those parts within the National Park and those part outwith it is an important task. The background paper provides an assessment of household growth and affordability for those two constituent parts and estimates two respective quantum:
- 517 dwellings per annum outside the National Park area
  - 115 dwellings per annum within the National Park
- 4.8 Again, these figures are not dissimilar to the disaggregation that occurred between the Core Strategy and the National Park Local Plan. The Memorandum of Understanding provides an apportionment of some 492 dpa outside the National Park area and 100 dpa within the National Park.
- 4.9 On this basis, these are reasonable assumptions as the foundation of the minimum requirement for the Local Plan.



- 4.10 What follows is whether there are reasons why the minimum requirement should be increased.
- 4.11 In this context there is an identified unmet need from surrounding areas that should be considered. East Hampshire is part of the Partnership for Urban South Hampshire. It is widely understood the urban areas within PfSH cannot meet their housing requirement and across the PfSH area there is a level of unmet need. We note that the recently published Main Modifications for the Fareham Local Plan refers to a level of unmet need of 13,000 at October 2021, an increase from 10,750 in September 2020 (MM014, page10).
- 4.12 Similarly, there should be consideration as to whether a greater amount of housing would achieve more affordable homes with a beneficial effect on meeting this need. As the background paper acknowledges, the number of new affordable homes required each year totals 613; or 97% of the total amount of housing proposed. We do not disagree that it would be unrealistic to increase the overall housing requirement to levels that would achieve this many affordable homes each year. However, it must be borne in mind that the affordability adjustment is applied to take account of past under-delivery but is the minimum uplift that will be required. There is no reason therefore why the housing requirement could not be higher in order to deliver a greater number of affordable homes.
- 4.13 Finally, consideration must be had to the likelihood of the National Park being able to increase the amount of housing it provides in its next Local Plan compared to the present apportionment agreement. The assumption in the consultation document is that the National Park will be able to deliver 15% more housing than is presently planned for. This appears to be without foundation at this time. A safer assumption would be to retain the 100 dwellings per annum over the whole of the new plan period; and any increased amount of housing would be an additional benefit.
- 4.14 For these reasons, the amount of housing which the Local Plan proposes, should be greater than the minimum Local Housing Need figure of 517 dwellings per annum.**
- 4.15 There will in any event be a need for the housing supply strategy to allocate sufficient land to ensure this requirement is built within the plan period. As with the earlier 2019 Local Plan consultation, a degree of flexibility or contingency will be required in this regard.



## 5 Types of Housing Needs

- 5.1 The housing market is complex, exhibiting different needs. In the following paragraphs we comment on certain dynamics which the consultation alights upon.

### **Older Persons Housing**

- 5.2 The ageing demographic signals a need to ensure that appropriate housing is provided for that cohort. At the same time the evidence shows a tightening of labour supply as the increase in the economically active persons cohort is much smaller. It will be important that that cohort (typically family aged households) are able to find sufficient and suitable housing in order for the District to retain its labour supply.
- 5.3 The increase in older persons within the District evidenced by the Census, and the projection of further increase in the HEDNA by 2038, supports the provision of specialist accommodation for older persons.
- 5.4 The Local Plan could consider allocating sites specifically for age restricted accommodation; suitable sites are often within or close to main centres with easy and convenient access to services and facilities.

### **Accessible and Adaptable Housing**

- 5.5 It is commonplace for Local Plans to include policies that specify a proportion of new homes are provided as M4(2) and M4(3) category. We would support such a policy provided the proportions sought are realistic and achievable.

### **Home Sizes and Mix**

- 5.6 We agree with the analysis that whilst there are differences between the market and affordable tenures there is no distinct spatial variation. Generally speaking, affordable housing should be geared towards 1- and 2-bedroom accommodation predominantly, the opposite of this is true for market housing where greater proportions of 3- and 4- bedroom homes are required.
- 5.7 Elsewhere, Local Plan's have policies that refer to the evidence of housing mix and require development proposals to reflect that. This is preferable to having the percentages specified in a policy as the evidence might change and not every site is going to be suitable to meet a prescribed mix. Moreover, on the basis that there are degrees of difference between the sub-regions, a range would need to be provided.



## 6 Environment

6.1 The Environment Section of the consultation document culminates in a question as to which environmental consideration is most important to the reader. It is difficult to afford a priority to the four elements – local wildlife habitats, protected habitats and species, conserving rural landscape and natural linkages between habitats – as each is important to a greater or lesser extent in different locations.

6.2 For example:

- Certain aspects of the environment are subject to statutory protection and are plainly important resources.
- The requirements associated with the Environment Act 2021 for biodiversity net gain will result in improvements in local wildlife habitats and the creation of natural linkages as part of that.
- The rural landscape is comprised of different elements; urban fringe locations adjoining settlements are distinct from and different to remote countryside.

6.3 To accommodate new development there will be a change in the character of land that is allocated for development. Landscape resources will change and views will alter, but careful selection of sites will ensure that those changes are experienced only across a small area and none would represent a fundamental change to the character of the District as a whole. In this regard, there is a need to balance the achievement of a sustainable pattern of development, maximising accessibility to services and facilities, and changes to the landscape.



## 7 Development Strategy and Spatial Distribution

- 7.1 The consultation document identifies that one of the main decisions for the Local Plan is where should new homes be built. In turn, the consultation document is inviting views about different high-level principles about the distribution of new development and refers to four options. In this context it is important to understand the spatial pattern presently.
- 7.2 The Settlement Hierarchy Background Papers identifies the relative characteristics of settlements in the District. Alton and Whitehill & Borden and Liphook are three principal settlements in the north and east of the District respectively. Horndean is also a principal settlement in the south of the District. A grouping of smaller service centres then exist which includes Four Marks and South Medstead. Together these comprise Tier 1 and Tier 2 settlements.
- 7.3 Smaller settlements, characterised as having more limited services and facilities are distributed widely across the District. These are Tier 3 and Tier 4 settlements.
- 7.4 In considering spatial distribution, Paragraph 105 of the NPPF is instructive: “*The planning system should actively manage patterns of growth....Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.*”
- 7.5 It is an inescapable fact that the largest settlements in the District give people the greatest opportunity to access services and facilities. This is acknowledged in both the consultation document and the Spatial Development background paper. Accordingly, **the fundamental tenet of the spatial strategy should be Option 2: concentration of new development at the largest settlements.**
- 7.6 We have deliberately expressed this as “at” rather than “in” because it is unrealistic to assume that future development needs can be met without settlements growing and this will require land on the edge of existing urban areas to be identified for new development. Whilst brownfield land should be afforded a priority, it is widely accepted that such resources are limited in their extent and are not sufficient to meet the overall scale of development. Development of greenfield land is therefore a legitimate part of the Local Plan.
- 7.7 As with the 2019 Local Plan, we would anticipate that Alton would make a significant contribution to meeting the District’s future housing needs; plainly this would contribute to a sustainable pattern of development.
- 7.8 That said, we recognise that certain other smaller settlements have locational merits and local housing need that mean they are suitable locations for some new housing. What is important here is that such allocations are commensurate with the scale and character of those individual settlements. Four Marks is a location that benefits from local services and facilities to the extent that it performs the function of a local service centre and it would be wholly appropriate for additional housing to be provided here.
- 7.9 A concentration of development at Tier 1 and Tier 2 settlements would be preferable to a wider distribution. Tiers 3 and 4 should only be allocated lesser amounts of new housing to avoid the negative effects identified in the background paper – namely increased flood risks, limited support for improvements to services, facilities and services at the most sustainable settlements,



a constraint on meeting housing needs where they arise, a more widespread change in the character of the District, and an inherent need to travel to the main settlements to access higher order services in any event. This imposes a degree of restriction on the extent to which Option 1 is an appropriate strategy.

- 7.10 The consultation document also provides information about the scale of population across the District. Clearly to an extent this is influenced by the National Park but it would be logical for those broad proportions to be adhered to; this would suggest that some 80% of the new housing should be in the north of the District; this again underscores the roles of Alton and Four Marks in contributing to this.
- 7.11 As a matter of approach, a new settlement can only represent part of a development strategy in the longer term; experience from elsewhere in the country suggests lead in times from policy formulation to development being in the order of 15 to 20 years. As such, a new settlement cannot represent a means of meeting short and medium term needs. This Option would inevitably need to be complementary to development at existing settlements which are suitable as a matter of principle and the development opportunities that exist in those locations should be fully explored and identified accordingly in the first instance. For these reasons we do not support Option 4.



## 8 Summary

- 8.1 This response to the East Hampshire Local Plan 2021-2040 has been prepared on behalf of Hallam Land Management Limited ('Hallam').
- 8.2 We have identified that, notwithstanding the current consultation relating to the NPPF, it is firmly the case that Local Plans should continue to provide a sufficient supply of housing land to meet identified needs.
- 8.3 In this regard, we agree with the Council that there is no basis to reduce the number of new homes that is planned for on the basis of the Government's Standard Method.
- 8.4 There are however good reasons why this minimum level of housing should be increased; firstly to contribute more to meeting the evidence of affordable housing need, secondly, to meet unmet need from the neighbouring areas, and thirdly, to account for the likely event that the National Park is not able to increase the amount of housing it provides because of its more constrained nature.
- 8.5 Turning to spatial strategy and the distribution of new housing, to manage the pattern of growth and achieve the most sustainable pattern of development will require new housing to be concentrated at Tier 1 and Tier 2 settlements in the North of the District. Alton and Four Marks are two eminently suitable settlements that can contribute towards this strategy.

*LRM Planning Limited*  
*16<sup>th</sup> January 2023*

12 January 2023



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

Dear Sir / Madam

**LOCAL PLAN CONSULTATION 2021-2040: (BETTER HOMES-BETTER PLACES):**

We refer to the above consultation. We make three simple bullet points and then will answer some of the questions posed in your report.

- The overriding need in this local plan is to provide sustainable development, in sustainable locations. We think there were adverse issues with the previous large sites' consultation of 2019, such that some of the sites were not and did not and could not reflect sustainable development (for example Liphook South-East):
- There is not a 5-year housing land supply-this has been an issue in the district for some years.
- Older person's housing provision has not been addressed in any past planning document.

The above issues are all key issues and will we hope be priorities in the plan.

**The questions in your consultation document and our responses:**

**VIS 1, 2 AND 3:**

What is special about East Hampshire? We believe it is special but do not believe that comes across in your document, we think it needs to.

**Issues and Priorities:**

**OV1:** We have already identified some Key Issues. We do not intend to rank them, but we regard all the issues identified in your draft as being important.

**Climate Emergency:**

**CLIM 1 AND 2:** We are not going to rank the five issues. We think a separate Planning Strategy document should address these issues so residents can fully understand all future costs.

**CLIM 6 AND 6A: Accessibility on foot and bicycle:** This appears as part of the climate emergency, and we believe this to be a basic planning consideration. We are fully aware of the 20-minute neighbourhood. We raise a point that this issue and other issues of sustainability needed to be fully factored into your housing land supply assessments and large site's consultation- the latter of which was completely ignored in your councils Large Site Liphook South-East site assessment. This aspect is fundamental to your analysis of development site suitability.

**Population and Housing:**

We think for this type of initial plan consultation this section appears overly complicated. We believe the need is to plan for the HEDNA 2022 estimate.

**Page 21** of the Local Plan Issues and Priorities Paper states a range of views on housing provision have been made-we are not aware of those views it would be useful to know where members of

the public could see that information.

**POP 1 AND 1A:** The higher estimate of 632 dwellings being the later estimate should be used. The other figure is based on information over eight years old.

**HEDNA (Housing and Economic Needs Assessment 2022):**

**POP 2:** No: Please use the need figure plus South Downs:

**POP 4 AND POP 4A: Population and Housing Consultation Question:**

Hopefully, this should be / will be a county council responsibility to oversee the strategic functions and unmet housing needs of all Hampshire local authorities and to also address needs / provision of adjacent authorities. We think this is really beyond the remit of residents to answer as the information is not current.

**Types of Housing Needs:** The sub-division of the district complicates matters and might make it seem less of a district-wide issue. The significant percentage to us is the growth of the 65 years plus age group statistics from the HEDNA of 2022. This is a challenging issue which really needs addressing in your emerging plan.

**HOU 1A AND HOU 2:** It would be timely at this stage of the plan process to get specialists to provide the requisite information concerning the various needs and requirements. This is not a 'one size fits all' housing policy-a wider variety of types and sizes of housing / homes is required as noted in national guidance.

Therefore, in terms of **HOU 1:** Any housing target needs to be assessed with expert information and with engagement and feedback from the specialist providers-showing a range of housing types (note the National Planning Policy Framework and Guidance). This should include a specific consideration of rural area needs, note HAPPI 4. Rural area older persons housing needs are a separate consideration and East Hampshire is a rural area.

**Adaptable Housing: HOU 3:** Yes, guidance required - but specialist advice needed to ensure the guidance is current and pragmatic.

**Large Sites: HOU 4:** There is a requirement to understand the real needs of the older persons' housing market and then to assess the locational / site specific issues prior to endorsing any 'catch all' percentage figure. Each site must be assessed and then an appropriate target figure can be reviewed. This should not be a simple box-ticking exercise, the real needs of each of your three defined district areas must be surveyed and understood. Sustainability being the key consideration. There are smaller sites suitable for older persons' housing. We make specific reference to Liphook, which is a sustainable tier 1 settlement. The Portsmouth Road area at Little Bohunt is an eminently sustainable location and the housing land availability assessment needs to fully engage the 20-minute neighbourhood issue. In this location there is easy and safe access to a range of community facilities, with public transport options and ease of walking and cycling-all within a small area of the town centre. These aspects need to be fully incorporated as part of the plans emerging housing strategy.

**HOU 5 AND 5A: Percentage of smaller homes:** Up to date survey information is essential-by that we mean older persons housing survey information-which will give a picture of current and emerging housing needs. That will give information on the right sort of housing which older persons' might need-in your district. It is not necessarily downsizing but 'rightsizing'-which obviously could be smaller

homes-but the need is for housing choices so older persons have the opportunity and incentive to move from larger / under-occupied properties to homes / housing more appropriate to their needs-thus releasing 'family homes' and providing a more equitable housing solution in the district.

**HOU 6 AND 6A:** Any answer to this question must be based on up- to- date survey information.

However, a greater proportion of age protected appropriate housing choices need to be provided. Any written policy needs to address this aspect. There needs to be a greater supply of housing choices particularly 1-2-3 bed units in most larger housing sites, but any prescriptive policy should be soundly based on current population and local housing survey information be that for older persons or younger persons.

**HOU 7 AND 7A:** Government guidance is crucial. As the local plan team will be aware questions of site viability need to be factored in as part of any target policy. As to affordable housing provision with respect to protected older persons' C3 housing – that needs careful consideration. Older persons' housing is more expensive to provide. For example, older people in general do not buy off-plan, therefore a higher initial capital outlay is required; this is a real concern as older persons' housing providers compete for sites against open market housing operators.

#### **DEVELOPMENT STRATEGY AND SPATIAL DISTRIBUTION PAGE 52:**

It is stated that *"we have an up- to- date evidence base, which has refreshed our understanding of the amount and type of housing that's needed."* We question this statement- actually, we feel more survey information is required. We think health should be mentioned in the report- and as part of the local plan process, however we find no mention this is surely an oversight.

**Options 1 to 4:** All options need to be explored with need assessments, which includes liaison with each parish and town council and much more detailed planning concerning constraints etc. The housing land and large site assessments had shortcomings due to the absence of a robust sustainability assessment of each site and location-some preferred sites were unsustainable. We agree Liphook is a tier one settlement (a higher order settlement suitable for more development) but only with respect to sites within the 20-minute neighbourhood context.

**OPTION 4 NEW SETTLEMENT DEV 1:** Option 4 we cannot see the point and see no convincing case made. Which is why it is essential to review all plan constraints and then decide on the best strategy. We are not going to rank the options. Basic planning groundwork on mapping and listing development constraints we assume is not finalized. We suggest this information is shown in a plan format for the three district plan areas-only then can choices be made on options for development.

We thank you for your consideration in this matter and look forward to hearing from you as the plan progresses.

Yours faithfully

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Planning Policy  
East Hampshire District Council  
Penns Place  
Petersfield  
Hampshire  
*By email*

13<sup>th</sup> January 2023

Our Ref:  
Your Ref:

Dear Sir / Madam,

**East Hampshire Local Plan 2021-2040: Consultation on;  
Issues and priorities Regulation 18 - Part 1  
Town and Country Planning (Local Planning) (England) Regulations 2012**

I write in response to the above. The purpose of this letter is to provide representations on behalf of our client, Bloor Homes Ltd. to the ongoing consultation by East Hampshire District Council and in particular to the sections and housing need, development strategy and spatial distribution.

We act for Bloor Homes Ltd in respect of promotion of land previously included in the, now withdrawn, 2018 Draft Local Plan identified as site SA2 in that plan and by reference LAA/LIP-017 in the Council's Land Availability Assessment.

We note that further to the withdrawal of the Draft Local Plan in mid 2022 at this earlier stage of the plan process the Council's consultation under Regulation 18 seeks comments and information on the key issues and priorities that should be addressed in the new Local Plan. The consultation covers the following broad topics, are identified in summary within the plan as follows:

- The Climate Emergency
- Population and Housing
- Types of Housing Needs
- Environment
- Infrastructure

- Development Strategy and Spatial Distribution

In this letter we focus on housing need and development strategy and spatial distribution. Appended to this letter we enclose a table of further replies to any other particular questions under the other above topics. We do not offer replies to all other questions individually.

### **Development Plan Context**

The development plan for EHDC comprises a suite of documents but is based upon the Joint Core Strategy (Local Plan Part 1) which was adopted jointly by East Hampshire District Council and the South Downs National Park Authority in 2014.

In January 2018 East Hampshire District Council embarked on a review of their local plan. The Council announced its timetable for the production of the revised plan in its published Local Development Scheme, including that the new plan would, by now, have been adopted.

EHDC published its first Draft Local Plan proposals which were approved for consultation purposes by the Council's respective Cabinet and Full Council later in 2018. The draft plan set out the case for meeting additional forecast housing need over a 15-year period to 2036. The government requires (through national policy – see below) that local plans are kept up-to-date and formally reviewed every five years as a minimum. The delay in preparation of the draft plan is now almost five years in itself while the adopted spatial strategy is nearing the point where it should have been reviewed twice.

Given these timing-related issues, it will therefore be very important to mitigate the amount of further work and delay publishing and adopting a new plan. As the consultation shows, there are several important issues to which an up-to-date development plan can be expected to respond. These include the climate emergency, and local and national housing crises<sup>12</sup>.

While the draft local plan was withdrawn to allow for further consultation it will remain a useful base from which to start preparing a new plan especially if there is no evidence that alternative strategies should be pursued.

### **National Planning Policy Context**

These representations are prepared in the context of national planning policy and guidance which stipulate the tests for the preparation of a 'sound' local plan at paragraph 35.

For these representations, we particularly note the context offered by Paragraphs 11, 31, 33, 60, 61, 64, 66, and 68 of the Framework which state;

*11. 'Plans and decisions should apply a presumption in favour of sustainable development...*

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<sup>1</sup> "What is the housing emergency?" Shelter - <https://england.shelter.org.uk/>

<sup>2</sup> "East Hampshire's plan to tackle affordable housing shortage in one of 'UK's most unaffordable places" Hampshire Live - <https://www.hampshirelive.news>

- 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;*
- b) *strategic policies should, 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, unless:*
- i. *the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area<sup>7</sup>; or*
  - ii. *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.*
31. *The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals.*
33. *Policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary.*
60. *To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.*
61. *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...*
64. *Provision of affordable housing should not be sought for residential developments that are not major developments...*
66. *Strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period...*
67. *Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability.*

Running concurrently with the consultation by East Hampshire District Council is, now, an open consultation by DLUHC on the 'Levelling-up and Regeneration Bill' reforms to national planning policy and indicative changes to the National Planning Policy Framework. Significant changes may require the Council will consider these matters again but that is not clear at this stage. What is clear is that the government is not proposing any changes to the standard method formula itself as it "remains important [to]... have a clear starting point for the plan-making process". Moreover (at chapter 4 para. 5) the Government makes clear its position that *"changes are designed to support local authorities to set local housing requirements that respond to demographic and affordability pressures while being realistic given local constraints. Being clearer about how local constraints can be taken into account and taking a more proportionate approach to local plan examination is intended to speed up plan-making."*

## **ISSUE: Population and Housing**

### **POP 1 – How do you think we should proceed?**

The consultation sets out as context that (pp24) there is no need to depart from the standard method being that there is not a significant difference between the predicted district-wide need for housing and the output from the standard method calculation. Therefore, a district-wide requirement of 517 homes per annum is suggested by the Council.

However, the Council is seeking to explore an 'exceptional circumstances' route whereby the provision of a proportion of homes are delivered in the South Downs National Park portion of the district and are not part of the housing requirement for EHDC. The 'Housing needs and requirement' topic paper sets this out at 4.23.

Accordingly, the Council is suggesting a housing requirement of 517 homes per annum in the plan period (2021-2040) for the District and 115 for the National Park.

The Council should instead use the adopt the full standard method figure for the district (i.e. 632 dpa) **and** should set out to test how it can go further to address latent unmet and forecast affordable housing need in the district.

The Council, overarchingly, needs to prepare a replacement local plan quickly and efficiently. It is therefore vital that it has a solid foundation.

### **'POP 2 – Are there any strong reasons not to use the housing need figure of 517 new homes per year for the Local Plan?'**

Yes. We raise concerns on three aspects with the suggested adoption of a 517 dwellings per annum housing requirement for the local plan.

### *Local Housing Need Methodology*

Firstly, the methodology used to identify the 'Local Housing Need' figure disaggregates the application of the affordability ratio to separated projections for EHDC and the National Park.

This is incorrect for two reasons. It suppresses the overall total district figure by 11 dwellings per annum as (in arithmetical terms) it double counts the deduction applied within the affordability adjustment. Applying an overall median affordability ratio to the 381 combined household growth figure produces a combined figure of 632 per annum (and not 621 as reached by the topic paper's approach).

It is also inappropriate to disaggregate affordability in this way as while the areas within the National Park will endure higher house prices and rents due to the promotional qualities of the park, they are not discrete from influencing the demand for housing within adjacent areas in the district. As prices rise in the national park so they will displace purchasers and renters into more affordable areas increasing demand which supply must keep pace with.

The Council should, at this early stage, recognise the full Standard Methodology derived housing requirement (i.e. 631 homes/annum).

### *Reliance on SDNPA*

It is also sequentially inappropriate not to explore higher housing requirement figures within the District to reduce the effects on the national park which is a) an area that is of the highest environmental quality and b) features only one sustainable settlement (Petersfield). The significance of the national park to the District meeting needs is overstated/relies upon given the remainder of the park area within the District is rural in type and generally unsustainable for development and growth of the scales required.

We therefore believe it would be very clearly incorrect to rely on the South Downs National Park Authority to provide a proportion of the Standard Method calculation requirement without robust testing.

The South Downs National Park Authority is not under the same policy obligation to meet its objectively assessed need as the District. The SDNPA also has a much more recently adopted plan than East Hampshire (July 2019), which does not need to be reviewed until mid-2024 and we note the government's significant changes in respect of the Duty to Cooperate.

### *Meeting Affordable Housing Needs, Tackling Affordability*

The 'Housing needs and requirement' topic paper suggests that there is no need to further increase the housing requirement to help address unaffordability (4.17) as that is part of the Standard Method's calculation. The topic paper also concludes that meeting the entire affordable housing need in the district is unrealistic so should not be pursued (4.16). Both conclusions are grounded in planning theory, and do not engage objectively with the reality of the situation or the very real societal impacts caused by these issues.

The potential to further increase the supply of affordable homes is further dismissed on the assessment that the ratio of affordable to market homes achieved historically has been “only 25%”. That may be correct but it is misleading to suggest policy cannot secure levels higher than this as it has on countless sites in the past 10 years in the district and ignores the capability of policy to secure above that in the future. We believe the stated “25%” is likely to be significantly skewed by windfall development (often too small for policy to require affordable housing), and by the Council’s centrepiece Whitehill and Bordon allocation. The latter making up over two-thirds of housing allocated by the 2014 plan, but agreed by the Council to provide just 15% affordable housing. There is no evidence presented that the present policy requirement for 40% affordable housing (JCS policy CP11) is not viable moving forwards.

The Standard Method housing requirement does include an adjustment for affordability and does provide the starting point the Council in government policy and guidance terms but an acute backlog of affordable housing delivery needs and the critical and worsening trends in affordability justify exploring a much higher housing requirement. Without this the Council will not be setting out to prepare the plan positively, contrary to paragraph 11 of the Framework. The Council should employ a much greater emphasis on meeting affordable housing need in the district is needed and much higher housing requirement scenarios should, accordingly, be tested rigorously.

The May 2022 ‘Housing and Employment Development Needs Assessment’ (HEDNA) shows just how much the district suffers particularly from acute affordability issues, trends of rising unaffordability and a shortfall in housing to meet needs. It reveals;

- East Hampshire is one of the UK’s most unaffordable places to live in the UK. Median values of house sales in East Hampshire significantly outstrip regional prices, by 15% or £52,500, as well as national prices, by 51% or £138,500.
- There are 1,700 households presently living in unsuitable housing ignoring current social tenants and the majority of owner-occupiers (in total it is 3,074).
- An increase in median household incomes from 2013 as EHDC adopted the Joint Core Strategy (para. 3.58, SHMA, 2013) to £41,900 has been significantly outstripped by the increase in house prices in real-world affordability terms making home ownership much less affordable than in 2014.
- Essential workers in households with single incomes will make even affordable home ownership “difficult” (HEDNA 7.139) and indeed *“Analysis does suggest that there are many households in East Hampshire who are being excluded from the owner-occupied sector”*. (7.45)
- Rental price increases have also been significant relative to wage growth, with the median monthly rental price for a 3-bed home now costing 29% more than in 2012 (i.e. consuming the entire uplift in median wage in the same period).

The already acute lack of affordable housing within the district has significant real-world implications for those struggling to acquire or afford to own or rent a home. These are directly affected by the provision of an adequate supply and choice of homes. These are not factored

in by the Standard Method. For example Hampshire Home Choice shows current 'average waiting times' for a family in Band 2 will already wait between 1.75 years and almost 4 years for a 3 bedroom property in East Hampshire.

The HEDNA confirms (para. 5.30) that the District needs 613 affordable homes each year to meet the need in full but that doing so would be very challenging and 'unrealistic'. While we agree with the HEDNA that the required 1,535 homes per annum might well prove ultimately to be unrealistic (having regard to the district's spatial characteristics and historic trends) we would fundamentally disagree that the Council's starting point should be to reject testing the feasibility of higher housing requirement thresholds and instead set by the figure in step with the Standard Method (which are adjusted according to affordability ratios and not latent need).

As a minimum the Council should consider adding an uplift to tackle the large majority of the 1,700 backlog in affordable housing already needed presently and urgently. Having regard to paragraphs 19 and 21 of the Inspector's report on the 2014 Joint Core Strategy, it is clearly important not to underestimate the need for affordable housing in the district or to evaluate all options for resolving it in full or in part. Adopting the full Standard Methodology requirement (recalculated to 631 dpa) would increase delivery by 2,185 homes over the plan period could provide 874 affordable homes (at 40%) from allocated sites meeting over 50% of the present backlog. The Council should model additional for housing to meet the remaining latent shortfall.

**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)~~

By meeting the full Standard Methodology figure for the District, as suggested as a minimum above, the Council will arguably have met the SDNPA's housing needs outside of the park assisting affordability and a portion of latent affordable housing need.

The Council should as part of its testing of a higher housing requirement (i.e. above 632 dpa) consider the implications of meeting an additional ~115 dpa (i.e. the SDNP requirement) within the District. This will result in an annual housing requirement of c.750 dwellings per annum (dpa) and provide similar levels of growth (at 230dpa above the Council's suggested 517dpa) necessary to secure sufficient affordable housing to resolve the backlog of 1,710 affordable homes.

**'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

The priority in this respect should be to identify where evidence bases and plan progress are likely to offer robust alignment and synergy and to scope out options which may give rise to significant delay. The Council is already encountering difficulties in sustaining an ageing plan, and significant delays since its 2018 publication of a Draft Local Plan and it is of overarching importance to ensure rapid and smooth adoption of a replacement local plan in the near future. We offer no other comments on this question.

## **ISSUE: Development Strategy and Spatial Distribution**

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

1. Option 2: Concentrate new development in the largest settlements **PREFERRED**
2. Option 1: Disperse new development to a wider range of settlements NOT SUPPORTED
3. ~~Option 3: Distribute new development by population~~ NOT SUPPORTED
4. ~~Option 4: Concentrate development in a new settlement~~ NOT SUPPORTED

### **'DEV2 Why have you ranked these options in this way?'**

As set out by Option 2, (pp57 of consultation) and pp9 of the Spatial Development Options Background paper which includes Tier 1 and Tier 2 settlements, we consider that concentrating development in the largest settlements is equivalent, in an East Hampshire context, to selecting the most sustainable settlements (and therefore most suitable locations) to absorb development and meet needs within the district.

This presents the scope to reinforce the sustainability and elements which make up such of those settlements.

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

The NPPF asserts that achieving sustainable development is founded upon three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways. The consideration of the most suitable strategy for the location for the distribution of housing must have considered this and be founded on a collection of appropriate high-level principles.

In response to questions DEV1 and DEV3, therefore we promote Option 2 of the choices given and consider the following strategy should be pursued by the Authority noting that housing growth should not be considered in isolation of the planned provision of employment, infrastructure, and other development.

Housing growth should be directed to (1) the most 'sustainable' settlements and where those (2) offer the capacity for sites to already take advantage of those elements that make the place

sustainable in the first place, or the capability to reinforce connectivity and infrastructure to achieve the same.

Having regard to reference in the consultation documents to '20-minute neighbourhoods' we refer to the TCPA document of the same name which notes such are... **(our emphasis added)**

*"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.** These places need to be easily accessible on foot, by cycle or by public transport – and accessible to everyone, whatever their budget or physical ability, without having to use a car. "*

East Hampshire is a predominantly rural authority in geographic terms and the configuration of settlements may often not allow for the easy application of a '20 minute neighbourhood approach'. Nonetheless, the large majority<sup>3</sup> of the district's population (outside of the national park) in each subarea is found within key settlements including Alton and Four Marks (85% of 'North West'), Bordon, Liphook (87% of 'North East') and Horndean, Clanfield, and Rowlands Castle (80% of 'Southern Parishes').

The assessment of settlement hierarchy provides a robust approach to evaluating the relative sustainability of settlements. The Council has already begun to rank settlements based upon their access to local facilities and services in its background paper on 'Settlement Hierarchy'. The scoring of this should be refined giving careful consideration to qualitative factors and a greater 'values' to essential than desirable local services/facilities based on their day-to-day importance to local community life but also the prospect of reducing reliance on and travel to other settlements to fulfil such needs.

Turning to the background paper's conclusions, Alton, Liphook, Whitehill & Bordon, and Horndean are by far the most sustainable settlements and the only settlements to offer both primary and secondary education and access to all of the following;

- Supermarket
- Creche/Day Nursery
- Café & Restaurant
- GP Surgery and Pharmacy
- Post Offices
- Other Convenience and Comparison Shopping
- Community Hall
- Sports Pitches
- Employment Clusters
- Bus Services
- Pubs

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<sup>3</sup> Based upon 2021 and 2011 ONS Census data

The presence in Alton and Liphook of each of the following, in addition, elevate their credentials further;

- Mainline railway station with parking (offering good connections to London Waterloo every 15-30 mins during commuter hours, journey times 1hr-1hr 15mins)
- Dentist
- Libraries
- Leisure Centre/Indoor Sports
- Youth/Social Club

The assessment omits reference to some other important facilities such as 6<sup>th</sup> form education, and does not qualify the extent of facilities (such as a range of cafes and eateries) to provide a qualitative comparison. Consideration should also be given to new or emerging facilities, such as in Liphook the recent establishment of a local cinema, and the enhancement of the local A3 services with a McDonalds restaurant. Emerging facilities are also 'planned in' or occurring off the back of large-scale sites elsewhere such as at Horndean. Such consideration, added to the present assessment would see the four major front runners pull further ahead as sustainable places *to live in and around* maximising local use and reducing the relative frequency/desirability of travel out of the settlement.

The significant balance of new housing sites should therefore be directed to these 4 no. principal settlements in the first instance. Housing growth will need to be directed to other lower order settlements on the basis of meeting needs locally, supporting existing services and reducing the scale of housing needed in the principal settlements.

Should the Council need to disperse additional growth beyond the main settlements (and not just to meet local housing need) as is likely, then its selection methodology for the next tier of performing settlements should consider a greater qualitative score for settlements that benefit from proximity to the above most sustainable ones (which are spread into each of the three sub-areas) or where clusters of services are accessible between smaller settlements and realistically promote a reduction in longer distance car travel and opportunities to commute regularly by alternate modes. On the above basis, settlements like;

- Grayshott – relatively close to Whitehill & Bordon and Liphook
- Clanfield – close relationship with Horndean
- Four Marks/South Medstead – reinforced by proximity to Alton

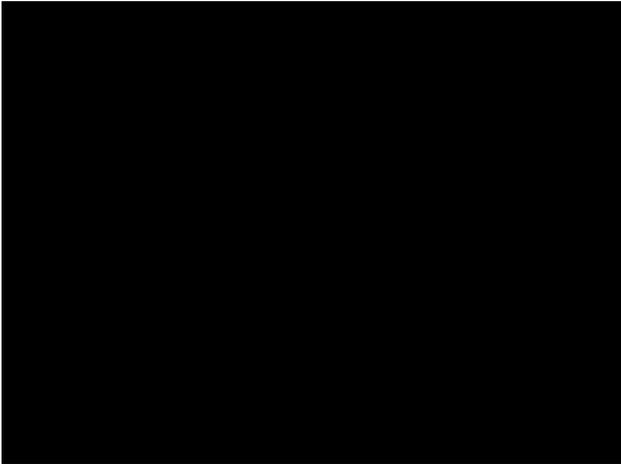
would be seen as preferable as they can take advantage of their own relative facilities, but are bolstered by accessibility to principal choices.

## Conclusions

We trust our comments and advice will be taken into careful consideration and look forward to the Council's feedback on this consultation in the near future.

Please do not hesitate to contact me if you have any queries.

Yours Sincerely,



EHDC Consultation Question	Response
<p><i>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.</i></p> <p><b>VISI</b> How do you feel about this vision? (very happy / happy / neutral / unhappy / very unhappy)</p>	<p>We support the vision as set out.</p>
<p><b>VIS2</b> Does the vision cover the key matters of importance that the Local Plan can influence and inform?</p>	<p>No comments.</p>
<p><b>VIS3</b> Should the vision be more specific about areas of the district being planned for through the Local Plan?</p>	<p>No.</p>
<p><b>OVI</b> Please sort these key issues and priorities in order of importance to you</p>	<p>No comments.</p>

<p>Climate Emergency Environment Population and Housing Types of Housing Needs Infrastructure</p>	
<p><b>CLIM1</b> Do you agree that new development should avoid any net increase in greenhouse gas emissions, wherever practicable?</p>	<p>At present legislation is clear that Local Planning Authorities must set levels of sustainable construction which are consistent with national planning policy and in turn the present requirements are set by Optional Technical Standards under Building Regulations.</p> <p>New development should seek to balance environmental sustainability with commercial viability to ensure the delivery of development to meet needs. Requirements will need to be robustly tested to ensure they do not render development unviable and this will be a separate key consideration for the preparation of the plan.</p> <p>At present it is unclear whether the availability of technologies and the cost of those to developers can be delivered at scale and without rendering development unviable in tandem with other project requirements including contributions to infrastructure (CIL/S106) and meeting other policy requirements in the majority of cases.</p>
<p><b>CLIM2</b> So far, you've told us the following - but what's most important to you? (Sort in order of importance).</p>	<p>No additional comments.</p>

<ol style="list-style-type: none"> <li>1. <i>That the construction of new buildings should use less fossil fuels and more recycling of materials</i></li> <li>2. <i>That all new buildings should be zero carbon</i></li> <li>3. <i>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</i></li> <li>4. <i>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</i></li> <li>5. <i>That trees and other green infrastructure could play an important role in reducing flood risks</i></li> </ol>	
<p>Defining 'Net Zero Carbon Development' for the East Hampshire Local Plan</p> <p>A best-practice definition is considered to be one whereby:</p> <ul style="list-style-type: none"> <li>• 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;</li> <li>• The remaining energy demand is met with the equivalent amount of renewable power generation, either onsite or offsite;</li> <li>• 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.</li> </ul>	

<p><b>CLIM 3</b> Do you agree that the Council should define ‘net-zero carbon development’ in this way?</p>	<p>This question is too generalised and the definition too broad to sensibly apply to development across all sectors. Based on the level of information available it is premature to judge whether this definition is appropriate – it will have policy and delivery implications as and where policies refer to the definition. Any such definition, of what is required by the local plan, should also be subject to and dependent on a proper technical review.</p> <p>We note that the definition would seem to go beyond the government’s own strategy and therefore likely beyond near term revisions to the NPPF/national policy and guidance. This is important as government regulation will provide standardisation and reliability across LPAs for achieving goals. This is set out in the “Net Zero Strategy: Build Back Greener” (October 2021), where the government also shows a diverse strategy for different sectors/types of development e.g. “New Buildings’ (para 31, pp146) the government intends a phased approach for housing, and a different approach for non-domestic buildings (para 38, pp147).</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?</p>	<p>The Council’s policies should reflect national planning policy in order to be considered ‘sound’, and are limited by other legislative factors.</p>

<p><b>CLIM5</b> Should the detailed criteria for tackling climate change be specified in any of the following;</p> <ul style="list-style-type: none"> <li>- In the emerging East Hampshire Local Plan</li> <li>- In future neighbourhood plans</li> <li>- In local design codes</li> </ul>	<p>At present legislation is clear that Local Planning Authorities must set levels of sustainable construction which are consistent with national planning policy and in turn the present requirements are set by Optional Technical Standards under Building Regulations.</p> <p>It is appropriate, particularly given the pace of change and the need to provide certainty to the development industry, to expect that targets for sustainable construction will and should remain within National Planning policy (recognising that pursuing sustainable construction through a Net Zero Strategy is only one part of the governments wide ranging decarbonisation plans). At this stage there is no evidence to suggest it is robust to use local policy to set local targets.</p>
<p><b>CLIM6</b> 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).</p>	<p>No comments</p>
<p><b>HOU1</b> What should a specific policy on older persons accommodation include? (select one or more options)</p> <ul style="list-style-type: none"> <li>• A specific target in terms of numbers of homes for older persons accommodation to be delivered within the plan period</li> <li>• Specific types of homes to be provided</li> <li>• The location of these homes across the district</li> </ul>	<p>Within the context of an aging population, there is no evidence to suggest that market housing does not meet the needs of a proportion of older owners/occupiers and that the Care sector / market cannot also facilitate a supply of dedicated specialist accommodation.</p>

	<p>As Dr Elizabeth Webb, head of research at Age UK, is quoted (by the ONS) as saying;  <i>“Older people don’t all fit neatly into convenient boxes and stereotypes. They are enormously varied in terms of their age, health, capabilities, independence, disability, their caring responsibilities, engagement with the labour market, incomes, and the extent to which they’re dependent on the state. There are also other diversities like ethnicity, sexual orientation and gender identity. Later life is diverse and complex.”</i></p> <p>A range of housing types may be encouraged by policy, but, any restrictive policy provision stipulating that at a site level a housing mix must include older persons accommodation (which would in any event be promoted by the market where there is evident demand) should only be included if based on a specific and robust assessment of need at the local level. Adaptation and future proofing is already built into Part M standards under the Building Regulations. Further prescription would be unnecessary and unhelpful.</p>
<p><b>HOU3</b> Should the Local Plan include a specific policy on adaptable housing?</p>	<p>Yes. Clarity on the proportion of adaptable homes within policy on housing mix/development standards would be helpful to forecast the implications on a development and will enable the Council to ensure robust viability testing of its policies.</p>

<p><b>HOU4</b> Should there be a requirement on large sites for a percentage of new homes to be adaptable?(Y/N)</p>	<p>Yes, but the policy approach should include flexibility that recognises that not all sites (e.g. due to topography) or developments (e.g. conversions of listed buildings) will necessarily be suitable.</p>
<p><b>HOU5</b> Should the Local Plan include a policy to specify the percentage of smaller homes on development sites?</p>	<p>No. Policies requiring housing mix to reflect needs and demands in their area, having regard to the latest available evidence are sufficient and more flexible in application. Policy requirements may become quickly out of date.</p>
<p><b>HOU6</b> Should a percentage of smaller homes to be provided on:</p> <ul style="list-style-type: none"> <li>• All development sites or</li> <li>• Only large development sites (over 10 units) (select one option)</li> </ul>	<p>A range and mix in type and sizes of housing will typically be included on the majority of larger development in any event. The mix of market housing will be brought forward by developers based upon market signals while affordable housing mix will be derived through discussions at the appropriate time with the Council’s Housing Officer and Registered Providers. There is not a need for prescription within policy.</p>
<p><b>HOU7</b> The current requirement is that 40% of new homes on qualifying sites are affordable homes. Should the % requirement for affordable homes be:</p> <ul style="list-style-type: none"> <li>• Increased</li> <li>• Decreased</li> <li>• Stay the same (select one option)</li> </ul>	<p>Provisions should be considered in the context of need and viability. Policy will need to be subject to viability testing and it is for the council to bring forward and test further evidence. The NPPF encourage viability testing to be frontloaded to the plan making stage and therefore it is important that sufficient flexibility is incorporated into the policy to maximise <u>achievable</u> sites and the amount of affordable housing they can <u>deliver</u> being brought forwards quickly. The Council should not look at 40% provision in isolation of the benefits of the range of different types and tenures of affordable housing and affordable home ownership.</p>

<p><b>HOU8</b> Are there any other forms of housing that the Local Plan should refer to?</p>	<p>The Council should clarify expectations for self-custom build homes within development projects will be helpful to forecast the implications on a development and will enable the Council to ensure robust viability testing of its policies.</p>
<p><b>ENVI</b> Which of the below environmental considerations is most important to you?</p> <p>Sort in order of importance, from the most important to the least.</p> <ul style="list-style-type: none"> <li>• Achieving improvements to local wildlife habitats;</li> <li>• Protecting the most vulnerable existing protected habitats and species;</li> <li>• Conserving the character of rural landscapes;</li> <li>• Creating better natural links between existing habitats.</li> </ul>	<p>No comments.</p>
<p><b>INF1</b> What type of infrastructure is most important to you? <i>(Sort in order of importance)</i></p>	<p>No comments.</p>
<p><b>INF2</b> How do you feel about the allocation of CIL funds to date? (Very happy / Happy / Neutral / Unhappy / Very unhappy).</p>	<p>No comments.</p>

<p><b>INF3</b> Which of these do you think provides the best outcome for infrastructure provision? (Select one option)</p> <p>Many small sites dispersed across the district / Medium sized sites / Large sites / A mix of these</p>	<p>The optimum approach is through the allocation of large sites. Second to that will be a mix of medium and large sites, which are preferable to small sites for several reasons. First the prediction of infrastructure effects, capacity and mitigation becomes more predictable than with a reliance on small piecemeal development, notwithstanding CIL contributions. Secondly the quality of assessment through planning applications improves significantly adding further robustness to the infrastructure planning process. Thirdly medium and large sites can support the provision of bespoke infrastructure assessment and improvements, drive mixed use development, and comprise better social and environmental infrastructure.</p>
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Planning Policy  
East Hampshire District Council  
Penns Place  
Petersfield  
Hampshire  
*By email*

13 January 2023

Our Ref:  
Your Ref:

Dear Sir / Madam,

**Land west of Bighton Hill, Ropley, East Hampshire.  
East Hampshire Local Plan 2021-2040: Consultation on issues and priorities Regulation 18 - Part 1  
Town and Country Planning (Local Planning) (England) Regulations 2012.**

I write in response of the above to provide a representation on behalf of our client in respect of the above Local Plan consultation

We act on behalf of the land owner of land to the west of Bighton Hill, Ropley being immediately adjacent to land previously allocated within the now withdrawn, 2018 Draft Local Plan, as Site SA30, for between 55 and 66 dwellings.

We note that further to the withdrawal of the Draft Local Plan in mid 2022, at this early stage of the plan, the Councils' consultation under Regulation 18 seeks comments and information on key priorities. This letter therefore focuses on development strategy and spatial distribution only.

**Development Plan Context**

The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and should take into account relevant market signals. Policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years and should then be updated as necessary.

To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.

**Development Strategy and Spatial Distribution**

We rank the options in order of preference as follows;

- **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

The development strategy and spatial distribution should, in our view, prioritise the growth of settlements that benefit from access to key services and provide sustainable development, such as Ropley. This should be in combination with the proportionate growth of other settlements and also potentially the creation of a new settlement.

### Land west of Bighton Hill

Whilst we appreciate that the current consultation is not site specific, as an example, a suitable site for a sustainable development within Ropley which meets the aims of a '20-minute neighbourhood' is land west of Bighton Hill. This site adjoins the existing settlement and would appear as a natural extension to the village's existing built form. The site has easy walking access to an extensive range of services and facilities, and prospective residents could therefore easily meet their day-to-day requirements by foot or cycle in Ropley, with higher order shops and services in Alton and Winchester, which are accessible by public transport.



Figure 2:  
Illustrative Layout  
of proposed site  
allocation on  
settlement  
boundary edge  
with extensive  
areas of Public  
Open Space and  
parking for  
Watercress Line.

The summary reason for the previous site allocation in the withdrawn local plan within Policy SA30 is as follows:

*“The site will contribute towards meeting the need for housing in the area. The adjoining residential areas provide a suitable context for residential development and the site has the potential for good and safe access to/from the A31. Development at this location could consolidate the existing settlement pattern without detriment to local character.”*

The proposal as shown above would be a betterment to the previous site allocation – SA30, as the scheme would provide a public car park for the train station offering a significant community benefit. This scheme

would also set the development's built form further down the slope, reducing the visual impact of development from the surrounding area, as well as creating a significant area of public open space. It is considered that with appropriate masterplanning and landscape mitigation, the site could be developed in a sensitive manner responding appropriately to its wider context.

The site is deliverable in terms of 'availability', 'achievability' and 'suitability' and is within the control of two landowners who are supportive of residential development proposals. There are no overriding constraints to development, meaning that the development of the site within the short-medium term is therefore achievable.

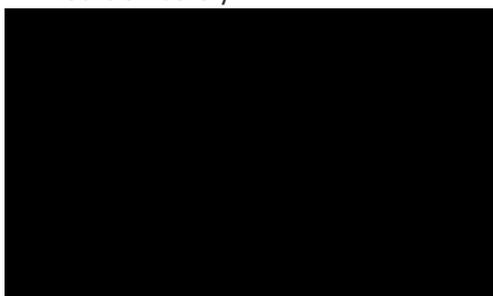
### **Conclusion**

As has been discussed in this letter, site allocations should prioritise sustainable locations adjoining villages to ensure the continued viability of settlements and to provide new homes throughout the District. The Regulation-18 draft Local Plan should therefore promote the reasonable and proportionate extension of existing villages to assist in meeting its housing needs.

We trust our comments will be given careful consideration and look forward to the Council's feedback on this consultation in the near future.

Please do not hesitate to contact myself if you have any queries.

Yours Sincerely



Planning Policy  
East Hampshire District Council  
Penns Place  
Petersfield  
Hampshire  
*By email*

13 January 2023

Our Ref:  
Your Ref:

Dear Sir / Madam,

**Bentley, School Lane, East Hampshire.**

**East Hampshire Local Plan 2021-2040: Consultation on issues and priorities Regulation 18 - Part 1  
Town and Country Planning (Local Planning) (England) Regulations 2012**

I write in response of the above. The purpose of this letter is to provide a representation on behalf of our client to the consultation by East Hampshire District Council.

We act on behalf of our client Seaward Properties Ltd for a promotion of Land at School Lane, Bentley. The site would provide circa 12 new houses to the local area.

We note that further to the withdrawal of the Draft Local Plan in mid 2022, at this early stage of the plan, the Councils' consultation under Regulation 18 seeks comments and information on key priorities. This letter therefore focuses on development strategy and spatial distribution only.

**Development Plan Context**

The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and should take into account relevant market signals. Policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years and should then be updated as necessary.

To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.

**ISSUE: Development Strategy and Spatial Distribution**

We rank the options in order of preference as follows;

- 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

The Draft Local Plan seeks feedback on its development strategy and spatial distribution and in our view, the growth of settlements should be concentrated in those villages that benefit from access to key services and provide sustainable development, such as Bentley.

### **Land at School Lane, Bentley**

Whilst we appreciate that current consultation is not site specific, as an example, a suitable site for a sustainable development within Bentley, and which meets the aims of a '20-minute neighbourhood' is Land at School Lane, Bentley. This site, see figure 1, immediately adjoins the existing settlement boundary and would appear as a natural extension to village and dwellings along School Lane. The site has easy walking access to an extensive range of services and facilities, and prospective residents could therefore easily meet their day-to-day requirements by foot or cycle in Bentley, with higher order shops and services in Alton and Farnham, which are accessible by public transport.



Figure 1: Red shaded area showing extent of available and deliverable site for development with Bentley.



Figure 2: Red shaded area showing extent of deliverable site for development on School Lane.

It is considered that with appropriate master planning and landscape mitigation, the site could be developed in a sensitive manner which responds appropriately to its character and wider context adjacent to the existing settlement area, as shown in Figure 2.

The site is deliverable in terms of 'availability', 'achievability' and 'suitability' and is within the control of a single landowner who is supportive of residential development proposals. There are no overriding constraints to development, subject to the implementation of the improved public footpath connections and open space enhancements, meaning that the development of the site within the short-medium term is therefore achievable.

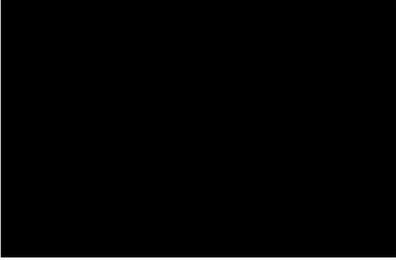
### **Conclusion**

As has been discussed in this letter, site allocations should prioritise sustainable locations to ensure the continued viability of settlements and to provide new homes throughout the District. The Regulation-18 draft Local Plan should therefore promote the reasonable and proportionate extension of existing villages to assist in meeting its housing needs.

We trust our comments and advice will be taken into careful consideration and look forward to the Council's feedback on this consultation in the near future.

Please do not hesitate to contact myself if you have any queries.

Yours Sincerely

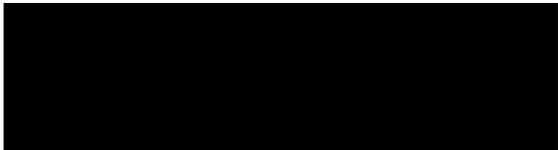


16<sup>th</sup> January 2023

The logo for Black Box Planning features the words "Black Box" stacked above "Planning" in a bold, black, sans-serif font. The text is enclosed within a blue square frame that has a slight 3D effect, with the top and bottom edges appearing slightly offset from the left and right edges.

**Black Box  
Planning**

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

A solid black rectangular redaction box covers the top portion of the recipient's address.

36 King Street  
Bristol  
BS1 4DZ  
**BlackBoxPlanning.co.uk**

Dear Sirs,

**East Hampshire Local Plan 2021-2040 Issues and Priorities Regulation 18 Part 1 U-U  
November 2022 U**

I write on behalf of my clients, Bewley Homes, Bargate Homes and Cala Homes (Thames), to provide representations to the above referenced consultation. They collectively have interests in land at South Medstead and are working together to promote this as a sustainable location for development, but the comments made at this stage seek to make general observations on the emerging issues. Whilst responses to the consultation questions are provided at Appendix 1, the focus of these Representations is on spatial matters rather than development management considerations. We would welcome further engagement moving forward as the Local Plan progresses.

Preparation of a review of East Hampshire's adopted Local Plan<sup>1</sup> began in 2018. Subsequently, East Hampshire District Council (the Council) took the decision in May 2022 to 'reset' its Local Plan, and the Local Plan is once again at an early stage of preparation. As before, the overriding objective of the emerging Local Plan should be to meet the plan area's development needs in a sustainable way, with growth distributed in accordance with an appropriate spatial strategy.

The Council is consulting on Issues and Priorities for the new Local Plan. The consultation is accompanied by a range of background papers covering Climate Change, Housing Needs and Requirements, Infrastructure, Meeting Accommodation Needs of Gypsies, Travellers and Travelling Showpeople, Settlement Hierarchy and Spatial Development Options. Having reviewed the consultation document as well as the background papers and supporting documents, these representations focus primarily on matters relating to the spatial distribution of growth through the local plan via reference to housing needs, the settlement hierarchy and spatial development options.

That said, the corporate strategies referenced have also been reviewed, including the Place Making Strategy 2019-2036 and Climate and Environment Strategy 2020-2025. Both of which are closely aligned with the objectives of sustainable spatial planning. It is considered that the settlement of Four Marks and South Medstead would benefit from further place making interventions, given the evolution of the settlement in modern times. The holistic approach advocated by my clients for South Medstead would support high quality place making which is a core thread running through a number of the issues raised in the consultation document, such as decarbonisation, delivery of infrastructure and other services and facilities, employment creation reflecting local demands, biodiversity net gains

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<sup>1</sup> The adopted Local Plan comprises Part 1 (the Joint Core Strategy, 2014) and Part 2 (Housing and Employment Allocations, 2016).

and health and well-being. These components are reflected in the consultation, including the development distribution options, but it is not considered that spatial distribution of development is a 'one size fits all' issue within East Hampshire. Different settlements will respond positively, in planning terms, to different scales of growth and the type of growth being promoted. In South Medstead, there will be significant benefits for the wider settlement through the adoption of a holistic approach to strategic expansion. This will underpin the role and function of the settlement and its position within the settlement hierarchy. It will also aid the delivery of an effective 20-minute neighbourhood, a concept we are supportive of. In South Medstead this will have the additional benefit of helping support the vitality and viability of the Local Centre at Lymington Barns, a unique Centre, with potential for future focused growth and regeneration, which is underpinned by local businesses.

The Vision set out is supported. It also advocates a holistic approach to spatial planning, a matter also supported by my clients. In achieving the Vision, the strategic objective of 'A Front Door for Everyone' is also supported. Homes, including affordable homes, are a fundamental part of effective sustainable development. East Hampshire is an unaffordable location and there is a requirement to deliver more homes to achieve this key theme. Sometimes this process is controversial, but it is requested that the LPA continue to engage with a range of stakeholders, including business owners, community groups and sports clubs. Black Box Planning, alongside our clients, would also welcome further engagement moving forward.

### Housing needs

#### ***Commentary on housing needs***

Notwithstanding the recently issued Written Ministerial Statement made on 6 December 2022, in broad terms the use of the standard method to calculate the local housing need method is supported. It is noted the Council have not set out any exceptional circumstances that the Council consider would justify an alternative approach to the use of the standard method.

It is noted, however, that the Council relies upon a contribution of 115dpa from the South Downs National Park (SDNP) for the purposes of calculating the Local Housing Need within EHDC (excluding the SDNP). The figure of 115dpa relies upon on modelling undertaken within the HEDNA and does not pay any consideration to actual delivery rates within the SDNP, nor commitments made by the SDNP through past Statements of Common Ground. It does, however, caveat that the SDNP are in the process of reviewing their own Local Plan.

The Council state that:

*"It is not considered appropriate to continue to apportion local housing need based on a supply response as part of the plan-making process. Housing supply changes on an annual basis as does the inputs to the standard method, resulting in uncertainty around housing numbers. In addition, both EHDC and the SDNPA have both committed to reviewing their adopted Local Plans and it will therefore necessitate increasing supply beyond the 2033 period currently established in the South Downs Local Plan. As a result, the HEDNA (2022) has sought to approach a split between the SDNP and the wider EHDC area by considering whether a different standard method figure exists for each area"*

The Council draws upon this figure of 115 dwellings to generate a housing need for EHDC of 517 dwellings per annum (based upon an objectively assessed need of 632 for East Hampshire as a whole, including the SDNP). This figure of 517 dwellings is used to calculate a housing requirement across the

plan period of 9,823, and a residual requirement for 3,405 over the remaining plan period for which the Council will need to find additional land.

Whilst the Council recognise that further discussions with the SDNPA will be required during the course of the local plan preparation, to determine the objectively assessed need for EHDC with sole reference to the HEDNA modelled outcome is not considered to be sufficiently justified or positively prepared. Such an approach does not pay sufficient regard to prior 2021 and 2018 Statements of Common Ground (SoCG) with the SDNPA, delivery rates within the SDNP (estimated at 96dpa at best in accordance with information published within the 2021 SDNP AMR), relies upon the SDNPA bringing forward a plan that increases supply within East Hampshire during the plan period, and does not pay regard to the socio-economic duty of the SDNPA to foster the wellbeing of local communities, with emphasis on local business and affordable housing, pursuant to its statutory purposes related to natural beauty, wildlife, cultural heritage and special qualities.

The exclusive use of the HEDNA derived data to establish the contribution of the SDNP to East Hampshire Housing Need as a whole, and the lack of consideration of prior delivery rates or commitments by the SDNPA is considered unsound.

The Housing Needs and Requirement Background Paper illustrates the extent to which housing supply in the Council’s planning area has been reliant on completions at the Whitehill & Bordon strategic allocations in recent years. From the base date of the Joint Core Strategy in 2013, 46% of completions have been delivered in the district’s north east sub-area (i.e the sub-area in which Whitehill & Bordon is located), with 31% in the A31 corridor and 23% in the southern parishes. It is clear that as more supply has come on stream at Whitehill & Bordon this balance has tilted further, with 64% of completions in the 2021/22 monitoring period being in the north east, and a further 55% of current commitments also located in the north east. It is acknowledged that headroom for continued growth at Whitehill & Bordon is limited by its proximity to the Wealdon Heath Phase II designated sites, though equally it is clear that a degree of re-balancing of delivery across the Council’s three sub-areas will be required to ensure the benefits of growth are delivered widely.

Settlement hierarchy

**Principle**

The settlement hierarchy background paper proposes a simplified 4-tier hierarchy based on the concept of ‘20-minute neighbourhoods’ to replace the 6-tier iteration presented in the 2019 Local Plan consultation. The 2019 and 2022 iterations are presented side-by-side below for comparison:

2019			2022	
Tier in Hierarchy	Proposed designation	Proposed Settlements	Tier in Hierarchy	Names of Settlement
1	Town	Alton, Whitehill & Bordon	1	Alton, Liphook, Whitehill & Bordon
2	Large Local Service Centre	Liphook, Horndean	2	Clenfield, Four Marks & South Medstead, Grayshott, Horndean
3	Small Local Service Centre	Holyboame, Grayshott, Headley, Rowlands Castle, Clenfield, Four Marks & South Medstead	3	Berley, Berley Station, Berthorpe, Catherington, Headley, Headley Down, Holt Pound, Holyboame, Kingsley, Lindford, Medstead, Passfield Common, Ropley, Ropley Dean, Rowlands Castle
4	Settlement with a Small Number of Services	Lovedean, Lindford, Berley, Kingsley, Medstead, Ropley, Catherington, Headley Down, Arford, Bramshott, Holt Pound	4	Arford, Beech, Griggs Green, Lasham, Lower Froyle, Lovedean, Shalden, Upper Froyle, Upper Weald
5	Rural Settlement	Passfield Common, Ropley Dean, Berley Station, Upper Froyle, Berthorpe, Beech, Griggs Green, Lower Froyle		
6	Other settlements in the countryside	Oakhanger, Shalden, Upper Weald, Lasham		

The principle of a streamlined hierarchy is supported, both as a means of better aligning the spatial strategy with the 2019 declaration of a climate emergency, and on the basis that it offers greater

utility as a tool for informing the development of spatial policies. For example, in practice little policy value was previously derived from the granular level of distinction between the old tier 5 and tier 6 settlements given the similar limited service offer and limited development potential at each, whilst the settlements at tier 3 did not all appear to relate well to one another, with some being closer in character to settlements at tier 2, and others to tier 4.

The simplified structure makes the distinction between tiers more meaningful and has the effect that settlements with comparable service offers – such as Grayshott and Four Marks & South Medstead – are no longer bundled with settlements with a demonstrably smaller level of offer, such as Headley. This in turn enables the relative merits of comparable settlements as locations for future growth to be better understood.

As such, Four Marks emerges as a stand out settlement at which to deliver growth which is aligned with 20-minute neighbourhood principles. First, its services are generally arranged in a linear pattern at the heart of the settlement. Given the correspondingly linear form of the settlement as a whole, there is relatively little settlement depth either side of the central belt of services (i.e. the area broadly stretching from the Boundaries Surgery in the north east to the Mansfield Park Surgery in the west). This means that the village's retail, hospitality, employment and healthcare services are within 1200m of the majority of residential areas. Similarly, the settlement could support strategic future growth which both aligns with and enhances the existing 20-minute neighbourhood, by virtue of available strategic scale land within the identified 20-minute envelope. Such strategic growth would offer significant potential to expand the services on offer in the settlement through the development process, building on and broadening the existing retail offer to enable more needs to be met locally. It could also include provision of additional hospitality services such as a much needed pub, other forms of leisure, complimentary healthcare and consolidate the B-class employment market in the village. With a large proportion of working from home in the area (46%), facilities which support working 'near' home would also make an important contribution and support day to day expenditure retention.

This approach, and the strategic expansion of an existing settlement, building on and delivering a step change in services and facilities, offers the ability to broaden the offer of the settlement, rather than simply replicating services and facilities that you may ordinarily get from a more conventional urban expansion (of a larger settlement), such as a limited line convenience store or a small hall to meet the needs of the development, rather than the wider settlement.

### ***Methodology***

The Settlement Hierarchy Background Paper proposes an exceptional approach to defining a 20-minute neighbourhood in Four Marks & South Medstead compared with other settlements studied. This is because the peripheral location of Medstead Primary School and Four Marks Primary School mean that neither can be captured within a 20-minute envelope of the identified village centre. However, the village centre identified by the Council does not capture the shops and services at Lymington Barns, nor does it capture the committed investment in the provision of five new shops which are under construction. It is noted that at Whitehill & Bordon the Council identify a polycentric 20-minute neighbourhood area, with three non-contiguous service hubs identified. We consider the same principle should apply at Four Marks, and that the cluster of services at Lymington Bottom Road (which includes a greengrocer, butcher, café, hairdresser, medical centre and specialist shops) should be recognised as comprising part of Four Marks' 20-minute neighbourhood, with the buffers re-drawn accordingly.

Additionally, we propose that Medstead Primary School should be de-coupled from the settlement hierarchy geography of Four Marks & South Medstead. This would better reflect the functional geography of the area given that Meadsted Primary 'faces' northwards, serving an irregular catchment comprising the many small rural settlements to its north. The narrow roads connecting Four Marks with Medstead Primary do not have footpaths and are inconsistent with the walking and cycling principles underpinning a 20-minute neighbourhood in any case. If the above changes were made then a more rational 20-minute neighbourhood for Four Marks & South Medstead emerges, with a revised envelope now covering the village centre services, the nearby cluster of services at Lymington Barns Local Centre and Four Marks Primary School.

Alternatively, if the Council is minded to continue its current approach, then on the basis that Four Marks Primary School only falls outside the defined 20-minute neighbourhood because the envelope fails to capture Lymington Barns – i.e. not as a result of its functional relationship with the settlement itself – we consider the full 2 points should be awarded. As such the exception methodology presented at paragraphs 4.2 and 4.3 of the Background Paper is not supported.

Notwithstanding the above, Appendix C of the settlement hierarchy background paper proposes that a primary school within a settlement, but outside the 20-minute neighbourhood, should attract 1 point. However, Appendix D of the background paper appears to overlook Four Marks Primary School as Four Marks & South Medstead scores '0' in relation to primary schools. The overall settlement score should therefore be increased.

Additionally, we consider that Four Marks' settlement hierarchy score overlooks its full range of current services. The score of '0' for youth or social clubs fails to recognise the active Four Marks & Ropley Scout Group, based in a facility next to Four Marks recreation ground. The methodology does not define youth or social clubs, but scouting clearly meets any reasonable definition.

Therefore, the Four Marks & South Medstead score at Appendix D of the background paper should, at a minimum, be revised upward from 19 to 21. However, for the reasons given above we consider that Four Marks Primary School should be judged to fall within the 20-minute envelope, which would increase the settlement's overall baseline score to 22 points.

As a general point, we consider that a further weakness in the methodology is that whilst supermarkets attract 2 points, provision of the same range of goods via a cluster of small or independent retailers is not recognised. At Four Marks, the village centre includes a bakery, pharmacist, off license and florist plus Co-op supermarket and smaller convenience shops in a tight cluster. The additional Centre at Lymington Barns also includes a large butcher, delicatessen and greengrocer, with potential to enhance this offer significantly through the development process via strategic growth north of the Watercress Line. Collectively, a supermarket level of offer is provided, with the additional advantage that small and independent shops support community vitality, as sought by NPPF paragraph 86. In our view, the methodology should recognise the equivalence with supermarket provision and score accordingly. The sustainability benefits of supermarkets, as a destination, are also being eroded by the extent of Special Forms of Trading (SfT), in the form of online shopping. The inclusion of click and collect hubs in the planning of new development will help deliver positive effects by reducing individual trips.

### ***Potential to deliver new services through future strategic growth***

Separately, there is also a need to consider how a settlement's 20-minute neighbourhood credentials could be enhanced by additional services and facilities delivered through strategic development. The

most important consideration here, and one often overlooked, is the extent to which strategic development can enhance a settlement's overall self-containment by broadening and deepening its existing service offer. A strategy predicated on 20-minute neighbourhoods should explicitly bring forward growth which achieves this goal. It would be a missed opportunity to deliver strategic scale growth which simply 'washes its own face' and provides limited convenience retail, leaving other needs unmet within the settlement.

To this end, strategic growth at Four Marks & South Medstead would offer a clear opportunity to enhance self-containment and consolidate a vibrant 20-minute neighbourhood in the settlement through a transformed retail and leisure offer, a new centrally-located primary school, a new pub, further healthcare provision (complimentary to the existing surgery) and a substantial increase in total service users within walking and cycling distance of all new and existing village services. In particular, strategic growth on land north of the Watercress Line would deliver a critical mass of demand for the village centres due to its proximity and connectivity, whereas growth to the south of the settlement would likely function as more detached and separate, with local needs likely met through further convenience style shopping alone as a result. Such development would not be consistent with a 20-minute neighbourhood philosophy and should be avoided where opportunities better aligned with a sustainability-led spatial strategy are available.

### ***Settlement hierarchy as a starting point only***

It is important for spatial policy development that the settlement hierarchy is viewed through the lens of the district's constraints and used only as a starting point for considering suitable locations for future growth. This is because in isolation, the settlement hierarchy is simply a snapshot of current and near-future services and facilities, not a complete proxy for development potential. In other words, the settlement hierarchy is not a reliable indicator of the extent to which services can be leveraged to support future growth.

For example, whilst Grayshott and Four Marks & South Medstead return very similar scores via the settlement hierarchy methodology, it is apparent they support contrasting degrees of development potential once environmental constraints and land supply are considered. Appendix B of the 2022 Habitats Regulation Assessment (HRA) which accompanies the consultation document is clear that Grayshott, along with the other north eastern settlements, lies within the core recreational catchments of the Wealdon Heath Phase II complex and the Solent European sites. It is technically possible to mitigate recreational impacts on designated sites to an extent via site-specific and strategic Suitable Alternative Natural Greenspace (SANG). However, in practice this is a complex and imprecise process, constrained both by the practical limitations of land supply to deliver SANG and the inherent unpredictability of human behaviour.

By contrast, the HRA confirms the north-western sub-area (i.e. the A31 corridor) is unaffected by constraints in relation to recreational pressure due to its greater distance from the designated sites and their catchments. It is recognised that the HRA identifies sensitivity in relation to nutrient neutrality in the north-west/A31 corridor, specifically with regard to the River Itchen SAC. However, important distinctions can be drawn between the practical impact from recreational pressure and from nutrients neutrality on the distribution of growth. As noted, mitigation for recreational pressure is inherently reliant upon behavioural factors, whereas mitigation for nutrient runoffs can be delivered entirely through technical solutions, both on and off site. As such, whilst the on-paper nutrient neutrality sensitivity at Four Marks is noted, this does not represent a practical constraint to growth coming forward. Strategic growth at Four Marks & South Medstead would likely fall right on the edge

of the River Itchen catchment, based on current catchment mapping. Therefore, there would be good potential to ensure that foul and surface water drains out of catchment for treatment, avoiding impacts on the River Itchen entirely. Furthermore, delivering this mitigation through the strategic development process would enable a net benefit to overall nutrient flows, as existing flows could also be taken out of catchment via new drainage infrastructure. The potential for overall net benefits to nutrient neutrality is therefore a key in-principle benefit from growth at Four Marks & South Medstead. We consider that strategic growth in the north-east catchment would not yield an equivalent benefit to recreational pressure on European sites.

### **Spatial Development Options**

The Regulation 18 Local Plan considers four spatial development options – dispersal, concentration within the largest settlement, apportionment by population, or a new settlement of ‘over 1,500 new homes’ – with the need to find additional land for a minimum of 3,405 new dwellings by 2040. This Representation does not consider the minimum housing requirement, having regard to existing commitments and deliverable supply, at this stage. Accordingly, comments are presented in light of the figures provided in the consultation.

#### ***Option 1 and 2: Dispersal and Concentration within the largest settlements***

The options for dispersal or concentration within the largest settlements are supported in principle, with the important caveat that the sustainable benefits which can be derived from principles such as the 20-minute neighbourhood, as set out above, are not necessarily applicable in equal measure to all of the largest settlements.

It is, however, noted that the Council are currently reliant upon completions at the Whitehill & Bordon strategic allocations in the delivery of its housing supply. 64% of completions in the 2021/22 monitoring period were delivered in the north east sub area (i.e. the area where Whitehill and Bordon is located), and 55% of current commitments also located in the north east. Given such an existing reliance on Whitehill & Bordon to deliver the districts housing need, further deliverability at this settlement is subject to a number of constraints. The proximity of locally, nationally and internationally designated sites to the settlement of Whitehill and Bordon is noted, alongside the immediate boundary with the SDNP. It is noted that Natural England raised concerns regarding the impact of significant further development at Whitehill and Bordon upon existing SANG and the ability to provide further effective provision sufficient to offset the impacts on the SPA, as is necessary to satisfy the Habitat Regulations. It is considered therefore that there is limited SANG capacity at Whitehill and Bordon for further development, and such limited capacity would result in additional allocations at sustainable Tier 1 and Tier 2 settlements within the district, including settlements such as Four Marks.

#### ***Option 3: Apportionment by population***

The option to distribute development by population across each of the three sub areas is not supported. Such an approach pays no regard to the spatial circumstances of developable land within each of these sub areas. Particular reference in this instance is given to the southern parishes, which operate under substantial constraints due to the existing consented development, biodiversity, conservation and flood risk, alongside the immediate presence of the South Downs National Park both restricting potential available land and additional potentially impacted by further development in this

location. The potential capacity of Whitehill and Bordon, located within the 'north east' sub area, has been previously noted, and it considered therefore that development apportioned by population within this sub-area would additionally pay little regard to deliverability, placing substantial reliance on delivering new development and Liphook, itself subject to ecological constraints as well as the SDNP.

Such an approach is considered to be at significant risk of being unable to identify deliverable sites, and an evidence base reliant on existing population alone without consideration of other planning constraints would not be considered to be sufficiently justified. The option to apportion development by population is not considered to be consistent with sustainable development, justified, nor consistent with national policy. Such an approach is unsound.

#### ***Option 4: New settlement***

Regarding any proposed new settlement, and notwithstanding the potential deliverability or sustainability of such a settlement, it is noted that the Local Plan sets out the need for 3,405 new dwellings, and identifies the option for a potential new settlement of 'over 1500 new homes' to be delivered within the District boundaries.

Based on the statement of 'over 1500 dwellings', it is clear that any new settlement is highly unlikely to meet the District's full identified housing needs. In the event that a new settlement is identified as the preferred option, further strategic allocations will therefore be required across the District, at sustainable settlements such as Four Marks & South Medstead.

It is further noted that, in the event the Council were to identify a new settlement as the preferred option, any new settlement is unlikely to be completed during the plan period, with housing delivery from such a settlement predominantly delivered towards the end of the plan period. As set out in Paragraph 73 in the NPPF, any allocation of a new settlement needs to make a realistic assessment of likely rates of delivery, given lead in times for large scale sites. Sites of between 1500-1,999 new dwellings take, on average, 5.3 years to secure planning permission, and a further 1.7 years to deliver the first dwelling, with build out rates from that point of approximately 120 dwellings per annum (dpa). Across the 19 year plan period therefore, this would equate to approximately 1,440 dwellings being delivered for any new settlement in excess of 1500 dwellings, from year seven onwards. This further underscores the need for sustainable development at sustainable settlements to both meet identified housing need and to deliver necessary housing during the full plan period.

The identification of a new settlement was considered at length in the previous Regulation 18 consultation undertaken by East Hampshire District Council. A proposed new settlement at Northbrook Park was identified and subsequently discounted, with the sustainability appraisal noting that Northbrook Park was "among the weakest options across a range of both environmental and socio-economic themes". The evidence base and appraisal undertaken in the search for a new settlement in the previous Local Plan Consultation is significant, and the identification of a lack of soundness for a proposed new settlement is, in broad terms, unresponsive of this option being taken forward as preferred.

The provision of a new settlement will also undermine sustainable development objectives and opportunities to decarbonise, because it will have to be realistic about self-containment. An isolated or detached catchment of only 1500 homes is unlikely to support the vitality or viability of anything meaningful, placing additional travel demands on most of the resident population. It will be much more effective to deliver largescale development which can be integrated with an existing settlement,

benefitting both new and existing residents, to build a critical mass of services and facilities, facilitated by the development itself. It is considered that the Local Plan and the associated spatial strategy should be used in a positive way to achieve such benefits. This also includes proportionate economic and social infrastructure growth alongside housing delivery. Strategic development at South Medstead provides a unique opportunity for community expansion and positive change and, whilst delivering housing supported by a number of leading housebuilders, is not just about housing delivery but placemaking.

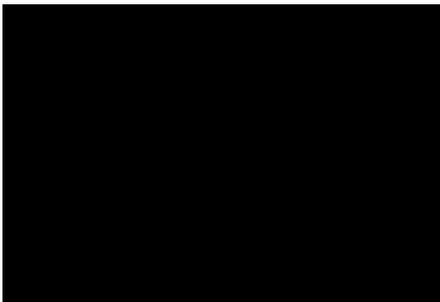
The Options Appraisal Background Paper sets out in the Summary to Option 4 that:

*'The underlying reason for concentrating development in a new settlement is that it could enable new infrastructure, services and facilities to be development 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.'*

These objectives are also achievable as part of the planned strategic expansion of South Medstead.

We look forward to engaging further with the Council throughout the plan making process.

Yours sincerely



## **Appendix 1:**

### **Consultation Questions**

The Consultation Questions, set out below, should be read alongside the accompanying Representation. Responses, are provided in brief in red. It should also be noted that the Representations focus on the spatial context of the issues raised rather than detailed development matters at this stage. Bewley, Bargate and Cala Homes (Thames) would welcome further engagement as policy matters evolve and the Local Plan progresses.

**Issues:**

- The Climate Emergency
- Population and Housing
- Types of Housing Needs
- Environment
- Infrastructure
- Development Strategy and Spatial Distribution

**The Vision**

**VIS1** How do you feel about this vision? (very happy / happy / neutral / unhappy / very unhappy) **The progression of an ambitious, but achievable Vision is supported. The wording of the Vision is also supported. Please see accompanying Representation for further detail.**

**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 headline principally covers qualitative issues, which are supported. Previous themes such as 'a front door for everyone' should also be included to help contextualise the extent of development required to help rebalance the housing crisis in the District. This forms the key area of consideration. However, that said, the manner in which the Vision presents how that will be achieved is supported, as set out above.**

**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. **Please see accompanying Representations for further consideration. The Local Plan should be evidence base led and objective in its assessment of what can be achieved through the delivery of development. Not all locations are equal in this context and not all proposals are equal in how this can be achieved. A spatial distribution of development will be required as the plan progresses, but informed by the evidence.**

**Climate emergency:**

**CLIM1** Do you agree that new development should avoid any net increase in greenhouse gas emissions, wherever practicable? (Y/N) **Yes.**

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

in order of importance). **No comment at this time.**

What you told us...	Rank
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	

**CLIM 3** Do you agree that the Council should define ‘net-zero carbon development’ in this way? (Y/N). **No comment at this time.**

**CLIM3a** 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? (Y/N) **No comment at this time.**

**CLIM4a** If you answered ‘no’, how should we balance the design of new buildings with the need to tackle climate change? **n/a**

**CLIM5** Should the detailed criteria for tackling climate change be specified in any of the following: **No comment at this time.**

	Yes?	No?
In the emerging East Hampshire Local Plan		
In future neighbourhood plans		
In local design codes		

**CLIM5a** Please explain your answer. **n/a**

**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). **No comment at this time.**

**CLIM6a** Please explain your response. **n/a**

-----

### **Population and Housing:**

**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.

The option of pursuing exceptional circumstances to devise an alternative housing requirement is not an objective approach which reflects socio-economic considerations. East Hampshire is in the midst of a housing crisis, with worsening affordability rates making a new home unaffordable to many. Whilst the SDNP may increase the requirement on other settlements within the District to accommodate a slightly more development, this is achievable and a number of the locations have few constraints to enable the need to be met.

**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). **Yes.**

**POP2a** Please explain your answer. The Council's own evidence indicates that the housing requirement for the District as a whole is 632dpa. This is the starting point to consider housing numbers to be planned for within the Local Plan Review. The apportionment with the SDNP should be informed in detail with the realistic delivery of home in the National Park. That is currently 115dpa, which results in the 517dpa in the area outside of the NP. However, it is considered that 115dpa significantly overstates the likely supply of new homes in the NP. The most recent SoCG identifies a housing trajectory of closer to 25dpa from 2027. This is a more realistic contribution given the relative constraints which exist, the focus on community and affordable housing led development. Furthermore, it is considered that the District should also be cognisant of the duty to meet unmet needs arising from other areas. Whilst the formal Duty to Co-operate is the subject of ongoing debate, it remains a component of policy and should be regarded. This may have the implication of further incorporating some additional growth from neighbouring authorities.

**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. It is unlikely to be feasible or proportionate for the Council to meet all the housing need of East Hampshire's part of the SDNPA. However, it would clearly be inconsistent with the statutory Duty to Cooperate to unilaterally decide at the start of the plan making process that no effort will be made to explore ways in which to meet any of the SDNPA's needs. Logically therefore, it is appropriate that the Council explore the potential of meeting some of the SDNPA's needs, including through Duty to Cooperate dialogue. The extent of unmet need, as set out above is likely to be greater than the provision currently included within the HEDNA.

**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. As a starting point, it would be good practice to engage with neighbouring authorities on the question of unmet needs at an early point in the plan making process. Until those discussions are well progressed it would be premature to assume that unmet needs cannot be planned for.

**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

**No comment at this time.**

**HOU1a** Please explain your reasons. *n/a*

**HOU2** Is there anything else that should be included in this policy? **No comment at this time.**

**HOU3** Should the Local Plan include a specific policy on adaptable housing? (Y/N)  
**No comment at this time.**

**HOU4** Should there be a requirement on large sites for a percentage of new homes to be adaptable?(Y/N) **No comment at this time.**

**HOU4a** Please explain your answer. **n/a**

**HOU5** Should the Local Plan include a policy to specify the percentage of smaller homes on development sites? (Y/N) **No comment at this time.**

**HOU5a** If yes, should this percentage focus on: **n/a**

- 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)

**No comment at this time.**

**HOU6a** Please explain your answer. **n/a**

**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)

**No comment at this time. This is a matter which will be tested through the emerging evidence base. Affordable housing provides an important component of wider housing needs.**

**HOU7a** Please explain your answer. **n/a**

**HOU8** Are there any other forms of housing that the Local Plan should refer to? (Y/N) **No comment at this time.**

**HOU8a** If yes, please state what other forms of housing. **n/a**

-----

**Environment:**

**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;
- Protecting the most vulnerable existing protected habitats and species;
- Conserving the character of rural landscapes;
- Creating better natural links between existing habitats.

No comment at this time.

-----

**Infrastructure:**

**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.

No comment at this time.

**INF2** How do you feel about the allocation of CIL funds to date? (Very happy / Happy / Neutral / Unhappy / Very unhappy). No comment at this time.

**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. No comment at this time.

**INF3a** Please explain your answer. n/a

-----

**Development Strategy and Spatial Distribution:**

**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

Please see accompanying Representations for further detail. Options 1 and 2 are most likely to enable the delivery of a forms of development which reflect key sustainability principles being advanced, such as the concept of a 20minute neighbourhood. The form and quantum of development in this context should be considered alongside a mix and form of development which would help achieve that, including supporting employment, services and infrastructure. Not all locations are equal in this context and therefore development proposals and provisions should be considered on a more granular basis.

In light of the above, and the supporting Representation, Option 3, as a principle does not promote the qualitative considerations necessary to support the most sustainable spatial distribution of development. It neglects concepts such as, locating larger scale development in settlements other than the largest in the District because of the role it can play in enhancing the relative sustainability of that settlement. Nor does it recognise that that not all locations around the largest settlements are sustainable in the context of a 20 minute neighbourhood or similar.

Option 4 is not considered to be an appropriate option for the District in planning terms. See accompanying Representation.

**DEV2** Why have you ranked the options in this way? (Please give reasons for your chosen ranking) **see above**

**DEV3** Are there any alternative options we should consider? (Y/N)

The role and function of development in delivering supporting infrastructure, services and facilities, will make important contributions and an effective approach to placemaking. This may include the provision of new primary schools, employment, green infrastructure, sporting facilities, shops and healthcare facilities. The focus on housing, is understandable but further attention should be given to the creation of mixed, vital and viable communities. This aid new development playing a role in enhancing community credentials which already exist and substantiating their role in the settlement hierarchy.

**DEV3a** If yes, please explain.

See above and the accompanying Representation.

-----

**General consultation questions:**

**GEN1** How do you feel about this consultation? (Very happy / Happy / Neutral /

Unhappy / Very unhappy). **No comment at this time.**

**GEN2** Is there anything else you would like to tell us in response to this consultation? (please explain). **No comment at this time.**



# METIS HOMES

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

## By email only

Dear Sir / Madam

Metis Homes Ltd welcomes the opportunity to submit written representations in response to East Hampshire District Council's (EHDC) current consultation on its **East Hampshire Local Plan 2021-2040 'Issues and Priorities Regulation 18 – Part 1'**. These written representations respond to the questions contained within the consultation document that are most relevant to the site known as Windmill House, Alton, as set out below.

### About Metis

Metis Homes is an independent, privately-owned housebuilder based in Hampshire, with significant experience in delivering considered, high-quality developments across the South of England.

Metis has won multiple awards as a testament to its core values, including being a double winner of the ultimate industry accolade, Best Small Housebuilder at the WhatHouse? Awards. At Metis, we take a consultation led approach to every site, which is based around high quality individually designed homes and never employ standard house types.

### Background

Windmill House, Alton has been promoted for residential development through previous drafts of the emerging Local Plan, including as part of the previous Regulation 18 consultation in early 2019.

The site has been considered in historic and recent Land Availability Assessments under reference LAA/AL-019, measuring 2.96 ha and has the potential to deliver up to 50 dwellings at a density reflective of the site's location adjacent to the settlement boundary of Alton, identified as a large settlement within the district. To date the site has been promoted by agents acting on behalf of the landowner and Metis Homes are currently in advanced discussions with the owners to become the delivery partner for the site. It is our view that the site is demonstrably available, achievable and developable with a timescale of 0-5 years.

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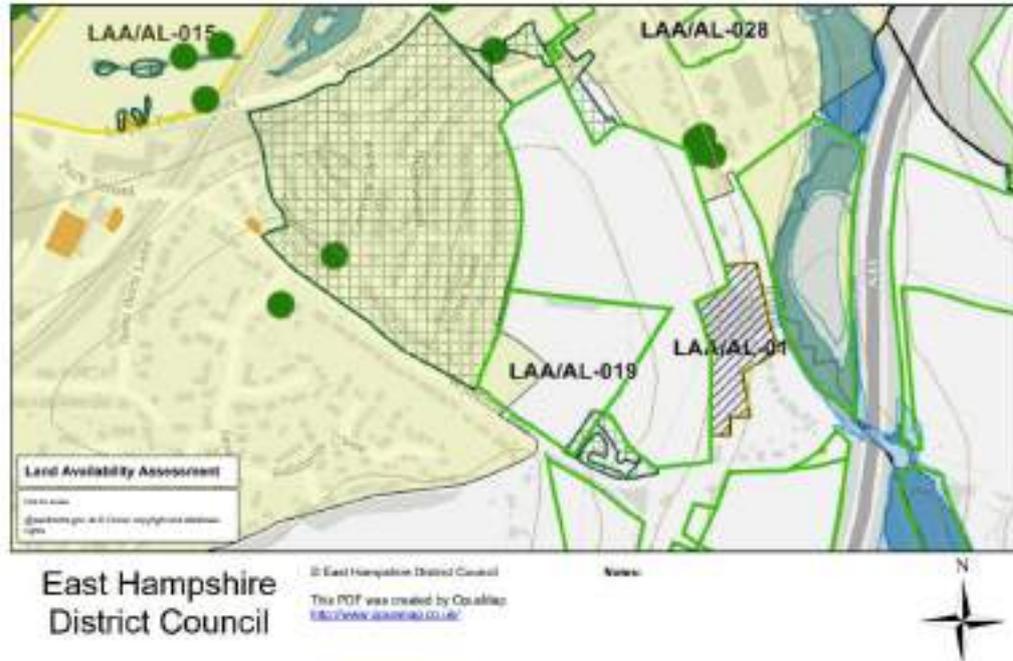
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The previous draft local plan consultation (September 2021) feature four reasonable housing distribution option. Of the four Options, Option 2 had officer recommendation as the preferred option. All four spatial distribution options featured Windmill House. We are therefore of the view that this site offers a tangible and sensible allocation prospect which would represent a logical extension to the settlement with minimal landscape and visual impact.

## **Climate Change Emergency (including comments on Settlement Hierarchy Background Paper)**

- **CLIM6: How do you feel above using the idea of living locally to influence the location of new homes? (Very happy/Happy/Neutral/Unhappy/Very unhappy)?**  
Very Happy.
- **CLIM6a: Please explain your response.** See below.

The revised Settlement Hierarchy Background Paper (2022), published alongside the emerging local plan, places great emphasis on the 20-minute neighbourhood concept which





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aims to meet the day to day needs of existing and future housing development within a 20 minutes' walk or 1,200m as the crow flies.

Metis Homes supports the Council's approach as this offers an ideal opportunity to deliver development that is more sustainable and provides for additional population within existing settlements to maintain and support existing services. We equally support the identification of Alton as a main settlement which is reflective of the plethora of services and employment opportunities available to support existing and future housing development.

Windmill House is located well within the 1,200 metres of Alton town centre and is within a similar distance to employment areas. We are therefore of the view that the site is situated in a highly sustainable location and is capable of helping meet the Council's aspirations for 20-minute neighbourhoods.

## Development Strategy and Spatial Distribution (including comments on Spatial Development Options Background Paper)

- **DEV1 Please rank these options in order of preference.** See table below.

Order of preferred ranking	EHDC suggested option
1	Option 2: Concentrate new development in the largest settlements
2	Option 3: Distribute new development by population
3	Option 1: Disperse new development to a wider range of settlements
4	Option 4: Concentrate new development in a new settlement

- **DEV2 Why have you ranked the options in this way? (Please give reasons for your chosen ranking).** See below.

**Option 2 should be the preferred option as it would** direct development to the largest settlements which benefit from a wider range of services and facilities. This would in turn potentially improve the prospects of delivering the 20-minute neighbourhood concept. In addition, the range of employment provision, services and facilities in the largest settlements

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are significant drivers for demands and as such providing for much needed homes where the demand would be greatest would have the added of having the lowest carbon footprint for the Development Strategy and Spatial Distribution of new dwellings across the District.

For consistency, the identification of sites for new housing in each of the identified settlements should also be carefully considered on the basis of the Council's '20-minute neighbourhood approach', with priority given to those sites which are closest to existing services and facilities. Equally the development potential of sites within 20-minute neighbourhoods should be assessed to ensure the most effective use of land in order to maximise the benefits of the council's approach. For example the current Land Availability Assessment assesses the development potential of Windmill house as 15 dwellings representing a density of 5 dwellings per hectare. In our view, a sensitively designed scheme of up to 50 dwellings represent a modest density of 17 dwellings per hectare could be accommodated on the site. This would be more in keeping with the suburban setting whilst making effective use of land.

Furthermore, the approach proposed by Option 2 is the most consistent with the previous work completed in preparing the previous Regulation 18 Local Plan for consultation in early 2019 and the subsequent draft Spatial Strategy Preferred Option paper published in late 2021. We are therefore of the view that this previous work provides a sound and robust starting point for identifying the preferred option for the Development Strategy and spatial distribution of new housing in the emerging Local Plan.

**Option 3** is highly likely to correlate with Option 2 by virtue of Option 2 directing development to the largest settlements where there are likely to be bigger populations by comparison.

**Option 1** has the potential to support existing services in lower order settlement through the provision of modest housing development. Notwithstanding this benefit, lower order settlements are disproportionately likely to be affected by landscape and biodiversity issues. It is therefore our view that while Option 1 has potential benefits, when viewed in a wider context it would be less beneficial in comparison to Option 2 and Option 3.

**Option 4** is the least favoured in our assessment due to the delays associated with largescale development and their significant localised impacts. This is notwithstanding the potential public benefits offers be the delivery of infrastructure in tandem with largescale sites. There is also the risk that new populations will need to travel to higher order settlements where there are additional facilities thereby increasing dependence on car travel. Furthermore in order to underpin delivery the council would need to allocated a selection of small to medium scale sites.

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## Conclusion

Our submission has demonstrated the suitability and deliverability of Windmill House for allocation in accordance with the majority of the Council's spatial distribution options. Metis Homes would welcome the opportunity to discuss Windmill House with officers and to provide any further evidence or information which would aid discussions. We trust the above comments are helpful and will be taken into consideration when a preferred spatial strategy for the distribution of new development across the District is identified. In this regard, please do not hesitate to contact the Land and Planning team at [land@metishomes.co.uk](mailto:land@metishomes.co.uk) or on 01962 893 542 as required.

Yours sincerely

**For Metis Homes Limited**



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Town and Country Planning Act 1990 (As Amended)

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# East Hampshire Local Plan Review

*Regulation 18 Consultation Part 1: Issues and Priorities*

On behalf of:

**Robert Camping**

January 2023 V 1.1 ISSUE



## Contents

<b>1.</b>	<b>Introduction.....</b>	<b>1</b>
<b>2.</b>	<b>Representations to the Key Issues and Priorities.....</b>	<b>1</b>
	<b><i>i. Population and Housing.....</i></b>	<b><i>1</i></b>
	POP1 How do you think we should proceed? .....	1
	POP1a Please explain your answer .....	1
	<b><i>ii. Types of Housing.....</i></b>	<b><i>2</i></b>
	HOU8 Are there any other forms of housing that the Local Plan should refer to?.....	2
	HOU8a If yes, please state what other forms of housing.....	2
	<b><i>iii. Development Strategy and Spatial Distribution.....</i></b>	<b><i>2</i></b>
	DEV1 Please rank the options in order of preference .....	2
	DEV2 Why have you ranked the options in this way? .....	2
<b>3.</b>	<b>Site-Specific Representations: Land West of School Lane, Bentley .....</b>	<b>3</b>
	<b><i>i. Site and Local Context.....</i></b>	<b><i>4</i></b>
	<b><i>ii. Technical Summaries .....</i></b>	<b><i>5</i></b>
	Landscape .....	5
	Flood Risk and Drainage.....	5
	<i>Flood Risk</i> .....	5
	<i>Drainage</i> .....	5
	Ecology.....	6
	Arboriculture .....	6
	Transport and Highways .....	6
	Archaeology .....	7
	<b><i>iii. Summary .....</i></b>	<b><i>7</i></b>

## List of Figures

Figure 1: Site Location Plan .....	4
------------------------------------	---

## 1. Introduction

- 1.1 Neame Sutton Limited, Chartered Town Planners, has been instructed by Robert Camping to prepare representations to the Issues and Priorities Regulation 18 Part 1 consultation of the East Hampshire Local Plan 2021-2040 (herein referred to as the Issues and Priorities Plan).
- 1.2 This draft Plan does not include any preferred planning policies or proposals and simply identifies the options available in addressing the key issues in East Hampshire District over the course of the Plan Period (2021-2040), to inform the Regulation 18 Part 2 version of the Local Plan, which will include the development strategy, allocate sites, and set out the draft policies.
- 1.3 These representations address the options presented and introduce Robert Camping's promotion site, land west of School Lane, as suitable for allocation for residential development to help meet the housing needs of East Hampshire District.

## 2. Representations to the Key Issues and Priorities

- 2.1 Representations are made to the following questions:

- Population and Housing
- Types of Housing
- Development Strategy and Spatial Distribution

### i. **Population and Housing**

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

- 2.2 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.

#### POP1a Please explain your answer

- 2.3 The starting point in establishing the housing requirement for the district is the Government's Standard Method (NPPF, para.61). The NPPG confirms that the Standard Method is a minimum figure, which does not predict the impact of future Government policies, changing economic circumstances or other influencing factors may have on demographic behaviour (Paragraph 010 Reference ID: 2a-010-20190220). For example, where an authority will be meeting unmet need from a neighbouring authority, in this case, unmet need from the South Downs National Park Authority (SDNPA).
- 2.4 It is important that the Council recognises that the Standard Method Local Housing Need Figure (LHN) is just the starting point for establishing housing need, and all other relevant factors must be assessed, and an adjustment made, particularly where these factors indicate an upward direction to the LHN. This assessment then establishes the minimum housing requirement for the Plan going forward. The relevant factors include, but are not limited to:
  - Affordability in the district
  - Affordable housing need
  - The past performance of the district in terms of housing delivery
  - The current housing delivery test result and housing land supply position
  - Unmet need arising from neighbouring authorities

- The need for and/or size of an appropriate buffer
- The spatial development strategy and the size and type of sites to be allocated, together with the subsequent lead times and infrastructure requirements

2.5 These factors must be considered early in the Plan making stages to ensure that the Council is able to proceed with a draft Plan that identifies an accurate level of housing to meet the need of the residents in the district.

## ii. Types of Housing

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

2.6 Yes, self-build and custom-build housing.

### HOU8a If yes, please state what other forms of housing

2.7 The Self-build and Custom Housebuilding Act 2015 was approved to place a duty on the local planning authority (LPA) to keep a register of individuals who wish to purchase serviced plots for self-build and custom housebuilding projects and to account for these registers in their planning decisions. This is in line with the Government's manifesto (2015) to double the number of custom and self-build homes by 2020, as part of their agenda to significantly boost the supply of housing.

2.8 The Housing and Planning Act 2016 inserted a legal duty on the LPA to provide suitable development permission in respect of serviced plots to meet the demand for self-build and custom housebuilding in the area arising in each base period. The Act confirms that the demand for self-build and custom housebuilding arising in an area is the demand as evidenced by the number of entries added to the register kept by the LPA.

2.9 The Act places a legal duty on the Council to grant planning permission or permission in principle within a base period of twelve months, from 31 October, which is when the Act came into force, and any subsequent additions to the register in the following base year. The AMR (2020/2021) confirms that between 1 April 2020 and 31 March 2021, permission for nineteen self-build homes was granted (identified through CIL exemption).

2.10 This is supported by Paragraph 60 of the NPPF, which states that the Council should deliver a wide range of homes to meet the needs of different groups with specific housing requirements, including those that want to build their own home.

2.11 It is noted that the Council does not appear to have a clear local initiative that will enable the scale of delivery of self- and custom-build plots required.

## iii. Development Strategy and Spatial Distribution

### DEV1 Please rank the options in order of preference

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

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

2.12 Robert Camping considers that a hybrid approach of two options should be considered:

- 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 3: Distribute new development by population. Housing growth should be distributed in proportion to the existing population levels.

- 2.13 The advantage of the wider distribution of housing extends beyond reducing transport-related greenhouse gas emissions, as set out in the Spatial Development Background Paper. Wider distribution of housing sites prevents an overreliance on one or two, large, strategic sites, allowing a more even and reliable source of housing delivery even in the early years of the Plan Period. The Council has experienced this problem in the context of the adopted Joint Core Strategy, which remains an issue at the time of preparing these representations, as demonstrated by the current lack of five-year housing land supply.
- 2.14 This wider distribution amongst settlements in combination with the proportionate allocation of housing by population, which is reasonably evenly split across the three planning areas (northwest, northeast and south), the larger population being in the northeast, could allocate small to medium housing sites to areas that can accommodate growth.
- 2.15 Bentley presents an opportunity to deliver a medium size, residential development, taking advantage of the good level of local services and public transport. It is noted that the revised Settlement Hierarchy is proposing to include Bentley as a Tier 3 settlement in contrast to the adopted position of Level 4. The Council, therefore, consider Bentley a sustainable location for accommodating a moderate amount of growth.
- 2.16 In this context, the site land west of School Lane, Bentley, offers the potential for early delivery of a sustainable, residential development, as part of the Local Plan review.

### **3. Site-Specific Representations: Land West of School Lane, Bentley**

- 3.1 This section introduces the site-specific promotion of land west of School Lane, Bentley (herein referred to as the promotion site). The site location plan and indicative masterplan, for up to 34 new homes, is included in Appendix A. The masterplan has been informed by comprehensive landscape and highways advice, as well as the results of the necessary technical studies, which demonstrate that there are no overriding constraints to the residential development of the site.



**Figure 1: Site Location Plan**

3.2 The following subsections summarise the promotion site and accompanying technical reports (Appendix B) to assist Officers of the Council in their assessment of the promotion site as a suitable location for accommodating housing, as part of the preparation of the Local Plan Review.

**i. Site and Local Context**

3.3 The site is to the northeast of Bentley, Farnham, outside of the settlement boundary, but within the designated area covered by the Bentley Neighbourhood Plan. The site lies within the 5-7km risk zone for recreational disturbance of the Thames Basin Heaths Special Protection Area (TBH SPA) and the Bentley Conservation Area lies to the south of the settlement.

3.4 The site, itself, is an area of open grassland with a footpath (017/30/2) running north to south, along the western boundary. On the other side of the footpath and mature tree and hedge boundary, lies a field, large residential properties, and thick tree belt, with a small cluster of trees under a Group Tree Protection Order. The site is bounded by residential properties and School Lane to the east, Hole Lane and scattered residential development to the north, and residential development and Eggars Field to the south. There are two listed buildings within the vicinity of the site, the Grade II listed Jenkyn Place to the northwest and the Grade II\* listed St Mary's Church to the north.

3.5 Bentley is identified as a Level 4 Other Settlement in the settlement hierarchy of the adopted Local Plan (2014), which has a small range of local services and is appropriate for some further small-scale development. As set out above, the Council intends to raise the settlement to Tier 3 in recognition of the current sustainability credentials.

3.6 Bentley is reasonably well served by public transport with two bus stops to the south of the site on London Road. Route 206 runs approximately every two hours on Tuesdays and Fridays to Binstead, Alton and Upper Froyle. The Route 65 bus runs approximately every half an hour to Alton and Guildford. The Bentley railway station is approximately 1.5 miles to the south of the site and provides a direct link to London Waterloo and Alton.

3.7 The site is well related to the settlement boundary and forms a natural extension to Bentley.

## ii. Technical Summaries

### Landscape

- 3.8 SLR has prepared a Landscape and Visual Appraisal (LVA), which is based on the illustrative masterplan prepared by Re-Format. SLR has been integral to informing and shaping the layout, ensuring a landscape led approach.
- 3.9 The site is not within any national designations for valued landscapes, such as AONBs or National Parks. However, the South Downs National Park is located within 1.4km of the site. Footpath 30 extends along the western boundary of the site and St Swithun's Way Long Distance Route extends along the northern boundary. The assessment of potential effects on landscape character identified a major/moderate and negative level of effect on the gently sloping, semi-enclosed pastoral field. The level of landscape effect on all other landscape qualities are identified as moderate or below.
- 3.10 The potential effects on landscape character will be localised, with minor levels of effect on the overall character of the area. The nature of effect on existing vegetation (hedgerow, trees and woodland network) would be positive. In relation to visual effects, the level of visual enclosure provided by existing vegetation and the undulating landform results in no views available from five of the eleven representative viewpoints photographed, including those from the South Downs National Park.

### Flood Risk and Drainage

#### *Flood Risk*

- 3.11 The FRA, prepared by RGP, considers the potential flood risk on the site from all sources.
- 3.12 The site is in Flood Zone 1 and the SuDS features proposed are permeable paving and an attenuation pond. All surface water and roof runoff will be discharged through these SuDS features, which have been sized to accommodate up to, and including, the 1:100 year + 40% for climate rainfall event, into the existing Thames Water surface water network at a reduced discharge rate of 3.7l/s. This minimises the risk of offsite flooding to the surrounding area.
- 3.13 The proposed foul discharge will connect into the Thames Water foul network, which runs along School Lane at manhole 7301 (34 dwellings at 1.7l/s). These discharge rates have been agreed with Thames Water. Based on the information collated as part of the FRA, the proposed development flood risk from all sources has been assessed as low. The area of the site to be developed is in Flood Zone 1 and the assessment of the potential future flooding of the site, illustrates that this will be maintained in the future.
- 3.14 The overall conclusion of the FRA is that there are no flood risk constraints on the site to prevent development.

#### *Drainage*

- 3.15 The proposed surface water drainage system will collect surface water runoff via a combination of permeable paving and gullies, to an underground drainage system, which will discharge to an attenuation pond located to the southeast of the site. The attenuation pond is sized to approximately 567m<sup>3</sup> of attenuation volume, which will accommodate surface water runoff for storm events up to and including the 1:100 year + 40% for climate change rainfall event, based on a discharge rate of 3.7l/s. The pond will discharge water by means of a flow control chamber to a new Thames Water surface water sewer, requisitioned along School Lane.

- 3.16 The attenuation pond will be a 'wet pond', which means that there will be a pool of water at the bottom. This wet pond will provide added biodiversity and amenity enhancements, by providing a habitat area for both fauna and flora to thrive, whilst allowing the settlement of sediment and pollutants, in accordance with SuDS principles.
- 3.17 The proposed foul water drainage system will incorporate the existing Thames Water public foul drainage pipeline, which runs west to east through the centre of the development site. A new foul water discharge will be connected to the existing Thames Water public sewer network on School Lane, to accommodate the areas of the site that are unable to discharge to the existing foul sewer due to topographic restrictions. The proposed peak foul water discharge rate for the development is 1.7 l/s.

#### Ecology

- 3.18 ECOSA has carried out an Ecological Impact Assessment, which confirms that there are no statutory designated sites within a kilometre of the site, but the TBH SPA is approximately 5.8km to the south. The development proposal will, as a result, need to consider the potential effect on the integrity of ground nesting bird populations, for which the SPA is designed, and ensure that there are no overall adverse effects through the implementation of avoidance and mitigation measures where appropriate.
- 3.19 At a distance of 5.8km, it is considered that the 34 dwellings proposed will not result in any adverse impact on the SPA, particularly given the more convenient and accessible green spaces in close proximity to the site, for example, Bentley Playground to the south and the wooded area at Eggars Field. This is supported by the TBH SPA Delivery Framework (2009), which states that only larger developments of fifty or more units within five to seven kilometres of the SPA need to be considered as to whether they are likely to result in significant effects on the SPA, either in combination or isolation. Smaller developments, such as this, are not considered to present the risk of adverse effect.
- 3.20 The habitat value of the site is considered generally low, with the trees and scattered shrub providing potential habitat for a range of species, contributing to a wider network of semi-natural habitat linkages facilitating the movement of wildlife around the site and surrounding area. The proposed development includes site-wide planting, which benefits several species, as well as bird nesting and bat roosting features.
- 3.21 The overall conclusion of the report is that, subject to the implementation of the recommended measures for habitat retention, creation and enhancement, the development of the site will not result in a reduction in the ecological interest of the site or surrounding area, and as such, there is no overriding ecological constraint that would prevent the development of the site.

#### Arboriculture

- 3.22 The Arboricultural Method Statement (AMS), prepared by David Archer Associates, details the actions to be taken to prevent damage to the retained trees on the site and those adjacent to the site. The AMS confirms that the proposed drainage layout, including the proposed connections to the existing network, will have no impact on the retained trees.

#### Transport and Highways

- 3.23 The Transport Statement considers the highways and transport implications of the residential development of the site. The statement confirms that:

- The site is in an area that is accessible via a range of non-car modes of travel.
- An analysis of the personal injury accidents around the site did not identify any abnormal causation factors and as a result, the proposed development will not have an adverse effect on highway safety.
- Appropriate access to the site can be achieved from School Lane with adequate visibility.
- The proposed parking on the site is considered suitable and provided in accordance with the requirements.
- The trip generating impact of the proposed development is negligible and would not result in a severe impact on the operation or safety of the local highway network.

3.24 The overall conclusion of the report is that the residential development of the site will not result in an unacceptable impact on safety and there would be no residual or severe cumulative impact on the surrounding highway network.

#### Archaeology

3.25 The accompanying Archaeological Desk-Based Assessment assesses the available archaeological, topographic and historic land-use information on the site to establish the heritage significance and archaeological potential of the site.

3.26 With reference to archaeological assets, the assessment concludes that there are no statutory designations on or within close proximity to the site and as such, the proposed development will not result in an adverse impact on any designated archaeological assets. The site is partially within an Area of Archaeological Potential (to the north) and Historic Rural Settlement, which have been considered as part of the desk-based assessment.

3.27 The report confirms low potential for accommodating Prehistoric and Roman finds, and moderate potential for Medieval and Post Medieval archaeology, with the significance of any finds being of low or local value. Given that there is some potential for archaeological finds to be present, the overall conclusion of the assessment is that a geophysical survey be conditioned to establish any archaeological presence and resultant mitigation works necessary.

#### **iii. Summary**

3.28 In summary there are no technical constraints to the development of the site. In addition to delivering necessary housing, the development of the promotion site would generate several economic benefits:

- Short-term economic benefits in terms of construction (jobs, increased spending at local services, etc.)
- Long-term economic benefits in terms of ongoing landscaping, management of SUDS, site management and maintenance jobs, as well as CIL contributions for infrastructure improvements, new homes bonuses and Council Tax revenue and increased spending at the local services and facilities in Bentley.

13 January 2023

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

By email only

Dear Sir / Madam,

I write on behalf of my client, Taylor Wimpey Strategic Land, who control land at Alton Lane, Four Marks which has been promoted as the majority of the "Four Marks South" site. I am instructed to respond to the Council's currently consultation on its '**Regulation 18 Part 1: Local Plan Issues and Priorities: 2021-2040**'. The land controlled by Taylor Wimpey is outlined in red on the Plan included at Appendix A. The wider land holding controlled by the Four Marks South consortium is shown on the plan at Appendix B.

These representations respond to the questions contained with the Local Plan Issues and Priorities document, as follows:

**Climate Change Emergency:**

- **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)?**  
Happy
- **CLIM6a: Please explain your response:**

The Council proposes to use the concept of the '20 minute neighbourhood' approach to assist in directing new development to the most sustainable locations whereby future residents will have access to services and facilities. The Settlement Hierarchy Paper sets out that the notion of a '20 minute' walk in East Hants must be applied flexibly given the character of the district. The distances used by the Council within the Paper are measured 'as the crow flies'. In East Hants, the '20 minute neighbourhood' is based on access to facilities within 1,200m. This provides a reasonable basis upon which to assist sustainable (i.e. primarily walking/cycling) travel to facilities and allows for the holistic growth of settlements at a rate that infrastructure provision can keep pace with.

3 West Links, Tollgate, Chandlers Ford, Eastleigh, Hampshire, SO53 3TG

T [REDACTED]

Offices throughout the UK.

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The location of my client's site, in Four Marks, would assist with the creation of a greater proportion of the Four Marks population being able to access a '20 minute neighbourhood'. Four Marks South is located on the south side of the village, closest to the existing Primary School. As the crow flies, my client's site would be located just 650m from the school. It would also be less than that to the village centre, Four Marks Village Hall, the Good Shepherd CofE Church, Parish Council office, football club, scout hut, and children's play area. Four Marks South is therefore, ideally located to be part of a genuine '20 minute neighbourhood' as aspired to in response to the Climate Emergency.

Notwithstanding the general support for this approach, it is considered that the accessibility of the '20 minute' route should also be taken into account. For example, residents are more likely to walk a route if it is pleasant and safe to do so. My client's site in Four Marks would assist in enhancing the existing PROW between Alton Lane and the village centre that could form an important part of the '20 minute' route, through the southern part of Four Marks which would enhance and improve the likelihood of existing and future residents living by the concept and Four Marks continuing to be a genuinely sustainable location to live. My client's site is in proximity to services to ensure that all future residents could 'live locally'.

## **Population and Housing**

**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.**

The NPPF, paragraph 61, is clear that:

*"...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."*

Whilst it is recognised that the standard method for calculating Local Housing Need can only be calculated at the whole district level and that the district is split between the local planning authorities of East Hampshire and the South Downs National Park, this alone does not constitute "exceptional circumstances" and should not be a reason to deviate from the standard method.



This is because, as has previously happened, the two authorities are able to take a proportionate approach and split the relevant requirement. Furthermore, neither the May 2022 'Housing and Economic Needs Assessment' (2022 HEDNA) nor the accompanying 'Technical Note: Testing the Standard Method Housing Need for East Hampshire' (Technical Note) identify any compelling reasons to divert from the extant method. Indeed, the Technical Note identifies at page 16 that:

*"Overall, there is nothing in the analysis that supports moving to consider a lower figure for housing need than is derived from the standard method. It is recommended that the standard method figure should be used as the appropriate starting point for plan-making before other factors such as nationally significant constraints are taken into account."*

The current LHN calculation for the East Hampshire area, including the area in South Downs National Park, is 632dpa.

**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)**

Yes.

**POP2a Please explain your answer.**

The NPPF, paragraph 61, is clear that:

*"...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."*

Whilst it is recognised that the standard method for calculating Local Housing Need can only be calculated at the whole district level and that the district is split between the local planning authorities of East Hampshire and the South Downs National Parks, this alone should not be a reason to deviate from the standard method. This is because, as has previously happened, the two authorities are able to take a proportionate approach and split the relevant requirement. Furthermore, neither the May 2022 'Housing and Economic Needs Assessment' (2022 HEDNA) or the accompanying 'Technical Note: Testing the Standard Method Housing Need for East Hampshire' (Technical Note) do not identify any compelling reasons to divert from the extant method. Indeed, the Technical Note identifies at page 16 that:

*"Overall, there is nothing in the analysis that supports moving to consider a lower figure for housing need than is derived from the standard method. It is recommended that the standard method figure should be used as the appropriate starting point for plan-making before other factors such as nationally significant constraints are taken into account."*



The current LHN calculation for the East Hampshire area, including the area in South Downs National Park is 632dpa.

### Previous Levels of delivery

Table A below is adapted from the Council's 2021 and 2022 'Five-Year Housing Land Supply Position Statement'. This clearly identifies that within the areas of East Hampshire outside of the National Park has delivered 3,220 homes over the last five-years. This is an average of 644 dwellings, 127 dwellings greater than the proposed EHDC share of the requirement (517 dwellings).

Unfortunately, net dwelling completions for the South Downs National Park area of East Hampshire is currently only available up to 2019/20. However, over this period a further 436 dwellings were delivered in the National Park area of East Hampshire. This is an average of a further 145 dwellings. Giving a combined average of 789 dwellings per annum. This is significantly greater, nearly 25% (157 dwellings), than the minimum requirement identified by the standard method. To set a requirement below recent levels of delivery would be contrary to paragraph 60 of the NPPF and the need to 'boost significantly the supply of housing'.

Table A: Net Housing Delivery

Year	EHDC area	SDNP area	Total
2017/18	791	102	893
2018/19	948	156	1,104
2019/20	626	178	804
2020/21	360	N/A	N/A
2021/22	495	N/A	N/A

### Affordable housing need

The HEDNA table 13.3 identifies a need for 297 social affordable rented and 316 affordable home ownership products per annum. This is a total need of 613 affordable homes per annum. Whilst it is recognised that market housing is not the only delivery mechanism for such dwellings it is a primary contributor. The need for affordable homes approximates to the overall LHN requirement of 632dpa.



The HEDNA, paragraph 13.24 suggests that:

*“Despite the level of need being high, it is not considered that this would necessarily point to any requirement for the Council to increase the Local Plan housing requirement above that suggested by the standard method. The link between affordable need and overall need (of all tenures) is complex and in trying to make a link it must be remembered that many of those picked up as having an affordable need are already in housing (and therefore do not generate a net additional need for a home).”*

Whilst it is not disputed that the link between affordable need and overall need (of all tenures) is complex and that many of those picked up as having an affordable need are already in housing the HEDNA does not try to quantify this. The Council should seek to quantify this issue rather than simply dismiss it. Without such analysis it is impossible to identify if the need for affordable housing will be met. The current approach is considered contrary to paragraph 60 of the NPPF which requires ‘that the needs of groups with specific housing requirements are addressed’.

Given the scale of the affordable housing need within East Hampshire it is clear that an increase of the housing requirement would clearly assist in addressing the significant need for affordable housing.

### **Unmet Need**

EHDC falls within the PfSH area and there is a clear unmet need across the PfSH area (2022 HEDNA, paragraph 5.35). Whilst further work is being undertaken to assess the scale of this need EHDC should consider how and what role it could play in meeting these unmet needs.

### **Conclusion**

Based upon our analysis of the Council’s available evidence there is a clear and robust rationale to increase the housing requirement across the whole of the East Hampshire area above the minimum requirement set out by the LHN calculation.

### **NPPF consultation**

The Council will be aware that the Government is undertaking a consultation upon potential changes to the NPPF until 2<sup>nd</sup> March 2023. This consultation does not propose any changes to the standard method for calculating LHN. The proposed changes to paragraph 61 of the NPPF does suggest that the standard method is an advisory starting-point for establishing a housing requirement for the area. However, this needs to be read within the context of the whole paragraph which also identifies that it is the minimum number of homes required for an area.

**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.**

It is considered appropriate that some new housing is delivered within the SDNP area of East Hampshire. This is important to maintain the vibrancy and vitality of the area. It must, however, be recognised that the SDNP is designated as such due to the special qualities of the area. The NPPF is clear paragraphs 176, 177 and footnote 7 that great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks. This is clearly a constraint on achieving Local Housing Need across the SDNP area. This was recently reinforced by Michael Gove's Written Ministerial Statement on 6<sup>th</sup> December which preceded the current consultation upon the NPPF. This identified that National Park status is a clear factor in determining how many homes can actually be built, taking into account what should be protected in each area.

The SDNPA adopted a new plan on 2nd July 2019. Paragraph 7.20 of this plan re-iterates an earlier agreement between the EHDC and SDNP. This agreement is clear that SDNP will meet approximately 100 dwellings per annum until the East Hampshire Joint Core Strategy end date of 2028. This agreement formed part of the examination of the new SDNP plan and the Joint Core Strategy. It would appear contrary to these previous agreements and the special qualities of the SDNP area to seek agreement to increase the housing requirement by 15% to 115dpa. It should, however, be noted that over the SDNP Local Plan period 2017-2038 an average of just 79dpa will be delivered in East Hampshire. This is a reduction upon the 100dpa identified in the SDNP Local Plan and statement of common ground.

Based upon the above it is considered appropriate that SDNP continues to deliver a quantum of housing which takes account of its special qualities. However, increasing the requirement by 15% would appear contrary to the NPPF, as such it is not considered that the amount identified to be delivered by SDNP should remain at 100dpa.



**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.

The NPPF, paragraph 24, is clear that:

“Local planning authorities and county councils (in two-tier areas) are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries.”

Furthermore, it goes on to note (paragraphs 26 and 27) that this cooperation should be effective. Given that housing need is an issue which transcends boundaries consideration must be given to assisting neighbouring authorities meet any unmet needs. The scale of the assistance should be proportionate and based upon evidence not only of the scale of the need but also the capacity to accommodate such need. If EHDC were not to engage positively and seek to assist its neighbours in meeting these needs it would be clearly contrary to the NPPF and the plan would be unsound.

The current consultation upon potential changes to the NPPF also identifies (paragraph 67) that a local authority’s housing requirement may be higher than the identified housing need, if it includes provision for neighbouring areas, or reflects growth ambitions linked to economic development or infrastructure investment.



**Development Strategy and Spatial Distribution**

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

Order of preferred ranking	EHDC suggested option
1	Option 2: Concentrate new development in the largest settlements
2	Option 3: Distribute new development by population
3	Option 1: Disperse new development to a wider range of settlements
4	Option 4: Concentrate new development in a new settlement

**DEV2 Why have you ranked the options in this way? (Please give reasons for your chosen ranking)**

**Option 2 should be the preferred option** as it will ensure development is located in the most sustainable places with the highest number of existing services and facilities to support new development and vice versa. This will ensure development and infrastructure keep pace with one another over the longer term leading the most sustainable growth and evolution of the District.

In applying this approach consideration should be given to, not only the Tiers within the Settlement Hierarchy, but also the position / strength of the settlement within the overall Hierarchy of settlements. New development should be directed proportionately to the settlements in order of their scoring.

The appropriateness of the scoring is addressed later in this submission however, applying a corrected and more reasonable scoring approach shows that Four Marks will be ranked fifth within the overall Hierarchy and therefore, ideally located to accommodate a significant proportion of new housing over the Plan period.

**Option 3 is a reasonable approach** to take as it ensures that each of the ‘zones’ will grow at a rate proportion to its existing services and facilities and allow for a gradual increase of existing services over time of those areas that are currently less well populated to allow for a more holistic growth of the District led by the market and ultimately where people want to live.



**Option 1 raises issues relating to an uneven distribution of infrastructure investment and may decrease the sustainability of the District overall.** Option 1 is likely to lead to a higher number of smaller allocations which don't bring the added benefits of infrastructure investment associated with a more coordinated approach to development. As such, over the longer term, this approach would lead to an uneven pattern of development and infrastructure across the District.

**Option 4 is a fundamentally flawed approach.** Concentrating all new development into a new, single settlement is unreliable; these types of developments are often subject to delays during their application and build out phases resulting from issues associated with their size. There are often landowner complexities to negotiate and often unforeseen, outstanding issues / complications to address relating to both land acquisition and assembly, but also site specific issues such as the advance delivery of infrastructure that take significant time to address owing to the scale of this type of site. These all add undefinable amounts of time to the development process and ultimately, housing delivery. The Council also refers to the Garden City concept which relies very heavily on Planning Officers. That scale of development also carries a level of financial risk which financiers are less likely to take in the current economic climate. All of this means that Option 4 is an unreliable basis for ensuring housing delivery in the District.

As an aside, the Hierarchy maps shown for option 1 and 2 differ from one another; the Option 1 map shows Four Marks as a Tier 3 settlement whereas the map accompanying Option 2 shows it as Tier 2. The ranking of settlements should not be altered depending on which strategy is being considered. This does not provide a consistent basis from which to assess which is the preferred option moving forwards. It gives rise to ambiguity and confusion, particularly for those less familiar with the Local Plan process.

Overall and in line with the preferred approach outlined above (i.e. Option 2: Concentration in the largest settlements) Four Marks is ideally placed to accommodate new development through the Local Plan process. It is a Tier 2 settlement and should be ranked 5<sup>th</sup> overall across the District. It is located outside of the National Park and sustainably on the A31 providing access to higher order towns and cities. The settlement has a wide range of services and facilities that can support new development and vice versa.

My client controls land in Four Marks at Four Marks South. The site is located directly adjacent to the existing development fronting Blackberry Lane.

The site is located within 800m of the existing Village Centre, Four Marks Village Church and Four Marks Village Hall. It is well located to contribute to the '20 minute neighbourhood' concept as set out above.

The site is bordered on all sides by existing residential development and comprises predominantly agricultural grazing land of Grade 3 'poor' quality and equestrian paddocks. The site is therefore, considered to have limited ecological value, presenting opportunities to enhance flora and fauna as part of a site-wide approach to open space and biodiversity.



Vehicular access into the site will be taken from Alton Lane to the south. A public right of way passes along the east boundary of the site and travels between Blackberry Lane and Alton Lane which would provide pedestrians with direct, off-road access to the existing centre of the village. There are a series of footpaths on and around the site including footpath nos. 3, 16 and 17a to the east, north and west respectively. The 'made' Neighbourhood Plan identifies a local desire to link existing footpaths to enhance connectivity with Pilgrims Way and St Swithuns Way. My client's site is well placed to do that as well as contributing towards circular walks around the settlement to enhance the sense of community through potential for increased resident interaction.

Beyond, to the east is the National Park boundary which is separated from the site by Telegraph Lane. A landscape assessment concludes the site is contained by surrounding woodland, trees and housing. There are existing trees and hedgerows within the site and opportunities can be taken to retain and enhance these. The site has the potential to achieve biodiversity net gain. It currently consists of agriculturally improved grassland with low ecological value. It therefore meets the first requirement of biodiversity net gain which is to follow the mitigation hierarchy (avoid/reduce/compensate). There is also potential to provide new open space on the site.

The site forms a logical and sustainable extension to Four Marks which respects the historic pattern of growth of the village.

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

#### **DEV3a If yes, please explain.**

Through previous Local Plan consultation exercises (such as the Large Strategic Sites consultation in 2019) the Council considered a series of large sites capable of, collectively delivering the housing requirement across the District, in sustainable locations and at a scale that would make a significant contribution to infrastructure delivery (owing to their size). A significant amount of work and consideration, by both site owner teams and Planning Officers, went into a number of potential sites across the District. Much of that work carefully considered site constraints and was underpinned by detailed technical studies. Multiple rounds and types of consultation were carried out including with local residents and political engagement. It is clear, therefore, that the consideration of those sites at this stage would be well informed by earlier work. This work should not be abandoned, not only because it was well informed, but also because it has cost local taxpayers at a time of economic crisis.

That work should be continued and evolved to inform the development allocation process. As set out above, my client controls land at Four Marks South which was considered as part of a site submitted as part of the Large Strategic Sites consultation and accordingly can be swiftly remobilised for consideration in the emerging Local Plan.



## **Settlement Hierarchy**

The Settlement Hierarchy takes into consideration access to employment, Employment sites are defined in Appendix B and there are 29 in total. 15 are located in Alton which is considered to be a highest tier settlement along with Liphook, and Whitehill and Bordon. 2 employment sites are identified in each of these settlements leaving 10 remaining sites. 1 is in Bentworth Parish, 6 are in Horndean and the remaining three are in Four Marks. Four Marks therefore, has 50% more protected employment sites than two of the three settlements in the highest tier category. This is reflected in the scoring included in Appendix D however, when taken together with the factors outlined below relating to railway lines, food and beverage facilities, and Primary Schools, there is a clear case for Four Marks having better recognition as a high order settlement within the Settlement Hierarchy.

Points are also awarded where a settlement has a 'mainline railway station'. Whilst Four Marks doesn't have a mainline station, it does have a Watercress Line stop. Notwithstanding this does not provide consistent transport for residents, it does provide connection to other settlements, has potential to bring people to Four Marks who might spend money in local services and could also have future potential to provide a more useable rail connection. It is therefore, considered there should be some recognition of this in the scoring.

The scoring also separates pubs, restaurants and cafes. All three of these places are for people to meet, eat and drink which are essentially all the same activities / encourage the same social behaviours. Accordingly, they should be grouped together which would align the scoring for Four Marks, in relation to these types of facilities, with that of Alton, Liphook, and Whitehill and Bordon (the three highest order settlements).

Four Marks is also scored unfairly in relation to Primary Schools owing to the '20 minute neighbourhood mapping' (which is addressed below) whereby Four Marks scores zero. This is simply not true as there are two Primary Schools in Four Marks (and Medstead) but as they are not located within the Council's chosen (and arguably unrepresentative) '20 minute' measurement method for this settlement, Four Marks is unfairly penalised and scored down.

Taking the above into account whereby Four Marks gains 4 additional points (pubs – 1; railway line – 1; and Primary Schools – 2); Four Marks would be elevated to fifth on the overall ranking of settlements which suggests it is ideally located to accommodate additional development.

It is also interesting that whilst Four Marks has a Community Hall and Place of Worship, it doesn't have a youth or social club. Additional population in the settlement would increase the population and likelihood of that type of club being established which could be run from one of the existing facilities.

Turning to the Accessibility Mapping at Appendix E of the Settlement Hierarchy, Map 1 on page 28 appropriately shows my client's site within the 1,200m buffer. The 20-minute neighbourhood mapping for Four Marks (on page 30) shows an alternative approach to identifying a '20-minute neighbourhood' for Four Marks and Medstead (owing to the location of the Primary Schools relative to the local centre and concerns they would skew the results). This isn't considered to be a fair and



reasonable approach to the assessment of Four Marks in that the settlement has evolved in this way, over time, influenced by its geography and behaviour of its population. By applying a different assessment criteria to Four Marks the Council risks artificially directing development to areas that don't necessarily fit with its historic, holistic growth (which should, in part, inform future growth). As such, it is considered the '20 minute neighbourhood' measurement should be used consistently across all settlements and the '20 minute neighbourhood for Four Marks should be extended to incorporate the schools.

Interestingly, my client's site at Four Marks South falls within the '20 minute neighbourhood' using the Accessibility Mapping approach, the Council's skewed '20 minute neighbourhood', and the 'true' '20 minute neighbourhood'.

Taylor Wimpey control land at Four Marks South that could come forwards in isolation or as part of the wider land holding (see Appendix B). The area of land included within the wider land holding and, that which could be delivered by the consortium has been extended and is now capable of accommodating 600-850 dwellings together with the opportunity to provide commercial, education, recreation and community facilities. Four Marks South now measures a total of 40.79 hectares (100.80 acres). Given the unconstrained nature of the site and taking the sensible assumptions of 60% of the land being net developable (24.47ha) the site has the capacity to deliver the following housing figures as part of an allocation:

- 25dph – 611 dwellings
- 30 dph – 741 dwellings
- 35 dph – 856 dwellings

The Four Marks South Consortium have aligned to deliver a sustainable and comprehensive development that if allocated in the Emerging Local Plan, would provide all the homes, infrastructure, services, and facilities to meet the local needs of Four Marks/South Medstead. The proposal provides a natural extension to the Four Marks settlement boundary that would be immediately deliverable through a phased build programme due to having no major constraints to development.

Land to the south of Four Marks as shown in the enclosed plans represents a suitable, deliverable and sustainable location for future growth. There is the opportunity to provide for a larger strategic allocation on the southern edge of Four Marks at Alton Lane as well as the delivery of education facilities, community building, employment and improved connections to Four Marks by foot, cycle and car. All of the land is available and deliverable and could provide additional community benefits and help to deliver not only housing but community facilities and improved infrastructure. Through its strategic approach to housing distribution, the Council acknowledges that Four Marks is a sustainable location for new housing. It is well placed geographically within the District being outside of the National Park and it is located on the A31 which is a primary transport route through the northern part of the District. The existing settlement boundary for Four Marks abuts the site to the north, following the rear of properties fronting Blackberry Lane. The site itself lies within a block of land which is enclosed by existing housing fronting Blackberry Lane to the north-west,



Lymington Bottom to the south-west, and Telegraph Lane to the north-east, with a broken frontage of housing to Alton Lane to the south-east. This block of land is therefore in an urban fringe location with existing housing being visible on all sides. Given the existing settlement pattern of the village, the site represents a logical incremental extension to its built form which will not extend development into the open countryside. The location of the site provides the opportunity to link to both Blackberry Lane and Alton Lane and for the relocation of the existing primary school. This will bring the school closer to the centre of Four Marks and make walking and cycling a more sustainable option.

Allocating the south of Four Marks site will avoid the village continuing to experience piecemeal development which is unsustainable and unable to provide significant community facilities and infrastructure improvements. In addition, a larger development provides the opportunity to phase development in a coordinated and well-planned way which can include triggers for community facilities and infrastructure improvements to ensure these keep pace with housing delivery. The significance of infrastructure in Four Marks is highlighted in the made Neighbourhood Plan which states on page 5 that it is, '...very clear that residents are concerned that the investment in the infrastructure in our villages (Four Marks and Medstead) has lagged significantly behind the very rapid increase in the number of new houses that have been built'. The NP Steering Group identified the major infrastructure issues as relating to schools, medical facilities, water, sewage and electricity. The NP goes on to confirm that the lack of infrastructure is one of three key issues identified in response to a questionnaire distributed to all residents in the village stating, 'One of the most frequently expressed views was that the new houses had been built so recently that the infrastructure to support a sustainable community had failed to keep pace' with over 18% of respondents commenting that the lack of infrastructure was the most important factor in the future development of Four Marks. It is therefore clear that further development proposals in Four Marks should be of a strategic nature in order to achieve the central aims of the NP, which is clear that the infrastructure needs of Four Marks must be addressed. Given the relationship to existing residential development and the settlement boundary, the site forms a logical and sustainable extension to Four Marks. The combined site provides an opportunity to deliver a scale of development which can address the identified infrastructure constraints in the village, through a development in a sustainable location and of a form which respects the historic pattern of settlement growth locally.



## Community Facilities Study

The EHDC Community Facilities Study (September, 2022) identifies a '*notable absence*' of facilities in Four Marks in relation to the size of the village. It goes on to state that £1.25m of CIL funding was allocated to Four Marks Community Building and Recreational Hub. The project, led by FM Parish Council, stalled pending approval of the Public Works Loan Board however, this has now been conditionally approved.

This facility includes a 'Park and Stride' car park to serve the Primary School which would provide an additional sustainable, 'travel-to-school' option for families living outside the '20-minute neighbourhood' who need to travel by car. There are other benefits of this facility which would contribute to Four Marks being a sustainable place to locate additional growth; para 3.11 of the Settlement Hierarchy states;

*'The areas identified as 20-minute neighbourhoods should be 'complete, compact and connected neighbourhoods' but in the East Hampshire context, it is the aspect of connectivity, to enable **linked trips** between services and facilities on foot/by bike, that is most important.'*

The 'Park and Stride' facility would provide a place to park to enhance the connectivity between school drop-off/collection and other linked trips; those using the park and stride for school drop-off/collection would, at the same time, walk/cycle to the other local facilities meaning they would not carry out multiple trips by car.

Community Facilities are often Parish Council owned / led with upkeep relying on income made from hire out. As such, without a sufficient local population to generate a consistent hire out rate, and the associated income, the Parish Council may lack funds needed for the long-term upkeep and maintenance of new and existing community facilities meaning there is a risk they fall in degradation. There is evidence of a lack of community groups in the village that might hire out this type of facility because Four Marks scores a zero in the Settlement Hierarchy scoring in relation to Youth or Social Clubs. Additional local population would enhance the likelihood of these types of groups starting up and continuing over the longer term. Given the other well-established facilities in Four Marks, together with the existing commitment to provide additional community facilities, it follows that Four Marks is well located to accommodate additional housing to support committed local facilities to the benefit of existing and future residents.



I trust the above will be carefully taken into consideration when considering how best to distribute new development across the District. Taylor Wimpey Strategic Land has been fully engaged in the plan-making process in the district across a number of recent years, including involvement in the Large Strategic Sites Consultation initiative in 2019, and they would be pleased to further discuss the contribution to housing delivery that their land at Four Marks South can make during the plan period. In this regard, please contact me at [REDACTED] or on [REDACTED]  
[REDACTED]

Yours faithfully,

[REDACTED]

[REDACTED]

[REDACTED]

Enc. Appendix A – Plan no. A088659 LCP-01 Rev B  
Appendix B – P20-2241\_03F Concept Masterplan

16 January 2023

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

**By email only**

Dear Sir / Madam

We write on behalf of our client, Metis Homes Ltd, who control land at Chalk Hill Road in Horndean. We are instructed to submit written representations in response to East Hampshire District Council's (EHDC) current consultation on its **East Hampshire Local Plan 2021-2040 'Issues and Priorities Regulation 18 – Part 1'**. These written representations respond to the questions contained with the consultation document that are most relevant to our client's site, as set out below.

## **Background**

Our client's site at Chalk Hill Road has been promoted for residential development through previous drafts of the emerging Local Plan, including as part of the previous Regulation 18 consultation in early 2019.

Following this, the Council published its draft Spatial Strategy Preferred Option paper for consideration by the Full Council in September 2021. Within this paper, four "reasonable alternative" Spatial Strategy options were identified for inclusion within a Regulation 19 draft Local Plan (which at that time was anticipated to be published in April 2022). It was recommended by Officers (and agreed by the Planning Policy Committee in July 2021) that the Full Council should approve Preferred Option 2 for the Spatial Strategy. However, the Full Council resolved that more work needed to be completed on the four options before one should be selected for inclusion in the Regulation 19 version of the draft Local Plan.

It is noted that all four of the Spatial Strategy Preferred Options at this time specifically identified our client's site at Chalk Hill Road in Horndean as suitable, available and achievable for residential development such that, back in late 2021, it previously had a very good prospect of being allocated for housing in the emerging Local Plan.

3 West Links, Tollgate, Chandlers Ford, Eastleigh, Hampshire, SO53 3TG

T [REDACTED]

Offices throughout the UK.

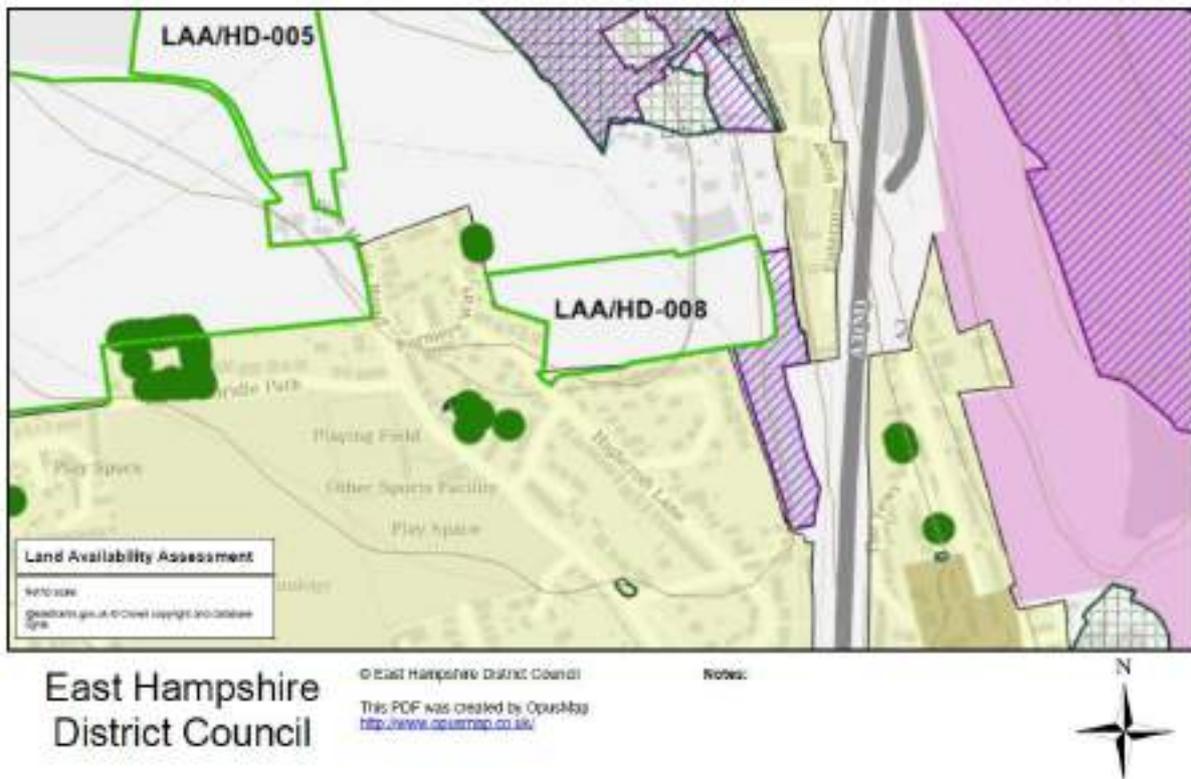
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As part of the Council's current online Land Availability Assessment, our client's site is identified under Reference Number LAA/HD-008, with a suggested capacity of 38 dwellings. It is confirmed to be available, achievable and developable with a timescale of 0-5 years (i.e. short-term). An extract from the Council's current online Land Availability Assessment mapping is included below to assist in identifying our client's site:



Our client's site extends to approximately 2.9 hectares on the northern edge of the settlement of Horndean. It shares its southern and eastern boundaries with residential development on Bentley Close and Highcroft Lane and is currently accessed from Chalk Hill Road via Highcroft Lane, in the south-west corner of the site.

The site represents a logical extension to the northern part of Horndean (especially in the context of existing residential development at the northern end of Highcroft Lane and Farmers Lane and The Grange to the north-west). It lies in a sustainable location for new residential development, within close proximity to a range of key services and facilities in the local area, within easy walking/cycling distance in the context of the Council's proposed new Settlement Hierarchy in the emerging Local Plan which is discussed in further detail in the following section of these written representations.



## **Climate Change Emergency (including comments on Settlement Hierarchy Background Paper)**

- **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)?** Happy.
- **CLIM6a: Please explain your response.** See below.

The Council has produced a new Settlement Hierarchy Background Paper (2022) to inform the emerging Local Plan, that emphasises accessibility on foot and by bike to enable people to live more locally in the future. To achieve the aim of 'living locally', the Council has based the proposed Settlement Hierarchy on defining '20-minute neighbourhoods' to assess the development potential of all settlements. This approach takes into account the level of services, facilities and accessibility within a settlement, with the aim of directing new development to the most sustainable locations.

The Settlement Hierarchy Background Paper confirms that '20-minute neighbourhoods' are based on giving people the ability to meet most of their daily needs in their local area, with 20-minutes identified as the time that people are willing to spend walking in order to meet their daily needs. For settlements within East Hampshire District, the Settlement Hierarchy Background Paper identifies an appropriate distance threshold for a 20-minute walk of 1,200 metres (as the crow flies) between groups of key services.

It is agreed that this approach provides an appropriate basis on which to determine a Settlement Hierarchy based on the most sustainable locations for development, both in term of the provision of key local services and facilities and the ability to use sustainable modes of travel (i.e. primarily walking/cycling) to access them. Our client is supportive of the proposed Settlement Hierarchy and '20-minute neighbourhood' approach now proposed by the Council in response to the Climate Emergency and the location of our client's site in Horndean is consistent with these.

Our client supports the identification of Horndean as a Tier 2 settlement, as determined by its scoring of 25 points (out of a possible 32 points) in Appendix D of the Settlement Hierarchy Background Paper, making it the highest scoring settlement within Tier 2. Confirmation that our client's site conforms with the '20-minute neighbourhood' approach is provided by Map 6 of Appendix E of the Settlement Hierarchy Background Paper, with a range of key services and facilities available within the identified 1,200 metre radius. As the crow flies, this includes, but is not limited to, Horndean Local Centre (at the junctions of London Road, Portsmouth Road and Havant Road) approximately 650m; Horndean Infant and Junior Schools approximately 550 metres; and Five Heads Recreation Ground approximately 250 metres.



**Development Strategy and Spatial Distribution (including comments on Spatial Development Options Background Paper)**

- **DEV1 Please rank these options in order of preference.** See table below.

Order of preferred ranking	EHDC suggested option
1	Option 2: Concentrate new development in the largest settlements
2	Option 3: Distribute new development by population
3	Option 1: Disperse new development to a wider range of settlements
4	Option 4: Concentrate new development in a new settlement

- **DEV2 Why have you ranked the options in this way? (Please give reasons for your chosen ranking).** See below.

**Option 2 should be the preferred option** for the Development Strategy and Spatial Distribution of new dwellings across the District. This option proposes to focus development in the 10 largest settlements which, according to the key diagram associated with Option 2, includes all Tier 1 and Tier 2 settlements, as well as the highest scoring settlements in Tier 3 (Holybourne and Rowlands Castle). The proposal to focus the provision of new dwellings in the largest settlements is most appropriate as they have been identified as the most sustainable locations in the District in terms of existing services and facilities (i.e. they achieve the highest scores in the Council’s Settlement Hierarchy Background Paper). It can also be reasonably assumed that these settlements represent the most popular places to live within the District due to the existing services and facilities available and it therefore follows that the demand for additional housing will be highest in these locations.

Option 2 is likely to represent the most effective and efficient way of achieving the Council’s ‘20-minute neighbourhood’ approach as presumably these larger settlements will offer a greater number of suitable residential sites and/or larger sites and therefore have the capacity to accommodate more new dwellings in locations which are already well-served by existing infrastructure, services and facilities within walking/cycling distance. This approach should therefore help to ensure that new residential development and infrastructure provision are aligned. However, it is also important to ensure that extra pressure is not added to existing services and facilities and focusing additional residential development in larger settlements should also offer the ability to provide additional infrastructure, services and facilities to serve the new dwellings as required, and to assist in achieving the ‘20-minute neighbourhood’ approach.



In applying the approach identified by Option 2, consideration should be given to not only the Tiers within the Settlement Hierarchy, but also the position / strength of the settlement within the overall Settlement Hierarchy. New development should be directed proportionately to the settlements in order of their scoring. Horndean is the highest scoring settlement in Tier 2 (with 25 out of a possible 32 points and between 4–7 points higher than the other Tier 2 settlements) and is ranked fourth overall in the Settlement Hierarchy. It is therefore identified as appropriate to accommodate a significant proportion of new housing over the Plan period in terms of its size and sustainability (i.e. existing infrastructure provision).

Within each settlement, the identification of sites for new housing should also be carefully considered on the basis of the Council's '20-minute neighbourhood approach', with priority given to those sites which are closest to existing services and facilities (or which have the ability to provide additional infrastructure to meet any identified need within the settlement).

The approach proposed by Option 2 is the most consistent with the previous work completed in preparing the previous Regulation 18 Local Plan for consultation in early 2019 and the subsequent draft Spatial Strategy Preferred Option paper published in late 2021. At this time, the Council did not necessarily consider the previous Spatial Strategy preferred option to be flawed, but instead required further assessment of this and the other options to be completed. This previous work should therefore remain the starting point for identifying the preferred option for the Development Strategy and spatial distribution of new housing in the emerging Local Plan, and the significant amount of work (and associated time and cost) that has already been completed in assessing settlements and identifying sites as suitable for residential development should now be built upon.

**Option 3** seeks to direct new residential development to the three regions of the District according to their population. Under this model, the Southern region would be allocated the least development on the basis that it contains the fewest settlements and largely comprises the South Downs National Park. However, just because a greater proportion of the population live in the other two regions, this does not necessarily mean that they are best placed to accommodate the most additional development as it is important to consider the individual settlements themselves. For example, even though the North West and North East regions comprise a larger proportion of the existing population, they also contain a number of Tier 3 settlements which are less sustainable and may be less suitable for accommodating additional development without significant investment in infrastructure provision. Even though the Southern region has a smaller current population, it still contains two Tier 2 settlements (Horndean and Clanfield) which are appropriate to accommodate a significant proportion of new housing over the Plan period in terms of their size and sustainability. It is therefore considered more appropriate to direct future growth according to an assessment of the suitability of individual settlements (as per Option 2), rather than on the basis of existing population.

The Southern Region also contains that part of the District within the Partnership for South Hampshire (PFSH) area. The proposal within Option 3 to intentionally direct less growth to the



Southern Region of the District (and therefore the PfSH area) may be inconsistent with and adversely affect the ability to meet the objectives of PfSH and should be considered carefully.

If Option 3 is identified as the Council's preferred option, the allocation of suitable sites for new housing within each region should be informed by the Settlement Hierarchy and focused on the most sustainable settlements. However, this would effectively result in creating a Spatial Strategy that is a constrained version of Option 2, whereby development is directed to the highest order settlements but could be capped unnecessarily depending on which region it falls within. Option 2 is therefore preferable.

**Option 1** seeks to disperse new development to a wider range of settlements, including Tier 3 settlements. This approach could have the benefit of increasing the core population to support existing services and facilities, e.g. village primary schools. It could also have the benefit of improving the sustainability of some of the smaller settlements, but only if new development can deliver additional services and facilities to meet the needs of the existing and future population. It is likely that additional development in Tier 3 settlements will only be of a small-scale and will not be capable of delivering infrastructure improvements and could, instead, place increased pressure on any existing facilities and services and increase the reliance on trips by car to meet daily needs (with associated greenhouse gas emissions etc). This option is therefore more likely to result in new residential development and infrastructure provision being misaligned. This option also reduces the amount of development to be directed to the most sustainable settlements, including Horndean. Allocating a larger proportion of development to smaller settlements could also have a greater adverse landscape and biodiversity impacts, as these settlements are often inherently more rural in character. For these reasons, Option 1 is considered less preferable to Option 2 and Option 3.

**Option 4** suggests concentrating development into a new settlement for over 1,500 dwellings with associated new community facilities, employment opportunities and open space provided in close proximity to the new dwellings. This approach is risky as it heavily relies on one site to deliver housing in the District and these types of large-scale developments are often subject to lengthy delays during both the application and construction phases. For this reason, it is considered the least favourable option for the Council's Development Strategy and Spatial Distribution.

This option would also reduce the amount of new housing provided in or adjoining existing settlements, although the Council acknowledges that Option 4 would still require some further development in other locations. If Option 4 is identified as the Council's preferred option, the allocation of suitable sites for new housing should be informed by the Settlement Hierarchy and focused on the most sustainable settlements, including Horndean.

- **Other considerations relating to the Development Strategy and Spatial Distribution**
  1. The key diagrams which illustrate Options 1 and 2 for the Council's Development Strategy and Spatial Distribution differ from one another; the Option 1 key diagram shows Four Marks, Clanfield and Grayshott as Tier 2 settlements whereas the key diagram



accompanying Option 2 shows them as Tier 3 settlements. The ranking of settlements should not be altered depending on which option is being considered and should be based on the assessment and scoring set out in the Council's Settlement Hierarchy Background Paper. Otherwise, this does not provide a consistent basis from which to assess which is the preferred option moving forwards. It gives rise to ambiguity and confusion, particularly for those less familiar with the Local Plan process.

2. The Council has produced a Spatial Development Options Background Paper (2022) to inform the emerging Local Plan. Paragraph 1.4 of this paper states that *"...the actual delivery of any strategy will depend upon the sites available to be identified for development and this will be part of the next consultation on the Local Plan scheduled for mid 2023, once an appropriate strategy has been determined and assessed."* Further to this, page 52 of the Council's 'Issues and Priorities Regulation 18 – Part 1' document states that the current consultation only relates to 'high-level principles' in terms of the areas or settlements that would be prioritised for exploring where new housing should be located, rather than requiring the submission of details of specific sites / neighbourhoods for future residential development at this stage.

However, in our view the above approach is flawed because if, by the Council's own acknowledgement, the actual delivery of any Spatial Strategy is dependent upon the identification of suitable sites, it follows that the assessment of potential sites should happen at the same time to inform the selection of the preferred Spatial Strategy. Otherwise, a position may be reached whereby a preferred Spatial Strategy is identified but it is later realised that there are not enough suitable sites which are available, deliverable and developable in order to achieve the preferred Spatial Strategy, resulting in abortive work and time and the need to return to the consideration of an alternative Spatial Strategy. It is instead considered more appropriate to assess the potential sites which may contribute to achieving each of the Spatial Strategy options, to assist in identifying any which may be inappropriate and confirm the preferred option.

Further to the above, these written representations identify and provide an overview of our client's site to confirm that it remains available, deliverable and developable in the short-term for residential development (as identified in the Council's current online Land Availability Assessment and summarised above). A more detailed assessment and supporting technical information can be provided to the Council for our client's site as required. Despite our ranking of the Council's four proposed Spatial Development Options above, our client's site in fact has the benefit of being consistent with and able to contribute to all of them. It is therefore suggested that our client's site is identified as an appropriate allocation for housing as part of its initial assessment of all four options, and in whichever the Council selects as its preferred option going forward to the next stage of the emerging Local Plan. This approach is similar to that adopted by the Council in preparing the previous draft Spatial Strategy Preferred Option paper in September 2021, when our client's site was specifically identified as a housing allocation in all four of the options being suggested at this time.



Overall, Horndean is ideally placed to accommodate new development. It is the highest-scoring Tier 2 settlement and is ranked fourth overall across the District. It is located outside of the South Downs National Park and adjacent to the A3(M), providing access to higher order towns and cities. The settlement has a wide range of services and facilities that can support new development and vice versa. It is therefore appropriate to accommodate a significant proportion of new housing over the Plan period in terms of its size and sustainability. Our client's site has previously been identified and continues to be one of the preferred sites for residential development in Horndean.

We trust the above comments are helpful and will be taken into consideration when a preferred spatial strategy for the distribution of new development across the District is identified. Our client would be pleased to further discuss their land at Chalk Hill Road, Horndean with Officers in greater detail at the appropriate time. In this regard, please do not hesitate to contact me at ■■■■■ or on ■■■■■ as required.

Yours faithfully

East Hampshire District Council  
Planning Policy Team  
By email only

05<sup>th</sup> January 2023

Dear Sirs,

CHURCHILL RETIREMENT LIVING  
RESPONSE TO THE EAST HAMPSHIRE DISTRICT COUNCIL- LOCAL PLAN 2021-  
2040 ISSUES & OPTIONS CONSULTATION

Thank you for the opportunity to comment on the consultation papers for the aforementioned document. Churchill Retirement Living is an independent developer of retirement housing for sale to the elderly. Please find below our comments on the Issues and Options consultation, which specifically address the need for specialist housing for the elderly.

National Policy Context

Government's policy, as set out in the revised NPPF, is to boost significantly, the supply of housing. Paragraph 60 reads:

*"To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay."*

The revised NPPF looks at delivering a sufficient supply of homes, Paragraph 62 identifies within this context, the size, and type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies including older people.

The January 2023 consultation on proposed amendments to the NPPF enhances the requirement for assessing the housing needs of older people to differentiate between specialist housing typologies such as 'retirement housing, housing-with-care and care homes' (Paragraph 63).

In June 2019 the PPG was updated to include a section on Housing for Older and Disabled People, recognising the need to provide housing for older people. Paragraph 001<sup>1</sup> states:

*"The need to provide housing for older people is **critical**. People are living longer lives and the proportion of older people in the population is increasing. In mid-2016 there were 1.6 million people aged 85 and over; **by mid-2041 this is projected to double to 3.2 million**. Offering older people a better choice of accommodation to suit their changing needs can help **them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems**. Therefore, an understanding of how the ageing population affects housing needs is **something to***

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<sup>1</sup>Planning Practice Guidance, Paragraph: 001 Reference ID: 63-001-20190626. Available here: <https://www.gov.uk/guidance/housing-for-older-and-disabled-people>

*be considered from the early stages of plan-making through to decision-taking”*  
(emphasis added)

Paragraph 003<sup>2</sup> recognises that

*“the health and lifestyles of older people will differ greatly, as will their housing needs, which can range from accessible and adaptable general needs housing to specialist housing with high levels of care and support.”*

Thus a range of provision needs to be planned for. Paragraph 006<sup>3</sup> sets out

*“plan-making authorities should set clear policies to address the housing needs of groups with particular needs such as older and disabled people. These policies can set out how the plan-making authority will consider proposals for the different types of housing that these groups are likely to require.”*

Therefore, recognising that housing for older people has its own requirements and cannot be successfully considered against criteria for general family housing.

### Need for Older Persons’ Housing

It is well documented that the UK faces an ageing population. Life expectancy is greater than it used to be and as set out above by 2032 the number of people in the UK aged over 80 is set to increase from 3.2 million to five million (ONS mid 2018 population estimates).

The Homes for Later Living Report notes the need to deliver **30,000 retirement and extra care houses a year** in the UK to keep pace with demand (September 2019).

The age profile of the population can be drawn from the most recent Census (2021). This advises that the total population size in 2021 was 125,741, of which 29,060 persons were aged 65 and over, comprising 23% of the total population. The population aged 80 and over, who are generally more likely to be frail and in need of long-term assistance comprises 8,158 persons or 6.5% of the population.

The 2018 population projections from the Office for National Statistics advises that the population aged 65 and over is projected to increase by 12,597 (43%) to 41,657 persons by 2040, accounting for 31% of the total population of the District. The number of individuals aged 80 and over is expected to increase more sharply with an increase of 7,194 residents (88%) to 15,352 persons over the same period.

It is therefore clear there will be a significant increase in older people over the Plan Period and the provision of suitable housing and care to meet the needs of this demographic should be a priority of the emerging Local Plan.

### Benefits of Older Persons’ Housing

Older peoples housing produces a large number of significant benefits which can help to reduce the demands exerted on Health and Social Services and other care facilities – not only in terms of the fact that many of the residents remain in better health, both physically and mentally, but also doctors, physiotherapists, community nurses, hairdressers and

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<sup>2</sup> Planning Practice Guidance, Paragraph: 001 Reference ID: 63-003-20190626. Available here: <https://www.gov.uk/guidance/housing-for-older-and-disabled-people>

<sup>3</sup> Planning Practice Guidance, Paragraph: 001 Reference ID: 63-006-20190626. Available here: <https://www.gov.uk/guidance/housing-for-older-and-disabled-people>

other essential practitioners can all attend to visit several occupiers at once. This leads to a far more efficient and effective use of public resources.

### Economic

The report '*Healthier and Happier: An analysis of the fiscal and wellbeing benefits of building more homes for later living*' by WPI Strategy for Homes for Later Living explored the significant savings that Government and individuals could expect to make if more older people in the UK could access this type of housing. The analysis showed that:

- 'Each person living in a home for later living enjoys a reduced risk of health challenges, contributing to fiscal savings to the NHS and social care services of approximately £3,500 per year.
- Building 30,000 more retirement housing dwellings every year for the next 10 years would generate fiscal savings across the NHS and social services of £2.1bn per year.
- On a selection of national well-being criteria such as happiness and life satisfaction, an average person aged 80 feels as good as someone 10 years younger after moving from mainstream housing to housing specially designed for later living.'

**Each person living in a home for later living enjoys a reduced risk of health challenges, contributing fiscal savings to the NHS and social care services of approximately £3,500 per year** (*Homes for Later Living September 2019*). More detail on these financial savings is set out within the report.

A recent report entitled *Silver Saviours for the High Street: How new retirement properties create more local economic value and more local jobs than any other type of residential housing* (February 2021) found that retirement properties create more local economic value and more local jobs than any other type of residential development. For an average 45 unit retirement scheme, the residents generate £550,000 of spending a year, £347,000 of which is spent on the high street, directly contributing to keeping local shops open.

As recognised by the PPG, Retirement housing releases under-occupied family housing and plays a very important role in recycling of housing stock in general. There is a 'knock-on' effect in terms of the whole housing chain enabling more effective use of existing housing. In the absence of choice, older people will stay put in properties that are often unsuitable for them until such a time as they need expensive residential care. A further Report "*Chain Reaction: The positive impact of specialist retirement housing on the generational divide and first-time buyers* (Aug 2020)" reveals that about two in every three retirement properties built, releases a home suitable for a first-time buyer. A typical Homes for Later Living development which consists of 40 apartments therefore results in at least 27 first time buyer properties being released onto the market.

### Social

Retirement housing gives rise to many social benefits:

- Specifically designed housing for older people offers significant opportunities to enable residents to be as independent as possible in a safe and warm environment. Older homes are typically in a poorer state of repair, are often colder, damper, have more risk of fire and fall hazards. They lack in adaptations such as handrails, wider internal doors, stair lifts and walk in showers. Without these simple features everyday tasks can become harder and harder

- Retirement housing helps to reduce anxieties and worries experienced by many older people living in housing which does not best suit their needs by providing safety, security and reducing management and maintenance concerns.
- The Housing for Later Living Report (2019) shows that on a selection of wellbeing criteria such as happiness and life satisfaction, an average person aged 80 feels as good as someone 10 years younger after moving from mainstream housing into housing specifically designed for later living.

### Environmental

The proposal provides a number of key environmental benefits by:

- Making more efficient use of land thereby reducing the need to use limited land resources for housing.
- Providing housing in close proximity to services and shops which can be easily accessed on foot thereby reducing the need for travel by means which consume energy and create emissions.
- Providing shared facilities for a large number of residents in a single building which makes more efficient use of material and energy resources.
- The proposal includes renewable technology through the use of solar panels to assist in the reduction of CO<sub>2</sub> emissions.
- All areas of the building will be lit using low energy lighting and where applicable utilise daylight and movement sensor controls.

### Recommendations

Given all these factors and the guidance of the PPG, we consider that the best approach towards meeting the diverse housing needs of older people is **for the Local Plan to give the earliest consideration towards how best to meet these needs and to include a standalone policy in this respect.** Such policies should encourage the delivery of specialist forms of accommodation for older people and not be criteria led. Developers should not be required to demonstrate need given the many benefits that such developments bring and if a quantum is specified this should be regarded as a target and not a ceiling. Given also that such developments “*help reduce costs to the social care and health systems*” (PPG refers), requirements to assess impact on healthcare services and/or make contributions should be avoided.

While we appreciate that no one planning approach will be appropriate for all areas, an example policy is provided that, we hope, will provide a useful reference for the Council:

*“The Council will encourage the provision of specialist housing for older people across all tenures in sustainable locations.*

*The Council aims to ensure that older people are able to secure and sustain independence in a home appropriate to their circumstances by providing appropriate housing choice, particularly retirement housing and Extra Care Housing/Housing with Care. The Council will, through the identification of sites, allowing for windfall developments, and / or granting of planning consents in sustainable locations, provide for the development of retirement accommodation, residential care homes, close care, Extra Care and assisted care housing and Continuing Care Retirement Communities.”*

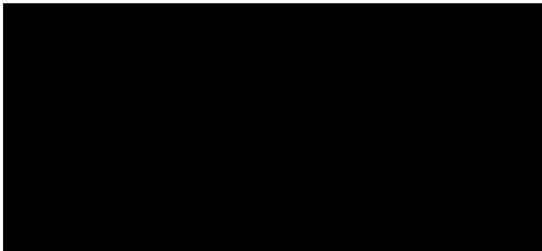
We would respectfully remind the Council of the increased emphasis on Local Plan viability testing in Paragraph 58 of the NPPF and that the PPG states that *“The role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan”* (Paragraph: 002 Reference ID: 10-002-20190509).

The evidence underpinning the Council's planning obligations and building requirements should therefore be robust

We would also like to respectfully remind the Council that the viability of specialist older persons' housing is more finely balanced than 'general needs' housing and the respondents are strongly of the view that these housing typologies should be robustly assessed in the forthcoming Local Plan Viability Assessment. This would accord with the typology approach detailed in Paragraph: 004 (Reference ID: 10-004-20190509) of the PPG which states that. *“A typology approach is a process plan makers can follow to ensure that they are creating realistic, deliverable policies based on the type of sites that are likely to come forward for development over the plan period. If this is not done, the delivery of much needed specialised housing for older people may be significantly delayed with protracted arguments about failure to meet affordable housing policy requirements which are wholly inappropriate when considering such housing*

Thank you for the opportunity for comment.

Yours faithfully



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



Sent by email only to: [localplan@easthants.gov.uk](mailto:localplan@easthants.gov.uk)

13 January 2023

Dear Sir/Madam

### **EAST HAMPSHIRE LOCAL PLAN ISSUES AND PRIORITIES REGULATION 18 PART 1 CONSULTATION 2023**

We write in response to the above consultation on behalf of the Herriard Estates who have land interests in the area.

The National Planning Policy Framework (NPPF) has a clear objective of *'significantly boosting the supply of homes'*<sup>1</sup> citing that to do this *'it is important that a sufficient amount and variety of land can come forward where it is needed'*. The NPPF specifically recognises that *'small and medium sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly'*<sup>2</sup>. As such the NPPF requires at least 10% of the housing requirement should be on small sites<sup>3</sup>, strong reasons must be provided where it is not. We note that responses to the previous Regulation 18 consultation encouraged more smaller sites to be allocated to conform with the NPPF, citing that there was an over reliance on large sites<sup>4</sup>.

The NPPF also promotes identifying opportunities for sustainable housing development in rural areas where development would *'enhance or maintain the vitality of rural communities'*. In the same paragraph it goes on to say that *'Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby'*<sup>5</sup>.

The Planning Practice Guidance (PPG) similarly outlines that *'People living in rural areas can face particular challenges in terms of housing supply and affordability, while the location of new housing can also be important for the broader sustainability of rural communities'*. It goes on to recognise that *'a wide range of settlements can play a role in delivering sustainable development in rural areas, so blanket policies restricting housing development in some types of settlement will need to be supported by robust evidence of their appropriateness'*<sup>6</sup>.

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<sup>1</sup> NPPF July 2021 Paragraph 60.

<sup>2</sup> NPPF July 2021 Paragraph 69

<sup>3</sup> NPPF July 2021 Paragraph 69 a)

<sup>4</sup> Housing Needs and Requirements Background Paper, final bullet point, page 12.

<sup>5</sup> NPPF July 2021 Paragraph 79

<sup>6</sup> Paragraph: 009 Reference ID: 67-009-20190722. Revision date: 22 07 2019

The recently released proposed revisions to the NPPF continue to support and align with current national policy outlined above.

Reflecting on national policy and recognising the rural character of East Hampshire (EH) which comprises mainly small, low-density settlements<sup>7</sup>, in response to **questions DEV1 and DEV2** of the consultation (which asks you to rank the proposed development strategy options for housing and why), it is our view that *'Option 1: Disperse new development to a wider range of settlements'* would be the most appropriate strategy for growth in East Hampshire. A dispersal strategy would provide the opportunity for a wide range of settlements to grow and thrive and continue to support the viability and vitality of local services which they rely on. Options 2 and 4 which seek to concentrate development in the largest settlements or create a new settlement (respectively) are the least favourable. Amongst other things, these options would not meet the development needs of the existing rural communities, in particular the smaller rural communities, and would further increase emissions from longer unsustainable travel districtwide, both identified as negative effects of these options by the draft plan<sup>8</sup>.

However, while we generally support a dispersal strategy, as it stands Option 1 is too narrow and needs to be explored further (**questions DEV3 and DEV4**). As currently drafted it only looks at *'potentially including some of the smaller villages of the planning area'*<sup>9</sup> (*our emphasis*) namely those in Tiers 1-3 and excludes the Tier 4 smaller settlements of the Settlement Hierarchy, at least half of which are located in the North West of the District. While the Settlement Hierarchy is a helpful starting point in identifying possible sustainable locations for development through an understanding of the sustainability of settlements and the location and accessibility of local services and facilities, it doesn't appropriately allow for consideration to be given to groups of villages who benefit from shared local services and facilities, such as primary schools, and the vital combined role they play in supporting and sustaining the everyday lives of smaller rural communities.

Therefore, when reviewing the settlement hierarchy in regard to the rural areas, settlements should be ranked in relation to the role they play in the wider rural area, and not just the facilities and services that they may already accommodate on an individual basis. In reality, groups of settlements interact and support each other, with varying but complementary attributes, they should not and cannot therefore be considered as isolated or independent settlements. This more comprehensive approach would continue to support and further enhance the concept of 'living locally' which forms the basis for the revised settlement hierarchy, giving all parts of the East Hampshire community the ability to meet their everyday needs in their local area.

The settlement hierarchy and the "living local" concept is based on a 20 minute neighbourhood idea which centres around giving people the ability to meet their daily needs in their local area and thus increasing walking and cycling. This aspiration needs to be balanced with the rural character of the district when planning future development. The NPPF recognises that *'opportunities to maximise sustainable transport solutions including walking and cycling will vary between urban and rural areas, and this should be taken into account in plan making'*<sup>10</sup>. It is acknowledged that the Settlement Hierarchy Paper recognises that in a district like East Hampshire the 20 minute neighbourhood needs to be interpreted flexibly as distances between homes, facilities and services may be relatively high and as

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<sup>7</sup> Settlement Hierarchy Background Paper, Paragraph 3.11, Page 6.

<sup>8</sup> East Hampshire Local Plan 2021-2040 Issues and Priorities Regulation 18- Part 1. Pages 56 and 58

<sup>9</sup> East Hampshire Local Plan 2021-2040 Issues and Priorities Regulation 18- Part 1. Page 54

<sup>10</sup> NPPF July 2021 Paragraph 105

such has adjusted the 20 minutes to 'as the crow flies'<sup>11</sup>. However, it must be questioned whether it is reasonable to assume that people can access everyday services on foot or by bike in the more rural parts of the district as roads are often unlit and not served by footways. Further consideration may therefore need to be given to whether the ability to walk or cycle in such locations to services and facilities is an appropriate, particularly when considering Paragraph 105 of the NPPF.

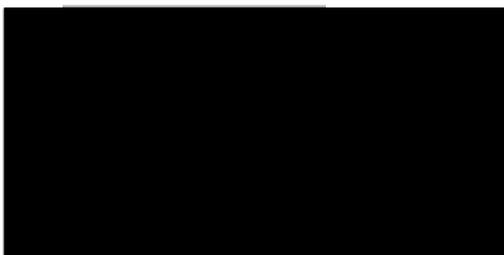
Positive planning is needed to ensure that rural settlements do not fall into the 'sustainability trap' and become dormant communities whereby policies prevent growth solely due to lack of facilities, and what facilities exist, such as village schools, pubs, churches, and local shops, eventually failing, further reducing the ability for communities to live locally and increase their reliance on travelling elsewhere for everyday needs. As already outlined, national policy continues to support growth in the rural areas, to sustain thriving communities and help address the problems of affordability and lack of choice in housing to cater for changing needs, for example young people and the elderly, wanting to move out or downsize and continue to live locally. The Housing Needs and Requirements Background Paper<sup>12</sup> identifies the affordability ratio for the planning area is 13.4 which is notably high. The delivery of small, sites which can offer homes to serve different parts of the community could assist with reducing this.

In conclusion, while we support the option for a strategy of dispersal, consideration should be given to extending this to allocating sites and/ or ensuring that small and medium sized developments can come forward in the rural settlements in a sustainable way. Furthermore, sustainability should not be judged solely on the settlement a development falls within/ adjoins, it should be considered more comprehensively within the wider context of services and facilities that would support the development. The development strategy should therefore allow growth in settlements across all of Tiers 1-4, proportionate to the size of the settlement they are extending or where a need can be identified for development in the local community, for instance to support an important/ vital local service such as a primary school. Reasonable scale development in one or a number of small village may assist the surrounding rural communities deliver joint aspirations for new local infrastructure either by providing a land resource or CIL/S106 contributions further enhancing their ability to live locally.

A more dispersed strategy of this kind will not only help to strengthen future delivery, rather than rely on a few strategic sites or a new settlement which can be liable to delays as issues such as major infrastructure requirements are resolved, but also help to level up social and economic opportunities available to communities as the government aspires to do in the proposed planning reforms.

We would be grateful if you could acknowledge receipt of this letter. If you have any questions or comments, please don't hesitate to contact us.

Yours Faithfully



<sup>11</sup> Settlement Hierarchy Background Paper, Paragraph 2.7, Page 5.

<sup>12</sup> Housing Needs and Requirements Background Paper, Table 2: Estimated LHN using Household Growth based on Trends, Page 24.

## **EAST HAMPSHIRE LOCAL PLAN 2021-2040**

### **ISSUES AND PRIORITIES REGULATION 18 - PART 1**

#### **REPRESENTATIONS SUBMITTED ON BEHALF OF REVERE LIFE**

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These representations are submitted on behalf of Revere Life in response to the East Hampshire Local Plan 2021-2040 (Issues and Priorities).

By means of background, Revere Life's interest in the emerging Local Plan process arises from their proposed acquisition of land at the former Molson Coors Brewery Site in Alton to provide a new integrated retirement community.

Revere Life's proposed retirement community in Alton provides an opportunity for residents to live independently in high-quality, self-contained accommodation while having access to 24-hour, on-site care and a range of community and shared facilities. The model is based on the concept of encouraging and facilitating "wellness" in older people, by providing a suitable, safe and secure environment where care and assistance, tailored to suit individual's needs, can be provided within peoples' homes, on a flexible individual basis and which can be increased over time.

The proposed retirement community in Alton will address many key policy issues at a local and national level:

- Fulfilling a critical local need for older persons housing as people are living longer lives and the proportion of older people in the population is increasing.
- Providing older people with an aspirational and fulfilling lifestyle in a supportive environment which can adapt to changes in healthcare and support needs over time.
- Freeing up market housing – by focusing on residents who wish to downsize, the Revere Life model will release under-utilized family housing to the market.
- Contributing towards the Council's wider housing needs and the five-year housing land supply.
- Minimising healthcare costs - the demands placed on the local NHS are estimated to be reduced by 30% where residents live in a retirement community or extra care scheme offering the range of care and support offered by Revere Life.
- Generating a substantial number of jobs, with the majority available to local people.

The former Molson Coors site in Alton adjoins the town centre and therefore represents a highly sustainable location for the proposed use. The use is compatible with its neighbours, including the proposed new residential development on the former brewery site, and it will offer housing choice, thereby supporting the creation of a mixed, inclusive and sustainable community.

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

Revere Life fully supports the Council in preparing a specific policy on older persons accommodation. The elderly UK population is set to grow dramatically over the coming years and the increasing divide between demand and supply is likely to result in the next housing crisis.

The delivery of homes for older people also plays an essential part in realising the Council's housing numbers and in delivering balanced communities.

An appropriate policy or policies, informed by a robust evidence base, should be in place to support future housing provision for older people. Any such policies will also provide a positive context for developers and operators of these schemes to compete within the general residential market.

In progressing policies relating to Older Persons Housing, Revere Life would recommend that consideration be given to the following:

- The inclusion of a specific 'minimum' target in terms of numbers of homes for older persons accommodation to be delivered within the plan period. It is further recommended that the policy includes an indicative annualised benchmarks against which delivery can be monitored. This will allow the Council to plan for the right type of accommodation in the Borough and for this provision to be effectively monitored and reviewed.
- As noted in National Planning Policy Guidance, there are several older persons housing types that collectively cater for the housing needs of older people. A clear distinction should be made between the local requirements for traditional care home accommodation and other forms of specialist housing (including a breakdown between tenures if this level of information is available).
- The policy or the supporting text should include an overview of the preferred site selection criteria in assessing the suitability of future proposals on non-allocated sites (key settlements, proximity to local services and amenities etc). Where available, Revere Life strongly supports the optimisation of brownfield land in existing urban areas. As identified in National Planning Policy Guidance, *"The location of housing is a key consideration for older people who may be considering whether to move...to more suitable forms of accommodation). Factors to consider include the proximity of sites to good public transport, local amenities, health services and town centres."*

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

Revere Life would recommend that any older person's housing policy also provide guidance on the following matters:

#### Housing multiplier

Revere Life fully supports the Council in including older person accommodation as part of its housing supply and delivery targets. Such an approach should apply to all forms of older person's housing, regardless of whether a scheme falls within Use Class C2 or C3.

In assessing the contribution, Revere Life note that East Hants Council is proposing to apply a multiplier such that the number of dwellings generated by accommodation in C2 use is derived by dividing the number of bed spaces by 1.9. Revere Life supports this approach when assessing the contribution made by traditional care or nursing home accommodation. However, the contribution made by retirement community or extra care schemes (regardless of use class) is considered to be higher on the basis that the accommodation comprises self-contained units (with associated communal and support facilities) and caters for both couples and single people moving away from the 'family' home. If a multiplier is to be used it should be assessed separately to that for single care home bedspaces.

### Affordable housing

Revere Life recommends that the Council provides a clear statement in respect of any affordable housing obligations arising from extra care and retirement housing schemes.

Based on precedent planning decisions in the district (including an extant consent for extra care housing on the former Molson Coors brewery site), Revere Life recommends that the Council draws a distinction between extra care and retirement scheme fallings within different use classes such that the land use classification will determine the requirements for affordable housing provision. Where a proposal falls within Use Class C2, affordable housing obligations should not apply.

The following features of a retirement community or extra care scheme may point to a C2 classification as follows:

- Built Form – the range and quantum of facilities and communal spaces and the design and adaptation of the building and the individual units.
- Allocation and eligibility criteria, including the retention of the C2 use in perpetuity, the minimum age of residents and the level of care cater for (including any minimum care requirements).
- Housing and support provider model – including whether the facility is regulated by the Care Quality Commission and whether care is provided on-site or off-site.

## Local Plan consultation - Land to the east of Downhouse Road and Catherington Lane, PO8 0TX

Wed 11/01/2023 15:58

To: EHDC - Local Plan <LocalPlan@easthants.gov.uk>; easthampshire@public.govdelivery.com <easthampshire@public.govdelivery.com>

Cc: [REDACTED]

📎 1 attachments (1 MB)

Proposed Boundary.pdf;

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

Dear [REDACTED]

Thank you for informing us that the current Local Plan consultation period is soon due to close. We have been instructed by [REDACTED] to request your Council to review the Settlement Policy Boundary in the vicinity of his home.

Planning Practice Guidance reminds us that *"A policies map must illustrate geographically the application of policies in a development plan"* and the National Planning Policy Framework states that *"When defining boundaries...local planning authorities should...define boundaries clearly, using physical boundaries that are readily recognisable and likely to be permanent."*

East Hampshire District Council's on-line interactive map shows the Settlement Policy Boundary (SPB) drawn arbitrarily across the gardens of residences that front Downhouse Road and Catherington Lane, in a manner that does **not** use physical boundaries that are readily recognisable and are therefore **unlikely** to be permanent - there is nothing on the ground in this vicinity to define the boundary between the settlement and the countryside. This anomaly should be remedied by showing the settlement boundary extended to coincide with the residential garden curtilages - as shown in red on the map extract attached.

We would welcome confirmation that the Settlement Policy Boundary will be amended in the manner suggested or, if not, clarification of the steps that may be taken to promote our client's proposal.

Thank you.

Kind regards,

**Robert Tutton Town Planning Consultants Ltd**

23 Romsey Avenue, Fareham, Hampshire, PO16 9TR

T: 01329 825985 F: 01329 230175 E: [REDACTED]

W: [www.planningfareham.co.uk](http://www.planningfareham.co.uk)

---

**From:** [REDACTED]

**Sent:** 11 January 2023 13:57

To: [REDACTED]

Subject: [REDACTED]

[REDACTED]

[REDACTED]

***Robert Tutton Town Planning Consultants Ltd***  
293 Havant Road, Farlington, Portsmouth, Hampshire, PO6 1DD  
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Our ref: [REDACTED]

20 Farringdon Street  
London, EC4A 4AB  
T +44 20 3691 0500

Date: 16 January 2023

Planning Policy  
East Hampshire District Council  
Penns Place  
Petersfield  
Hampshire  
GU21 4EX

Dear Sir / Madam,

**EAST HAMPSHIRE LOCAL PLAN 2021-2040  
ISSUES AND PRIORITIES REGULATION 18 – PART 1  
REPRESENTATION BY BORROW INVESTMENTS LTD**

I am instructed by Borrow Investments Ltd to make a representation upon the Issues and Priorities consultation document. Borrow Investments Ltd is a large landowner in and adjoining the District, notably owning land at Hazleton Farm, Horndean, a large part of which is known as Land East of Horndean (LEOH).

**Background**

Borrow Investments Ltd is broadly in support of the aims of the consultation document, namely to provide the best quality homes in the most sustainable locations, along with objectives to combat climate change and protect and enhance the environment. The document also seeks to improve local facilities and provide employment opportunities.

In particular, Borrow Investments Ltd notes the challenging housing requirements, so as to accommodate the population and demographic needs of the District. Notably, based upon the Government's standard method formula, 9,823 homes are required during the Local Plan period, i.e., up to the year 2040. This equates to 517 homes per year. It is clear that it will not be possible to accommodate this level of housing just through the use of brownfield sites. Inevitably, the release of greenfield sites is required, but as set out within the consultation document, these sites should be in the most sustainable locations.

**Development Strategy**

The consultation document puts forward four options for the distribution of new housing. Borrow Investments Ltd are strongly in favour of Option 2, which states that new development should be concentrated in the largest settlements. Borrow Investments Ltd agree that there is benefit in taking into account where people are likely to travel to meet their everyday needs and to provide more housing in areas that are closer to these destinations. As set on Page 56 of the document, depending on the sites that are selected to deliver this option is good for the following reasons:

- Reducing the need to travel long distances to meet everyday needs
- Accessibility to local employment and training needs
- Meeting affordable housing needs in our largest communities

**Our ref:** [REDACTED]

In particular, Borrow Investments Ltd is supportive of focusing additional housing development in Horndean for the following reasons:

- Horndean is the largest settlement in the Southern Parishes. The Southern Parishes fall within the Planning for South Hampshire (PfSH) sub-area. The PfSH area is significant regionally in accommodating both housing and employment growth and accordingly, has a major role to play in meeting the development requirements of East Hampshire District.
- Horndean is one of the largest settlements in the District, being a Tier 2 settlement. Indeed, Horndean scores highly (25) within the 15-29 range for Tier 2 settlements, as set out in the East Hampshire Settlement Hierarchy Background Paper. In particular, Horndean benefits from a range of services and facilities, including supermarket, GP surgery, secondary and primary schools, community hall and sports pitches.
- Horndean is highly accessible to the rest of the District and to adjoining towns, especially by virtue of the A3 (M).

Accordingly, it is considered appropriate that housing and employment development be directed to Horndean

### **Development Sites**

Borrow Investments Ltd is aware that it is not the purpose of this consultation exercise to identify individual sites for development. However, as explained above, Borrow Investments Ltd own land at Hazleton Farm, Horndean, which has capacity to accommodate growth and which will assist in meeting the broad aspirations of the emerging Local Plan. Notably, the land at Hazleton Farm represents an opportunity to accommodate growth in a Tier 2 settlement. Indeed, through the provision of new housing, along with employment floorspace and community facilities, Land at Hazleton Farm has the potential to enhance the sustainability of Horndean as a settlement.

The Hazleton Farm land is well known to the District Council, as it is the subject of existing and proposed allocations and permissions. For information, the relevant sites are as follows:

Land East of Horndean (LEOH) – Outline planning permission was granted in December 2021 for up to 800 dwellings plus employment land, local centre, primary school and related development. The site is also allocated for development in the adopted Local Plan for 700 dwellings, industrial and business use and new school. The site is now the subject of a reserved matters application, submitted by Bloor Homes. Bloor Homes project to start building new homes on the site by 2024. Accordingly, this land is a committed development site.

Extension to Land East of Horndean (Hazleton Farm) – land to the south of LEOH was included as a potential site within the Large Development Sites (Regulation 18) consultation process that took place in September / October 2019, as part of the now withdrawn Local Plan. Information submitted to the Council at that time demonstrated that the site has the potential to accommodate around 1,000 new homes, along with employment floorspace, a local centre and generous areas of open space. This expansion land is a logical extension to a sustainable settlement. As well as being contiguous with the LEOH site to the north, the land can provide links to both the National Park and to the planned Havant Thicket reservoir to the south

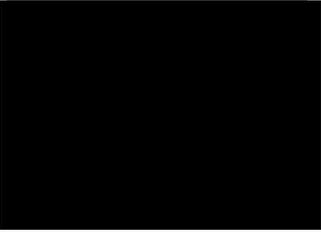
### **Summary**

Borrow Investments Ltd is supportive of the broad objectives of the Issues and Priorities consultation document. Borrow Investments Ltd is strongly in support of Option 2 as a means of delivering more housing in the District's larger settlements. Notably, priority should be given to directing growth to Horndean, the largest settlement in the Southern Parishes. The ability of Horndean to grow in a sustainable manner is well illustrated by the sites at Hazleton Farm, i.e., Land East of Horndean (LEOH) and Extension to Land East of Horndean.

I look forward to receiving updates on the progress of the emerging Local Plan.

Our ref: [REDACTED]

Yours faithfully,





16<sup>th</sup> January 2023

Submitted by email only

20 Western Avenue  
Milton Park  
Abingdon, Oxfordshire  
OX14 4SH  
T +44 1235 821 888

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

Dear Sir/Madam

**Re: Better Homes Better Places East Hampshire Local Plan 2021-2040 Issues and Priorities  
Regulation 18 – Part 1**

I am writing to you to make representations on behalf of the owners of land in Ropley, [REDACTED] and their development partners, Friday Street Developments Ltd. East Hampshire District Council (EHDC) has invited comments on the draft local plan, subject to a deadline for submission of today, 16<sup>th</sup> January 2023. Our comments are set out below.

**Existing Local Plan.**

The current local plan for East Hampshire is the Joint Core Strategy (JCS), which was adopted in June 2014 (more than 8 years ago) and only applies to that part of the district that falls within East Hampshire Local Planning Authority Area. The remainder of the district falls within the jurisdiction of the South Downs National Park. It should be noted that the JCS is more than 5 years old and, according to Government policy in the NPPF, it is out-of-date. Paragraph 11 of the NPPF (updated in 2021), states that

*d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:*

*i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*

*ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.*

In this instance, the development plan is more than 5 years old. It is out-of-date and planning applications for sustainable development, such as new housing, should be granted planning permission, unless the likely adverse impacts would significantly and demonstrably outweigh the benefits.

The new Local Plan seeks to enable the delivery of housing, and other development, in the plan period, which is from 2021 to 2040. However, the time frame for the delivery of the new local plan is elongated and it is unlikely that the JCS will be replaced until September 2025 (according to the council's LDS). This means

## Our ref:

that by the time it is replaced, the JCS will already be 11 years old. The LPA should be moving much more quickly to replace the out-of-date JCS. It should be allocating more resources to the local plan adoption process, so that the plan can be adopted much sooner than the predicted autumn 2025 (almost 3 years from now). All the time that the LPA has an out-of-date local plan, it will be failing in its duty to facilitate new homes, and associated development, to be built for local people who need them now – not in 5, 10 or 15 years.

## Housing Land Supply.

In September 2022, the LPA published the East Hampshire Five-Year Housing Land Supply Position Statement (for the period 2022/23 to 2026/27). This concluded, in paragraph 5.4, that the council could accommodate 2,593 dwellings, compared with a 5-year requirement of 2,714 dwellings, which equates to a provision of **4.78 years** of deliverable housing supply for the period from 1<sup>st</sup> April 2022 to 31<sup>st</sup> March 2027, to meet the currently identified residual Local Housing Need derived by the Standard Method. The Standard Method has to be used, because, as explained above, the current local plan is considerably out-of-date. This is an equivalent **shortfall of 121 dwellings**. However, it is considered that the council has taken an extremely optimistic view with regard to the issue of deliverable housing supply. It is considered that the figure of 2,593 is much too high and optimistic.

A requirement of 2,585 dwellings (517 dwellings per annum (dpa)) has been identified. When a 5% buffer is added, this creates a total requirement of 2,714 dwellings. It is stated that 2,198 dwellings can be provided on large and small sites with planning permission, while 147 dwellings could be provided on sites in Local Plans, 50 will come forward on other identified deliverable sites and a windfall allowance of 114 dwellings has been included. This makes a total of 2,509, plus 84 on C2 developments, making a total of 2,593 (as set out in Appendix K of the 5YHLS update of September 2022).

In any event, Annex 2 of the NPPF states that to be considered deliverable, sites for housing should be available now, offer a suitable location for development now and be achievable with a realistic prospect that housing will be delivered on the site within 5 years. In particular:

*a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within 5 years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).*

*b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within 5 years.*

It is considered that the council's figures for allocated sites, identified deliverable sites and windfalls should not be added to the figure for extant planning permissions, because there is no clear evidence that they will be delivered within the 5-year period, as required by Annex 2 of the NPPF. Therefore, when the much more likely housing delivery figure of 2,198 (sites with extant planning permission) is compared with the requirement to provide 2,714 dwellings (517 plus 5% = 542.85 dpa), this equates to a housing land supply of

## **Our ref:**

just **4.05 years, and a shortfall of 516 dwellings. This is a significant shortfall. The LPA needs to take action now to rectify this most unsatisfactory situation.**

It is considered that, in the context of a considerably out-of-date development plan and a significantly under-achieving 5-year housing land supply, the LPA should be reviewing and updating the whole local plan now and not just “kicking the can down the road” with another meaningless regulation 18 consultation, which does not contain any actual policies, or site allocations. Notwithstanding this strongly held opinion, we seek to address the current draft local plan and its proposed draft policies and questions in the sections below.

## **Better Homes Better Places Consultation**

### **Issue: Population and Housing**

In the absence of an up-to-date Local Plan, the LPA has to abide by the figures contained in the Standard Method provided by the Government, based on 2014 population projections, with an uplift in areas with low affordability. East Hants is a prime example of this situation, where the average dwelling costs 14.51 times the average income. This makes it virtually impossible for people earning average incomes to be able to afford to buy their own homes. In this context, it is important for the LPA to seek to maximise housing delivery, of all tenures, to endeavour to make housing more affordable, especially for younger people who are currently at the bottom of the housing ladder and struggling to save up enough money to put down a deposit on their first home.

#### **1. Population and Housing Consultation questions:**

##### **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.**

This option has been chosen, because it is considered that the LPA should be doing everything in its power to maximise housing delivery. Either of the suggested housing delivery figures, of 632 or 621 per annum, is just too low. There is a pressing need in East Hants to deliver much more high-quality housing for private sale, especially that is suitable for first-time buyers, and shared equity / affordable homes to get families on lower incomes out of temporary accommodation, including hotels, B&B's and HMO's and into good quality, permanent homes.

It is likely that the majority of people who respond to this consultation will say that they don't want the housing delivery figure increased. However, these people will tend to be in older age groups, who have owned their houses for many years, seen them increase in value and they want to protect what they have got. They don't want new development on green fields spoiling the status quo. They don't want their lovely homes devalued (as they see it) or new people moving into their village or town and changing it. They fear change and they have the time and resources to make their opinions known to the people in power, such as planning officers and district councillors, to ensure that no decisions are made that they would not approve of. They are prepared to use their voting power to ensure that members are fearful of losing their seats if they do not get their way.

Our ref:



This photograph (taken from the draft local plan) amply illustrates the point made above, which is that local plans are aimed at an older demographic. The people in the photograph don't need new homes. It's the younger and less comfortable people, who are not in the photograph, who do need new homes and the LPA should be getting them much more engaged in the process. Even if they can't get them involved, because they are working full-time, or they have other priorities, such as bringing up children and earning enough money to pay the rent and heating bills, the LPA should be taking fully into account the needs and requirements of those who don't find it easy to get involved in the planning process.

The council should listen to the people who get involved, but they should also listen to the people who won't write in. Such as, the young people who have yet to get on the housing ladder, who are living with parents or in rented accommodation, while they try to save up for a deposit, while interest rates go up and owning a home becomes even more of a pipe dream than it was. They should also listen to the families on lower incomes, who will never be able to afford to buy a house or flat of their own and they will always be reliant on the provision of affordable housing to have somewhere safe and warm to call home.

These people are the "silent majority". They never get involved in local plan consultations. They never have their voices heard. The LPA should ensure that when listening to the "noisy minority", primarily consisting of older people who are comfortably off, they should ensure that they have at least one ear on what is not being said. There is a desperate need in this country, especially in expensive areas like East Hants, for more good quality homes, especially for younger people and families on lower incomes. The LPA should fully consider the needs of such people, not because they shout loudest during the consultation process, but because they don't.

**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)**

Yes.

**POP2a Please explain your answer.**

As explained above, in answer to POP1a, it is considered that 517 dwellings per annum is a very low figure. There is a pressing need to deliver more housing, including more starter homes for first-time buyers, more

**Our ref:**

self-builds and more affordable dwellings of all types and tenures. The LPA needs to look at ways of increasing housing delivery. It needs to grant more planning permissions, more quickly and it needs to allocate more sites for housing in the short, medium and longer term. Only through the LPA being proactive will the ridiculously high multiplier of 14.51 average earnings be reduced to something more affordable, so that younger and less affluent people can be adequately catered for by the local housing market. The local housing market in East Hants prices out younger and less affluent people, the very people who will not be aware of this plan and will not submit representations. The LPA needs to take action to cater for their needs and not just to respond to the older, more comfortably off residents, who make more noise and therefore, by default, have more say in the local plan process.

**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 some unmet needs, where there may be a direct relationship with the communities of East Hampshire.**

**POP4a Please explain your reasons.**

It is highly likely that most respondents, who live in the district, will say that the LPA should not offer to assist with any requests from neighbouring authorities. This is because, as explained above, they want to maintain the status quo. They don't like change. They don't want new people coming into their towns and villages and making things different. However, we consider that change is good. Enabling more homes to be built in the towns and villages of East Hants will bring new people into the area with disposable incomes who will spend money in local shops, restaurants and cafes, etc. Their children will go to local schools, they will use local services, such as libraries, swimming pools and sports centres, and they will set up new businesses that will employ local people. This investment in the area by bringing in new people, will have a beneficial effect on local businesses and services, making them more viable and better able to withstand the increasing challenges of the modern UK and World economy.

There are some LPAs locally which do not have the land available to meet their own housing needs, such as LPAs with a lot of Green Belt and AONB designations, and they struggle every year to meet their housing targets. One solution to this problem would be to allocate some of their much needed housing numbers to locations with fewer policy and environmental constraints, such as East Hants, which has no Green Belt, for example.

East Hants should approach neighbouring authorities, especially those nearer to London, which have a considerable amount of Green Belt, to see if any of their housing need can be accommodated. There is even a case for taking some overflow from London, where the housing need is the highest and the housing shortfall is the greatest in the UK.

We don't believe that the LPA should offer to meet all unmet needs, with no limit, because that would place too much pressure on local services and infrastructure, but it should be possible to meet some of the needs of highly constrained LPAs. The LPAs that benefit from this should help to pay for the improvements to infrastructure that will be required to facilitate what should not necessarily be seen as a wholly altruistic offer. The other LPAs need to house their people. East Hants can help with this. However, it should not be at

**Our ref:**

major cost to the people of East Hants. It should be a reciprocal arrangement that benefits all parties. This is the only way that it could potentially work to everyone's satisfaction.

In this context, East Hants should add 100 dwellings per annum to its housing target, to allow for taking some of the overflow from nearby LPA's that have genuine need and can make a meaningful contribution to the costs that East Hants will have to bear to bring the additional homes forward. If all relatively unconstrained LPAs like East Hants took this approach, it would make a significant contribution to meeting annual housing land supply figures and it would help to ensure that more new homes are built where people need them.

**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**

**HOU1a Please explain your reasons.**

It is clear from the figures given in the local plan that a significant increase in older people is expected in the plan area in the next 15 years or so. At the moment, most councils do precious little to cater for the ageing population. East Hants could be a proactive leader on this issue by specifically planning for the projected increase in older people, through the implementation of policies that seek to improve facilities for older people and to specifically cater for them in the housing market. This could mean introducing a policy requiring a specific percentage of new homes to be built for older people, such as sheltered housing and smaller dwellings suitable for down-sizing, which would, in turn, free up the larger, family houses they move out of, which will help to meet demand from younger people and families. With this in mind, the LPA could include a policy in the local plan that states that at least 20 or 25% of new homes on all sites of 10 or more dwellings should be suitable for occupation by older people. The types of older person housing, such as sheltered housing, should be described in the policy. However, we do not consider that it would be essential to specifically allocate sites for older people. It would be preferable to seek a percentage of older person housing from each development. We consider that this would be a proven method, in the same way as it has for affordable housing, to provide new homes specifically for older people without harming the housing market in any material way.

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

Yes. It should be made clear in the policy that the needs of the ageing population cannot be ignored indefinitely, and all new developments (of 10 or more dwellings) should seek to make a meaningful contribution to addressing this problem.

**HOU3 Should the Local Plan include a specific policy on adaptable housing? (Y)****HOU4 Should there be a requirement on large sites for a percentage of new homes to be adaptable? (Y)**

**Our ref:**

**HOU4a Please explain your answer.**

As with the ageing population discussed above, there is an increasing need for accommodation for people with mobility issues. There is a growing need for homes that are suitable for occupation by disabled people of all age groups, but particularly those over 65 years of age. Therefore, this issue is combined with the ageing population issue, as discussed above. It is important to ensure that homes built in the future include a percentage that can be used by disabled people, if that is required. New homes should be flexible and adaptable to meet a wide range of needs. For these reasons, it is considered that there should be a policy in the local plan that states that all new developments (of 10 or more dwellings) should include 10% that would be usable by disabled people, either through the provision of particular facilities within them or through future adaptability. This policy would be helpful in ensuring that the future housing needs of an ageing and less mobile population are met in a proactive way.

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

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

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

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

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

**HOU6a Please explain your answer.**

As stated above, in relation to the ageing population, there is an urgent need in East Hants for more homes for smaller households of one and two persons. It is considered that there is an urgent need for more homes in the 1-3 bedroom range, but this option was not given in the question. Increased provision of smaller homes will enable more first-time buyers to get a foothold on the market ladder and it will enable more older people to down-size, moving out of 4-5 bedroom family homes and into more suitable, smaller homes. However, what tends to happen with down-sizers is that they still want at least 2-3 bedrooms, so that their children and grand-children can come to stay for weekends and over school holidays. For this reason, we have selected the 2-3 bedroom option. However, as stated above, we consider that there is a need for more 1-bedroom homes, especially as starter homes for younger people. Only by providing significantly more smaller homes in East Hants will the ridiculously high affordability ratio of 14.51 times income be meaningfully reduced to enable more first-time buyers to get onto the housing ladder.

With regard to the wording of the policy, this should include a requirement for at least 50% of all new homes on developments of 10 or more dwellings to have 3-bedrooms or fewer. This will ensure that at least half of new homes built in the district over the next 15 years or so are potentially affordable for first-time buyers and it will enable more down-sizing, which will, in turn, free up more larger, family-sized homes, meaning that fewer family-sized homes will need to be built in the future.

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

- **Stay the same**

**Our ref:**

**HOU7a Please explain your answer.**

We acknowledge the pressing need for more affordable homes, of all types, sizes and tenures, in the district and beyond. However, if the LPA is relying on market house builders to deliver a significant proportion of new affordable homes, through section 106 agreements, it is important not to increase the percentage requirement above the present level of 40%. This is because placing more of a burden on house builders and private landowners, would threaten the financial viability of these developments. Without financial viability, for the house builders and the landowners selling the land for building, no new housing will be delivered. This does not benefit anyone. The cost of delivering affordable housing as part of a larger development is deducted from the purchase price of the land. If the deductions are too great, the land value will be too low, and the landowners will not sell. If the cost of delivering the affordable housing is too high, the house builders will not build the houses and no housing, either for the market or affordable housing, will be delivered. LPAs need to get the balance right and a 40% requirement has been proven over several years to be an acceptable percentage, to both landowners and house builders. However, for the reasons explained above, the percentage of affordable homes on new housing sites (of at least 10 dwellings) should not be increased and it should remain at no more than 40%.

The policy should, however, make it clear that in situations where the viability of a development is questionable, the percentage of affordable housing on a site can be reduced through negotiation, but only if the developer can successfully prove that financial viability will suffer if the whole 40% affordable housing requirement is provided. This matter should be capable of being addressed on a site-by-site basis.

**Development Strategy consultation question**

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

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

We consider that Option 4 New Settlement is the least favourable of the 4 options, because the larger the site the longer it takes to bring it forward. New Settlement schemes require the acquisition of huge tracts of land, which will inevitably be in multiple ownerships, which will take a long time to pull together. Large schemes require a consortium of developers, as well as landowners, and it takes a lot of time and trouble to create these consortia and get the project moving in the right direction. The larger the site area, the greater the issues, such as flood risk, archaeology, ecology, landscape, etc, which all require detailed surveys to be undertaken and any issues that are found have to be addressed and resolved. Even once planning permission is granted, it still takes a considerable length of time to get development underway, as discharge of conditions, section 106, 278 and 38 agreements, environmental permits, etc need to be drawn up and resolved. Then huge and expensive infrastructure provision needs to happen, such as building roads, railway stations and sewers, before any actual homes can start to be built. For these and many other reasons, it always takes far longer than expected to bring forward new settlements. Any new settlement would not

## **Our ref:**

contribute to the 5-year housing land supply for many years (possibly 10, 15 years or more), while, in the meantime, virtually no new homes would be delivered in the district and the urgent need for new homes would just grow even greater and more serious. For these reasons, a new settlement is the least favoured option.

We consider that Option 2 is the next least favoured option, because, as with the new settlement option considered above, it would involve the putting together and delivery of large sites, such as Sustainable Urban Extensions (SUEs) containing hundreds, or even thousands, of new homes, which would take too long to bring to fruition and would not deliver any actual new homes in any numbers for far too many years into the future. According to the map for Option 2, the 2 main locations for new housing would be Alton and Whitehill/Bordon. Alton has a train station and is connected to the rail network, as well as being close to a main trunk road (A31), while Whitehill/Bordon has neither. Alton has a significant amount of employment, while Whitehill/Bordon has little. The history of Whitehill/Bordon as an army town, which means that much of the land owned by the MoD, is why it is a favoured location by the LPA. However, it is not a very sustainable location in travel and employment terms. This has the result of people living in new homes in Whitehill/Bordon having to commute long distances to work and to other facilities on sub-standard roads through the South Downs National Park. Option 2, which would result in a further concentration of homes in Whitehill/Bordon, would exacerbate this problem even more. For these reasons, concentrating new developments in the largest settlements is the second least favourite option.

We consider that Option 1 is the second favourite option, because it will spread new homes across a wider range of settlements than Options 2 and 4. There is a need for more housing to be provided on smaller sites in smaller settlements, where they can be provided without the massive impacts of larger developments and they can be brought forward using existing infrastructure. Smaller schemes in smaller settlements will help to maintain the viability of the smaller settlements, such as villages like Ropley, where there is a need for an injection of new people to bring their spending power to the village to maintain the village schools, shops, churches, public houses and village halls, which would otherwise wither and die if the population is allowed to stagnate and get ever older and less active, which the LPA acknowledges is the current trend. Building smaller, starter homes, homes for down-sizers and allocating self/custom build plots in and adjoining smaller settlements will help to ensure that these villages and small towns maintain their vibrancy for many years to come. Building a scheme of 5, 10 or 20 dwellings in a smaller village or town could make the difference between the village shop or pub closing down due to lack of custom, and it remaining open to serve its local customers for many years in the future. For these reasons, we consider that dispersing new development to a wider range of settlements, including villages like Ropley, is the second favourite option.

We consider that Option 3 is the most favoured option. Simply allocation overall numbers to each of the 3 parts of East Hants, provides the LPA with the maximum amount of flexibility when it comes to allocating land for housing. For example, it could allocate a large site Whitehill/Bordon in the north-east segment, as suggested by option 2 (see above), which may be its preference. However, in the other segments, it may prefer to allocate smaller sites to smaller settlements, such as Ropley, as suggested in Option 1 (see above). The greater amount of flexibility gives Option 3 the advantage over the other options, in our opinion. For these reasons, we consider that Option 3 is the best option, with Option 1 running it a close second.

**Our ref:**

## **General consultation question**

### **GEN1 How do you feel about this consultation? (Very unhappy).**

The reason for feeling very unhappy is that, on several occasions within the questionnaire, the council states that it does not welcome the submission of any details of any sites for consideration. We consider that this is not acceptable and is a missed opportunity. It has been 3 years since the previous round of consultation, and nothing seems to have moved forward in that time period. With the local plan unlikely to be adopted until 2025, there is a huge void in the LPAs range of documentation. The LPA needs to be much more proactive in bringing forward a new local plan as quickly as possible and ensuring that all development sites get a fair hearing, so that much needed housing can be delivered sooner rather than later in locations such as Ropley.

By saying that landowners and developers should not submit site details, this stifles debate, it prevents the council from moving forward in a timely manner and it just helps to exacerbate the housing crisis in East Hants where someone earning the average salary has to pay 14.51 their income for a dwelling in the district. This is not a sustainable situation. It may suit the noisy minority of older people/comfortable homeowners who will make their opinions known regarding this local plan, but it will not benefit the silent majority of people who cannot get on the housing ladder and cannot afford to live in East Hants, because they are priced out.

The council needs to do more and take positive action to help people to get their feet on the first step of the housing ladder. It needs to enable a much wider range of new homes, including self/custom build homes, for which there is a tangible demand, as well as starter homes and homes for older people, so that they can free up the family-sized homes they are currently living in. Instead of “kicking the can down the road”, as we mentioned earlier, the LPA needs to be dynamic and decisive in driving development forward, rather than being a very heavy brake on development, which is what it generally can be and it is at the moment.

For this reason, this draft local plan should have been much more of an opportunity to put forward ideas, not just at a strategic level, but also at a micro level, in order to bring forward the debate regarding the provision of new homes in a more positive way. It is, we consider, a missed opportunity.

### **GEN2 Is there anything else you would like to tell us in response to this consultation? (please explain).**

Yes, as stated above, we consider that it is a missed opportunity not to allow any new sites to be put forward for consideration as part of this local plan regulation 18 consultation. For this reason, we propose to put forward our clients' sites at Hammonds Lane, Ropley, which we consider is suitable for development and it should be considered for allocation in the next iteration of the draft local plan. Details of the Hammonds Lane, Ropley sites are attached to these representations as **Appendix 1**.

## **Conclusions**

Clearly, the LPA has an out-of-date local plan, and it urgently needs to adopt a new local plan. It also has a sub-standard 5-year housing land supply. Both an out-of-date local plan and less than 5-year housing land supply leave it in a very vulnerable position. Urgent action is needed to bring forward and adopt a new local plan with all haste.

**Our ref:**

And yet, the LPA publishes another regulation 18 consultation, with no policies and no allocations and it specifically says that it does not want details of suitable sites. It is “kicking the can down the road” and putting off any decision-making in the worst possible way. However, the people most likely to participate in the process, the older and more comfortably off, will no doubt say they are happy with this position, because they don’t want new homes ruining their pleasant views or new people clogging up the roads and doctors waiting rooms. The people who need the new homes won’t have their voices heard and nothing will be done to help them onto the housing ladder, which is a ridiculously expensive thing to get on in East Hants.

The LPA needs to allocate more sites for housing as soon as possible. Even once they are allocated, it takes a considerable amount of time to deliver the actual homes on the ground. The larger the sites, the longer the delay, which is why we favour the allocation and delivery of smaller sites in smaller settlements, such as on land at Hammonds Lane, Ropley, which can be brought forward much more quickly.

The publication of, yet another, regulation 18 draft local plan with no policies and no site allocations is a missed opportunity for the council and it needs to take urgent action to bring forward a more meaningful version of the new local plan, so that much needed new homes, of all types and tenures, can start to come forward in numbers sufficient to start pushing down the ridiculously high 14.51 x income multiplier, which is making the housing market in East Hants more and more exclusive, so that younger people have no realistic chance of ever getting on the local housing ladder. Unless the LPA takes some decisive action, this situation will only get worse for many years to come.

We hope that these representations will be given due consideration by the council. Please get in touch with me if you have any queries.

Yours sincerely



RPS Group

**Land at Hammonds Lane, Ropley – LAA/ROP-008 and LAA/ROP-009**

My clients' own two sites in Ropley, known as ROP-008 and ROP-009. The sites are included in the councils Land Availability Assessment (LAA) on the map below:



LAA site details as follows:

**Site ref:** LAA/ROP-008

**Site name:** Land to the west of Hammonds Lane, Ropley

**Site address:** Land to the west of Hammonds Lane, Ropley

**Parish:** Ropley

**Promoted:** Residential/Older persons accommodation/Self build

**Capacity:** 15

**Stage 2 Co:** Included

**Suitability:** Eastern boundary is susceptible to surface water flooding, adjacent to the Ropley Conservation Area, several Listed Buildings nearby,

**Area\_ha:** 2.51

**Availability:** Yes

**Achievability:** Yes

**Timescale:** 0-5 years

**Conclusion:** Developable,

**Additional information:**

**Site ref:** LAA/ROP-009

**Site name:** Land at Hammonds Lane, Ropley

**Site address:** Land at Hammonds Lane, Ropley

**Parish:** Ropley

**Promoted:** Residential

**Capacity:** 20

**Stage 2 Co:** Included

**Suitability:**Part of site susceptible to surface water flooding, part in Groundwater SPZ 2, Cons Areas to the north and south, access via narrow country lane

**Area\_ha:** 3.98

**Availability:** Yes

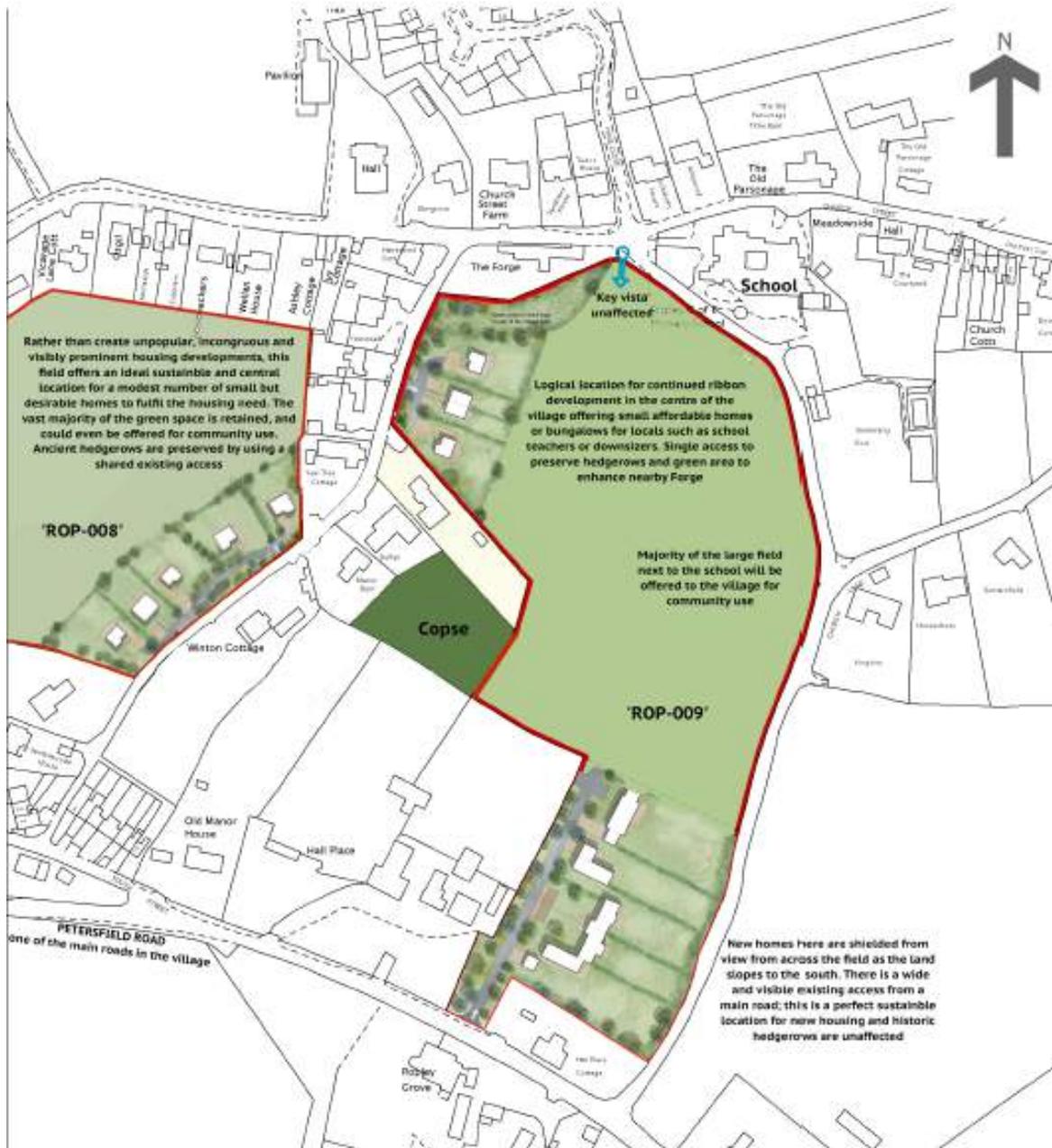
**Achievability:** Yes

**Timescale:** 0-5 years

**Conclusion:** Developable

**Additional information:**

Previously, we have submitted the following outline masterplan proposals:



## Proposals

- ROP-008 is suitable for allocation in the form of about 5 new dwellings in a ribbon of development along the west side of Hammonds Lane. The remainder of the land could be offered to the community as public open space, which will be retained as such in perpetuity.
- ROP-009 is also suitable for allocation in three parts: firstly, a ribbon of affordable open market housing along the eastern side of Hammonds Lane, secondly a small cluster of dwellings at the southern end of the site, with access off Petersfield Road, which will not be visible from the northern end of the site and thirdly, the remainder of the land could be offered to the community as public open space, which will be retained in perpetuity. Retention of the central part of this site as public open space will ensure that any views, from the northern end of the site looking south, are not lost.

## Constraints

The visual impact of development on heritage assets (conservation area and listed buildings nearby) could be mitigated by appropriate landscaping along the relevant site boundaries. In addition, high quality materials could be used in construction to ensure that the new dwellings make a positive contribution to their setting and the setting of heritage assets.

There is a small likelihood of flood risk on the edges of the sites. Both sites are large enough to have capacity to provide SuDS, which will ensure that surface water run-off is no greater than the current greenfield sites. This can easily be secured by the LPA through conditions on any planning consent.

Groundwater can also be safeguarded through engineering works that can be secured by the council and the Environment Agency by means of suitable conditions on any planning consent notice. None of the issues raised in the LAA in relation to these 2 sites are unresolvable.

## Opportunities.

The sites are the most sustainable locations for new housing in Ropley. They are both located in the heart of the village. They will infill areas within the centre of the village, and they will not lead to the encroachment of the village into the surrounding open countryside. New housing on the sites will bring new people and new families into the village. They will have disposable income, which will help to sustain the existing local shop and post office, as well as other local services. Their children are likely to attend the local school, which will help to secure its future.

New housing on the sites will be developed in a sympathetic and unobtrusive manner. New landscaping around the development areas will ensure that, over time, they will assimilate seamlessly into the fabric of the village.

Both sites adjoin the settlement boundary, but from within it, rather than on the edge or beyond the outer limits of the village, like many other alternative sites the council has considered and even permitted in recent years. Sympathetic development of both sites will protect existing vistas and the proposals will create a new, dedicated areas of public open space, together with a play area and potentially a car park right in the heart of the village, which will be right next to the primary school. The benefits of the proposals will be enjoyed by existing residents, as well as future generations.

ROP-009 is immediately adjacent to Ropley Church of England Primary School. My clients' proposals could have the following benefits for the school and, as a result, the wider community:

- The school is an important long term community asset.
- Its continued sustainability needs to be supported wherever possible.
- With a collaborative approach between the school/education authority and the landowners the top north/eastern end of ROP-009 offers long-term potential for new educational teaching facilities.

- In principle, the landowners, with long standing local Ropley family connections, are supportive of sensible initiatives that reinforce the sustainability of the school or dovetail with other community led ideas.

The owners are ready and willing to work closely with the District and Parish Councils to ensure delivery of a scheme that enhances the character of the area and makes a valuable contribution to the housing stock of the village, together with public open spaces that will serve the community in a positive way for decades to come.

#### Recommendation

It is considered that the above sites are available, suitable for much needed local housing development and deliverable in the near future, which will help to meet the district's urgent housing need and to bring forward a package of environmental, social and economic benefits to the village of Ropley, that would otherwise not be delivered.

16<sup>th</sup> January 2023

Submitted by email only

20 Western Avenue  
Milton Park  
Abingdon, Oxfordshire  
OX14 4SH  


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

Dear Sir/Madam

**Re: Better Homes Better Places East Hampshire Local Plan 2021-2040 Issues and Priorities  
Regulation 18 – Part 1**

I am writing to you to make representations on behalf of Vortal Homes Ltd, who have an interest in land at Whitedown Farm, Beech, Alton. East Hampshire District Council (EHDC) has invited comments on the draft local plan, subject to a deadline for submission of today, 16<sup>th</sup> January 2023.

**Existing Local Plan.**

The current local plan for East Hampshire is the Joint Core Strategy (JCS), which was adopted in June 2014 (more than 8 years ago) and only applies to that part of the district that falls within East Hampshire Local Planning Authority Area. The remainder of the district falls within the jurisdiction of the South Downs National Park. It should be noted that the JCS is more than 5 years old and, according to Government policy in the NPPF, it is out-of-date. Paragraph 11 of the NPPF (updated in 2021), states that

*d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:*

*i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*

*ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.*

In this instance, the development plan is more than 5 years old. It is out-of-date and planning applications for sustainable development, such as new housing, should be granted planning permission, unless the likely adverse impacts would significantly and demonstrably outweigh the benefits.

The new Local Plan seeks to enable the delivery of housing, and other development, in the plan period, which is from 2021 to 2040. However, the time frame for the delivery of the new local plan is elongated and it

## Our ref:

is unlikely that the JCS will be replaced until September 2025 (according to the council's LDS). This means that by the time it is replaced, the JCS will already be 11 years old. The LPA should be moving much more quickly to replace the out-of-date JCS. It should be allocating more resources to the local plan adoption process, so that the plan can be adopted much sooner than autumn 2025 (3 years from now). All the time that the LPA has an out-of-date local plan, it will be failing in its duty to facilitate new homes, and associated development, to be built for local people who need them now – not in 5, 10 or 15 years.

## Housing Land Supply.

In September 2022, the LPA published the East Hampshire Five-Year Housing Land Supply Position Statement (for the period 2022/23 to 2026/27). This concluded, in paragraph 5.4, that the council could accommodate 2,593 dwellings, compared with a 5-year requirement of 2,714 dwellings, which equates to a provision of **4.78 years** of deliverable housing supply for the period from 1<sup>st</sup> April 2022 to 31<sup>st</sup> March 2027, to meet the currently identified residual Local Housing Need derived by the Standard Method. The Standard Method has to be used, because, as explained above, the current local plan is considerably out-of-date. This is an equivalent **shortfall of 121 dwellings**. However, it is considered that the council has taken an extremely optimistic view with regard to the issue of deliverable housing supply. It is considered that the figure of 2,593 is much too high.

A requirement of 2,585 dwellings (517 dwellings per annum (dpa)) has been identified. When a 5% buffer is added, this creates a total requirement of 2,714 dwellings. It is stated that 2,198 dwellings can be provided on large and small sites with planning permission, while 147 dwellings could be provided on sites in Local Plans, 50 will come forward on other identified deliverable sites and a windfall allowance of 114 dwellings has been included. This makes a total of 2,509, plus 84 on C2 developments, making a total of 2,593 (as set out in Appendix K of the 5YHLS update of September 2022).

In any event, Annex 2 of the NPPF states that to be considered deliverable, sites for housing should be available now, offer a suitable location for development now and be achievable with a realistic prospect that housing will be delivered on the site within 5 years. In particular:

*a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within 5 years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).*

*b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within 5 years.*

It is considered that the council's figures for allocated sites, identified deliverable sites and windfalls should not be added to the figure for extant planning permissions, because there is no clear evidence that they will be delivered within the 5-year period, as required by Annex 2 of the NPPF. Therefore, when the much more likely housing delivery figure of 2,198 (sites with extant planning permission) is compared with the requirement to provide 2,714 dwellings (517 plus 5% = 542.85 dpa), this equates to a housing land supply of

**Our ref:**

just **4.05 years, and a shortfall of 516 dwellings. This is a significant shortfall. The LPA needs to take action now to rectify this most unsatisfactory situation.**

It is considered that, in the context of a considerably out-of-date development plan and a significantly under-achieving 5-year housing land supply, the LPA should be reviewing and updating the whole local plan now and not just “kicking the can down the road” with another meaningless regulation 18 consultation, which does not contain any actual policies, or site allocations. Notwithstanding this strongly held opinion, we seek to address the current draft local plan and its proposed draft policies and questions in the sections below.

**Better Homes Better Places Consultation**

**Issue: Population and Housing**

In the absence of an up-to-date Local Plan, the LPA has to abide by the figures contained in the Standard Method provided by the Government, based on 2014 population projections, with an uplift in areas with low affordability. East Hants is a prime example of this situation, where the average dwelling costs 14.51 times the average income. This makes it virtually impossible for people earning average incomes to be able to afford to buy their own homes. In this context, it is important for the LPA to seek to maximise housing delivery, of all tenures, to endeavour to make housing more affordable, especially for younger people who are currently at the bottom of the housing ladder and struggling to save up enough money to put down a deposit on their first home.

**1. Population and Housing Consultation questions:**

**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.**

This option has been chosen, because it is considered that the LPA should be doing everything in its power to maximise housing delivery. Either of the suggested housing delivery figures, of 632 or 621 per annum, is just too low. There is a pressing need in East Hants to deliver much more high-quality housing for private sale, especially that is suitable for first-time buyers, and shared equity / affordable homes to get families on lower incomes out of temporary accommodation, including hotels, B&B's and HMO's and into good quality, permanent homes.

It is likely that the majority of people who respond to this consultation will say that they don't want the housing delivery figure increased. However, these people will tend to be in older age groups, who have owned their houses for many years, seen them increase in value and they want to protect what they have got. They don't want new development on green fields spoiling the status quo. They don't want new people moving into their village or town and changing it. They fear change and they have the time and resources to make their opinions known to the people in power, such as planning officers and district councillors, to ensure that no decisions are made that they would not approve of. They are prepared to use their voting power to ensure that members are fearful of losing their seats if they do not get their way.

Our ref:



This photograph (taken from the draft local plan) amply illustrates the point made above, which is that local plans are aimed at an older demographic. The people in the photograph don't need new homes. It's the younger people, who are not in the photograph, who do need new homes and the LPA should be getting them much more engaged in the process. Even if they can't get them involved, because they are working full-time, or they have other priorities, such as bringing up children and earning enough to pay the rent and heating bills, the LPA should be taking fully into account the needs and requirements of those who don't find it easy to get involved in the planning process.

The council should listen to the people who get involved, but they should also listen to the people who won't write in. Such as, the young people who have yet to get on the housing ladder, who are living with parents or in rented accommodation, while they try to save up for a deposit, while interest rates go up and owning a home becomes even more of a pipe dream than it was. They should also listen to the families on lower incomes, who will never be able to afford to buy a house or flat of their own and they will always be reliant on the provision of affordable housing to have somewhere safe and warm to call home.

These people are the "silent majority". They never get involved in local plan consultations. They never have their voices heard. The LPA should ensure that when listening to the "noisy minority", primarily consisting of older people who are comfortably off, they should ensure that they have at least one ear on what is not being said. There is a desperate need in this country, especially in expensive areas like East Hants, for more good quality homes, especially for younger people and families on lower incomes. The LPA should fully take into account the needs of such people, not because they shout loudest during the consultation process, but because they don't. The council should actively engage with social media for the younger age groups to be involved.

**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)**

Yes.

**Our ref:**

**POP2a Please explain your answer.**

As explained above, in POP1a, it is considered that 517 dwellings per annum is a very low figure. There is a pressing need to deliver more housing, including more starter homes for first-time buyers, more self-builds and more affordable dwellings of all types and tenures. The LPA needs to look at ways of increasing housing delivery. It needs to grant more planning permissions, more quickly and it needs to allocate more sites for housing in the short, medium and longer term. Only through the LPA being proactive will the ridiculously high multiplier of 14.51 average earnings be reduced to something more affordable, so that younger and less affluent people can be adequately catered for by the local housing market. The local housing market in East Hants prices out younger and less affluent people, the very people who will not be aware of this plan and will not submit representations. The LPA needs to take action to cater for their needs and not just to respond to the older, more comfortably off residents, who make more noise and therefore, by default have more say in the local plan process.

**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 some unmet needs, where there may be a direct relationship with the communities of East Hampshire.**

**POP4a Please explain your reasons.**

It is highly likely that most respondents, who live in the district, will say that the LPA should not offer to assist with any requests from neighbouring authorities. This is because, as explained above, they want to maintain the status quo. They don't like change. They don't want new people coming into their towns and villages and making things different. However, we consider that change is good. Enabling more homes to be built in the towns and villages of East Hants will bring new people into the area with disposable incomes who will spend money in local shops, restaurants and cafes, etc. Their children will go to local schools, they will use local services, such as libraries, swimming pools and sports centres, and they will set up new businesses that will employ local people. This investment in the area by bringing in new people, will have a beneficial effect on local businesses and services, making them more viable and better able to withstand the increasing challenges of the modern UK and World economy.

There are some LPAs locally which do not have the land available to meet their own housing needs, such as LPAs with a lot of Green Belt and AONB designations, and they struggle every year to meet their housing targets. One solution to this problem would be to allocate some of their much needed housing numbers to locations with fewer policy and environmental constraints, such as East Hants, which has no Green Belt, for example.

East Hants should approach neighbouring authorities, especially those nearer to London, which have a considerable amount of Green Belt, to see if any of their housing need can be accommodated. There is even a case for taking some overflow from London, where the housing need is the highest and the housing shortfall is the greatest in the UK.

We don't believe that the LPA should offer to meet all unmet needs, with no limit, because that would place too much pressure on local services and infrastructure, but it should be possible to meet some of the needs

## **Our ref:**

of highly constrained LPAs. The LPAs that benefit from this should help to pay for the improvements to infrastructure that will be required to facilitate what should not necessarily be seen as a wholly altruistic offer. The other LPAs need to house their people. East Hants can help with this. However, it should not be at major cost to the people of East Hants. It should be a reciprocal arrangement that benefits all parties. This is the only way that it could potentially work to everyone's satisfaction.

In this context, East Hants should add 100 dwellings per annum to its housing target, to allow for taking some of the overflow from nearby LPA's that have genuine need and can make a meaningful contribution to the costs that East Hants will have to bear to bring the additional homes forward. If all relatively unconstrained LPAs like East Hants took this approach, it would make a significant contribution to meeting annual housing land supply figures and it would help to ensure that more new homes are built where people need them.

## **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**

### **HOU1a Please explain your reasons.**

It is clear from the figures given in the local plan that a significant increase in older people is expected in the plan area in the next 15 years or so. At the moment, most councils do precious little to cater for the ageing population. East Hants could be a proactive leader on this issue by specifically planning for the projected increase in older people, through the implementation of policies that seek to improve facilities for older people and to specifically cater for them in the housing market. This could mean introducing a policy requiring a specific percentage of new homes to be built for older people, such as sheltered housing and smaller dwellings suitable for down-sizing, which would, in turn, free up the larger, family houses they move out of, which will help to meet demand from younger people and families. With this in mind, the LPA could include a policy in the local plan that states that at least 20 or 25% of new homes on all sites of 10 or more dwellings should be suitable for occupation by older people. The types of older person housing, such as sheltered housing, should be described in the policy. However, we do not consider that it would be essential to specifically allocate sites for older people. Bungalows for example as a site requirement would be a positive step. It would be preferable to seek a percentage of older person housing from each development. We consider that this would be a proven method, in the same way as it has for affordable housing, to provide new homes specifically for older people without harming the housing market in any material way.

Sites with care for the elderly do need to be site specific as there is an economic minimum site size when providing care. Additionally, such sites cannot financially compete with housebuilders for land, therefore, specific site allocations are essential to bring forward facility care opportunities.

**Our ref:**

Given the chronic need for housing for older people there should be a more relaxed policy approach to this in well located sites, which could potentially be located outside of settlements and where a level of care is provided. So that this distinguishes it from just 'regular' housing for older people.

The Council ought to be more creative in its provision of housing for older people, making sure this is more affordable from various angles (including running costs), and promoting single level accommodation.

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

Yes. It should be made clear in the policy that the needs of the ageing population cannot be ignored indefinitely, and all new developments (of 10 or more dwellings) should seek to make a meaningful contribution to addressing this problem.

**HOU3 Should the Local Plan include a specific policy on adaptable housing? (Y)**

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

**HOU4a Please explain your answer.**

As with the ageing population discussed above, there is an increasing need for accommodation for people with mobility issues. There is a growing need for homes that are suitable for occupation by disabled people of all age groups, but particularly those over 65 years of age. Therefore, this issue is combined with the ageing population issue, as discussed above. It is important to ensure that homes built in the future include a percentage that can be used by disabled people, if that is required. New homes should be flexible and adaptable to meet a wide range of needs. For these reasons, it is considered that there should be a policy in the local plan that states that all new developments (of 10 or more dwellings) should include 10% that would be usable by disabled people, either through the provision of particular facilities within them or through future adaptability. This policy would be helpful in ensuring that the future housing needs of an ageing and less mobile population are met in a proactive way.

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

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

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

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

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

**HOU6a Please explain your answer.**

As stated above, in relation to the ageing population, there is an urgent need in East Hants for more homes for smaller households of one and two persons. It is considered that there is an urgent need for more homes in the 1-3 bedroom range, but this option was not given in the question. Increased provision of smaller homes will enable more first-time buyers to get a foothold on the market ladder and it will enable more older people to down-size, moving out of 4-5 bedroom family homes and into more suitable, smaller homes. However, what tends to happen with down-sizers is that they still want at least 2-3 bedrooms, so that their

**Our ref:**

children and grand-children can come to stay for weekends and over school holidays. For this reason, we have selected the 2-3 bedroom option. However, as stated above, we consider that there is a need for more starter homes for younger people. Only by providing significantly more smaller homes in East Hants will the ridiculously high affordability ratio of 14.51 times income be meaningfully reduced, to enable more first-time buyers to get onto the housing ladder.

With regard to the wording of the policy, this should include a requirement for at least 50% of all new homes on developments of 10 or more dwellings to have 3-bedrooms or fewer. This will ensure that at least half of new homes built in the district over the next 15 years or so are potentially affordable for first-time buyers and it will enable more down-sizing, which will, in turn, free up more larger, family-sized homes, meaning that fewer family-sized homes will need to be built in the future.

**HOU7 The current requirement is that 40% of new homes on qualifying sites are affordable homes.**

**Should the % requirement for affordable homes:**

- **Stay the same**

**HOU7a Please explain your answer.**

We acknowledge the pressing need for more affordable homes, of all types, sizes and tenures, in the district and beyond. However, if the LPA is relying on market house builders to deliver a significant proportion of new affordable homes, through section 106 agreements, it is important not to increase the percentage requirement above the present level of 40%. This is because placing more of a burden on house builders and private landowners, would threaten the financial viability of these developments. Without financial viability, for the house builders and the landowners selling the land for building, no new housing will be delivered. This does not benefit anyone. The cost of delivering affordable housing as part of a larger development is deducted from the purchase price of the land. If the deductions are too great, the land value will be too low, and the landowners will not sell. If the cost of delivering the affordable housing is too high, the house builders will not build the houses and no housing, either for the market or affordable housing, will be delivered. LPAs need to get the balance right and a 40% requirement has been proven over several years to be an acceptable percentage, to both landowners and house builders. However, for the reasons explained above, the percentage of affordable homes on new housing sites (of at least 10 dwellings) should not be increased and it should remain at no more than 40%.

The policy should, however, make it clear that in situations where the viability of a development is questionable, the percentage of affordable housing on a site can be reduced through negotiation, but only if the developer can successfully prove that financial viability will suffer if the whole 40% affordable housing requirement is provided. This matter should be capable of being addressed on a site-by-site basis.

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

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

The LPA should include a policy in the new local plan that seeks to encourage the provision of plots for self-build and custom-build homes, for which there is a proven and urgent need. The LPA has set up a self-build and custom-build register, which is on the council website, and it seeks to collect the details of people

## **Our ref:**

interested in building their own home. However, on the same page of the council website it says the following:

*In preparing this register, we are making no commitment to provide self-build or custom-build plots. Registration does not guarantee that a suitable plot will be identified or made available to you.*

Effectively this means that, although the council is collecting the details of people who would like to build their own homes, it is making absolutely no commitment that it will actually deliver any suitable plots. This is not satisfactory. The LPA needs to make a much firmer commitment to enable more Self/Custom Build plots to be built across the district over the local plan period.

In the context of the Self-build and Custom Housebuilding Act 2015 the duty falls on the local authority to bring forward sufficient permissioned plots to meet the demand on the Council's Self-build and Custom Housebuilding Register

### **The draft Local Plan fails to make suitable provision for Self-build and Custom Housebuilding.**

The Council has a legal duty to keep a Self-build and Custom Housebuilding register of individuals and associations of individuals (i.e. groups) who are seeking to acquire serviced plots of land in its area and to have regard to that register when carrying out its planning, housing, land disposal and regeneration functions. This includes development management decisions and plan-making. Unless exempt, the Council also has a legal duty to grant sufficient 'development permissions' to meet the demand for custom and self-build housing in its area on an annual basis.

The NPPF complements the above legal requirements by asking local planning authorities to plan for the needs of different groups with specific housing requirements as part of their overall housing need and that land with permission is developed without unnecessary delay. Having regard to demand and market signals, the need to plan for people wishing to commission or build their own homes is specifically recognised in this context (NPPF, Paragraphs 60, 61).

The importance of Councils having regard to other market information is underlined in the PPG, which makes it clear that local planning authorities should use the demand data from the registers in their area, supported, as necessary, by additional data from secondary sources, to understand and consider future need for this type of housing in their area. Secondary sources can include data from building plot search websites, enquiries for building plots recorded by local estate agents and surveys of local residents. Demand assessment tools can also be utilised.

The Council has not provided evidence that it has assessed the demand for self-build and custom housebuilding, or that it is meeting its duty under the Act.

Policy relating to Self-build and custom-build housing fails to set out an appropriate strategy for meeting local demand over the plan period and is unlikely to have any practical effect on bringing forward serviced plots on sites, undermining the ability of the Council to meet its statutory duties with regard to self-build and custom housebuilding.

It should be noted that the Levelling Up and Regeneration Bill is currently proceeding through the House of Lords including with the government's tabled amendment NC68 providing clarification for custom and self-

**Our ref:**

build. This removes the phrase *suitable* from the clause: “Duty to grant *sufficient* planning permission for self-build and custom housebuilding.”

The update will read as (italics show the areas affected):

2A (2) An authority to which this section applies must give development permission *for the carrying out of self-build and custom housebuilding on 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. Instead of the current:

2A (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. The amendment also removes clause 2A 6(c) which refers to permissions that *could* include custom and self-build.

Richard Bacon MP had also tabled two amendments, which did not proceed into the current version being reviewed in the Lords, and these were very much in keeping with recommendation five of the recommendations he made in the **2021 Bacon Review**. Bacon’s amendments were:

**NC112** Set out to emphasise the role of companies in building the majority of custom and self-build homes, most of which are commissioned by individuals as opposed to the self-builders physically building the home themselves. NC112 set out that, for the purpose of the legislation, the homeowner must have, “the main input into the full design and layout from the individual or individuals who will be the future occupiers.”

**NC115** This referred to the way that the duty for local authorities to grant sufficient planning permissions for custom and self-build housing was applied. This suggested that development permissions must cite precise numbers of dwellings that fall into the definition of custom and self-build housebuilding and be subject to a precise planning condition or obligation to ensure they are delivered as such. It also required that a council’s register should be cumulative.

This information regarding the progress of the Bill illustrates the “direction of travel” regarding the increasing importance being placed on self-build by the Government. This is a material consideration in the preparation of the Local Plan.

The Plan must comply with the NPPF to assess demand over the plan-period and plan for such demand by **identifying specific sites** for such forms of development.

The Council’s own self-build register also shows demand, but we consider that this significantly underestimates real demand and provides no longer term indication of demand over the plan period.

On the council website is a page of statistics [download \(easthants.gov.uk\)](https://www.easthants.gov.uk) which states that up to 31<sup>st</sup> October 2021, there were 122 individuals on the Self/Custom Build register in East Hants and 56 of them were looking for a plot in Beech. Most of the people (92) on the list were looking for plots suitable for

**Our ref:**

detached houses and most (100) wanted homes with 3 or 4 bedrooms. In this context, it is incumbent on the LPA to allocate more land for Self/Custom build homes to help to meet this evident demand.

There is therefore a strong justification for the allocation of sites for self-build, which are developable and can be brought forward without delay.

The LPA needs to include a policy in the new local plan that encourages the allocation of land and granting of planning permission for Self-Custom Build plots in locations where there is sufficient demand, such as Beech.

**Development Strategy consultation question****DEV1 Please rank these options in order of preference**

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

We consider that Option 4 New Settlement is the least favourable of the 4 options, because the larger the site the longer it takes to bring it forward. New Settlement schemes require the acquisition of huge tracts of land, which will inevitably be in multiple ownerships, which will take a long time to pull together. Large schemes require a consortium of developers, as well as landowners, and it takes a lot of time and trouble to create these consortia and get the project moving in the right direction. The larger the site area, the greater the issues, such as flood risk, archaeology, ecology, landscape, etc, which all require detailed surveys to be undertaken and any issues that are found have to be addressed and resolved. Even once planning permission is granted, it still takes a considerable length of time to get development underway, as discharge of conditions, section 106, 278 and 38 agreements, environmental permits, etc need to be drawn up and resolved. Then huge and expensive infrastructure provision needs to happen, such as building roads, railway stations and sewers, before any actual homes can start to be built. For these and many other reasons, it always takes far longer than expected to bring forward new settlements. Any new settlement would not contribute to the 5-year housing land supply for many years (possibly 10, 15 years or more), while, in the meantime, virtually no new homes would be delivered in the district and the urgent need for new homes would just grow even greater and more serious. For these reasons, a new settlement is the least favoured option.

We consider that Option 2 is the next least favoured option, because, as with the new settlement option considered above, it would involve the putting together and delivery of large sites, such as Sustainable Urban Extensions (SUEs) containing hundreds, or even thousands, of new homes, which would take too long to bring to fruition and would not deliver any actual new homes in any numbers for far too many years into the future. According to the map for Option 2, the 2 main locations for new housing would be Alton and Whitehill/Bordon. Alton has a train station and is connected to the rail network, as well as being close to a main trunk road (A31), while Whitehill/Bordon has neither. Alton has a significant amount of employment,

## **Our ref:**

while Whitehill/Bordon has little. The history of Whitehill/Bordon as an army town, which means that much of the land owned by the MoD, is why it is a favoured location by the LPA. However, it is not a very sustainable location in travel and employment terms. This has the result of people living in new homes in Whitehill/Bordon having to commute long distances to work and to other facilities on sub-standard roads through the South Downs National Park. Option 2, which would result in a further concentration of homes in Whitehill/Bordon, would exacerbate this problem even more. For these reasons, concentrating new developments in the largest settlements is the second least favourite option.

We consider that Option 1 is the second favourite option, because it will spread new homes across a wider range of settlements than Options 2 and 4. There is a need for more housing to be provided on smaller sites in smaller settlements, where they can be provided without the massive impacts of larger developments and they can be brought forward using existing infrastructure. Smaller schemes in smaller settlements will help to maintain the viability of the smaller settlements, such as villages like Beech, where there is a need for an injection of new people to bring their spending power to the village to maintain the village schools, shops, churches, public houses and village halls, which would otherwise wither and die if the population is allowed to stagnate and get ever older and less active, which the LPA acknowledges is the current trend. Building smaller, starter homes, homes for down-sizers and allocating self/custom build plots in and adjoining smaller settlements will help to ensure that these villages and small towns maintain their vibrancy for many years to come. Building a scheme of 5, 10 or 20 dwellings in a smaller village or town could make the difference between the village shop or pub closing down due to lack of custom, and it staying open to serve its local customers for many years in the future. For these reasons, we consider that dispersing new development to a wider range of settlements, including villages like Beech, is the second favourite option.

We consider that Option 3 is the most favoured option. Simply allocation overall numbers to each of the 3 parts of East Hants, provides the LPA with the maximum amount of flexibility when it comes to allocating land for housing. For example, it could allocate a large site Whitehill/Bordon in the north-east segment, as suggested by option 2 (see above), which may be its preference. However, in the other segments, it may prefer to allocate smaller sites to smaller settlements, such as Beech, as suggested in Option 1 (see above). The greater amount of flexibility gives Option 3 the advantage over the other options in our opinion. For these reasons, we consider that Option 3 is the best option, with Option 1 running it a close second.

## **General consultation question**

### **GEN1 How do you feel about this consultation? (Very unhappy).**

The reason for feeling very unhappy is that, on several occasions within the questionnaire, the council states that it does not welcome the submission of any details of any sites for consideration. We consider that this is not acceptable and is a missed opportunity. It has been 3 years since the previous round of consultation, and nothing seems to have moved forward in that time period. With the local plan unlikely to be adopted until 2025, there is a huge void in the LPAs range of documentation. The LPA needs to be much more proactive in bringing forward a new local plan as quickly as possible and ensuring that all development sites get a fair hearing, so that much needed housing can be delivered sooner rather than later in locations such as Beech.

## **Our ref:**

By saying that landowners and developers should not submit site details, this stifles debate, it prevents the council from moving forward in a timely manner and it just helps to exacerbate the housing crisis in East Hants where someone earning the average salary has to pay 14.51 their income for a dwelling in the district. This is not a sustainable situation. It may suit the noisy minority of older people/comfortable homeowners who will make their opinions known regarding this local plan, but it will not benefit the silent majority of people who cannot get on the housing ladder and cannot afford to live in East Hants, because they are priced out.

The council needs to do more and take positive action to help people to get their feet on the first step of the housing ladder. It needs to enable a much wider range of new homes, including self/custom build homes, for which there is a tangible demand, as well as starter homes and homes for older people, so that they can free up the family-sized homes they are currently living in. Instead of “kicking the can down the road”, as we mentioned earlier, the LPA needs to be dynamic and decisive in driving development forward, rather than being a very heavy brake on development, which is what it generally can be and is at the moment.

For this reason, this draft local plan should have been much more of an opportunity to put forward ideas, not just at a strategic level, but also at a micro level, in order to bring forward the debate regarding the provision of new homes in a more positive way. It is, we consider, a missed opportunity.

## **GEN2 Is there anything else you would like to tell us in response to this consultation? (please explain).**

Yes, as stated above, we consider that it is a missed opportunity not to allow any new sites to be put forward for consideration as part of this local plan regulation 18 consultation. For this reason, we propose to put forward our clients site at Whitedown Farm, Beech, which we consider is suitable for development and it should be considered for allocation in the next iteration of the draft local plan. Details of the Whitedown Farm site are attached to these representations as **Appendix 1**.

## **Conclusions**

Clearly, the LPA has an out-of-date local plan, and it urgently needs to adopt a new local plan. It also has a sub-standard 5-year housing land supply. Both an out-of-date local plan and less than 5-year housing land supply leave it in a very vulnerable position. Urgent action is needed to bring forward and adopt a new local plan with all haste.

And yet, the LPA publishes another regulation 18 consultation, with no policies and no allocations and it specifically says that it does not want details of suitable sites. It is “kicking the can down the road” and putting off any decision-making in the worst possible way. However, the people most likely to participate in the process, the older and more comfortably off, will no doubt say they are happy with this position, because they don't want new homes ruining their pleasant views or new people clogging up the roads and doctors waiting rooms. The people who need the new homes won't have their voices heard and nothing will be done to help them onto the housing ladder, which is a ridiculously expensive thing to get on in East Hants.

The LPA needs to allocate more sites for housing as soon as possible. Even once they are allocated, it takes a considerable amount of time to deliver the actual homes on the ground. The larger the sites, the longer the delay, which is why we favour the allocation and delivery of smaller sites in smaller settlements, such as

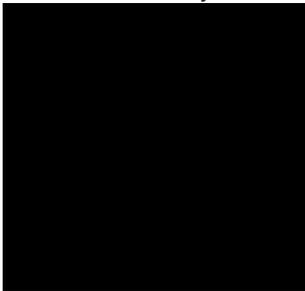
**Our ref:**

Beech, which can be brought forward more quickly. In particular, we consider that allocating more land for self/custom build projects will help to meet a need that is tangible, with 122 families on the waiting list and the council seeming to be taking little or no action to help them into their own homes. This approach is strongly supported by the Government in current and emerging legislation and guidance.

The publication of, yet another, regulation 18 draft local plan with no policies and no site allocations is a missed opportunity for the council and it needs to take urgent action to bring forward a more meaningful version of the new local plan, so that much needed new homes, of all types and tenures, can start to come forward in numbers sufficient to start pushing down the ridiculously high 14.51 x income multiplier, which is making the housing market in East Hants more and more exclusive, so that younger people have no realistic chance of ever getting on the local housing ladder. Unless the LPA takes some decisive action, this situation will only get worse for many years to come.

We hope that these representations will be given due consideration by the council. Please get in touch with me if you have any queries.

Yours sincerely



RPS Group

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# East Hampshire Local Plan 2021-2040

## Regulation 18 Part 1

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Land at Woodcroft Farm Phase 3



## Contents

1.	Introduction	1
2.	Overview of Site and Concept	2
3.	Representations on the Regulation 18 Consultation	8
4.	Conclusions	11



## 1. Introduction

- 1.1. This document provides representations on behalf of Grainger Plc to East Hampshire District Council (EHDC) on the Regulation 18 Issues and Priorities (Reg 18) consultation. The Local Plan is at Regulation 18 public consultation page and is due for adoption in 2025. The Regulation 18 consultation provides details of how the future policies will be prepared, with associated questions to seek the public's view on relevant Issues and Options.
- 1.2. Grainger Plc acknowledges that this Regulation 18 consultation is not exclusive from those undertaken in 2019 and that EHDC has considered previous comments and representations in its preparation. Whilst it is understood this consultation explicitly states not to resubmit information on sites previously submitted, this introduction provides a short record of Grainger Plc's submissions in relation to Land at Woodcroft Farm Phase 3. The second chapter of the submission provides information regarding the site to confirm the future intent of promotion at the second stage of the Regulation 18 consultation, with the third chapter of the submission responding directly to the Issues and Options contained within the current Regulation 18 Issues and Priorities consultation.
- 1.3. Grainger Plc has been actively promoting Land at Woodcroft Farm Phase 3 for development and has made representations to the EHDC Draft Local Plan 2017 – 2036 Reg 18 consultation (March 2019), along with attending a meeting with the Parish Council in August 2021 to discuss the details of how the site may be delivered. The site was previously included as a draft allocation within a former consultation document (Site SA37).
- 1.4. EHDC has undertaken a number of different Regulation 18 consultations in support of an emerging Local Plan but has felt it necessary to undertake a revised consultation due to the changes in national policy and guidance since 2019. Grainger Plc acknowledges that the consultation draft of the revised National Planning Policy Framework (NPPF) was published on 22 December 2022, with consultation running until 2 March 2023. The consultation draft is currently high-level amendments to the NPPF to which limited weight can be afforded. Should the amendments be implemented Grainger Plc will respond accordingly in the later stages of the Local Plan consultation.

## 2. Overview of Site and Concept

- 2.1. Land at Woodcroft Farm Phase 3 measures approximately 8.2 hectares and lies to the north of the Wecock Estate and to the west of James Copse Road. The site is bounded to the west by Clarendon Farm (Winchester District), to the north by a Byway Open to All Traffic (BOAT) and James Copse, and to the east by existing residential development. To the south, the site is bounded by an approved residential development for 288 dwellings (Havant Borough).
- 2.2. The site consists of open paddock land, with mature vegetation on the boundaries. There is a group of mature trees within the central area of the site. These features are common within the area and were incorporated into the approved layout to the south within Havant Borough.
- 2.3. Land at Woodcroft Farm Phase 3 is located in the very south of the East Hampshire district, directly adjacent to the administrative boundary of Havant Borough. The site abuts the existing developed area, consisting of the suburban residential dwellings of an area known as Wecock Farm. The site is currently grazing land and can be considered available in the early part of the new Local Plan Period. The land is suitable for housing as demonstrated by the previous draft allocation (Site SA37), is deliverable and viable for development, in accordance with the aims of the National Planning Policy Framework (NPPF).

**Figure 2.1: Location Plan**



- 2.4. The settlements of Horndean and Waterlooville lie a short distance to the north and south respectively, with the site directly adjacent to, and accessed via, the residential site of Catherington Park which is currently

under construction by Linden Homes. Catherington Park is a 288-unit scheme approved in 2015 by Havant Borough Council (Ref: APP/13/00804), with development taking place in three distinct phases. Linden Homes is delivering the first 160 units, whilst Vistry is delivering Phase 2 which contains 128 units.

- 2.5. The approved site layout for the Catherington Park development is shown at Figure 2.2, with vehicular access provided by a new access road off Eagle Avenue. This road has been designed to serve both the 288 units approved and future development on the land at Woodcroft Farm Phase 3 within East Hampshire District.

**Figure 2.2: Approved site layout for Catherington Park (Ref: APP/13/00804)**



- 2.6. Both sites at Woodcroft Farm have been promoted through the separate local plan processes of Havant and East Hampshire over recent years in the context of a joint approach and prospective dual allocations reflecting a single development entity in a sustainable location. Key site benefits of Woodcroft Farm Phase 3 include:

- The site lies within Flood Zone 1
- The site is outside of the South Downs National Park designation
- The site is not within a Conservation Area nor adjacent to any listed buildings
- There are no SINCS, SSSIs or local wildlife sites within the boundary
- The site itself is clear of any specific landscape designations (e.g., ancient woodland, registered park and garden)
- Vehicular access to the site is already in existence from Eagle Avenue as part of Catherington Park.

- 2.7. Considering these benefits in more detail, the site lies directly adjacent to the current administrative boundary with Havant Borough Council and taking the site forward for development would result in a logical

extension of suburban residential development, without having a detrimental impact on open countryside. As shown on Figure 2.1, it would see the urban area of Wecock extended as well as providing an opportunity for a good sized development at an appropriate density, helping to meet the identified housing need of the District.

- 2.8. The site was included in the 2021 EHDC Land Availability Assessment (LAA) (site ref: LAA/JD-024). This states that the site has the potential for a capacity of 164 residential dwellings and concludes that the site is available, achievable, and developable within a timescale of 0-5 years.
- 2.9. Whilst the current Sustainability Appraisal (SA) published as part of the Local Plan consultation does not include detail of sites, the previous SA published in 2019 to accompany the Draft Local Plan considered the site as being a 'stand out site' which performs notably well against sustainability criteria.
- 2.10. Looking at other site benefits, the site is in Flood Zone 1 meaning that residential development is an acceptable use in principle from a flood risk perspective. Having a relatively flat topography and a number of natural features (e.g., mature landscape buffer to all boundaries, ancient woodland of James Copse to the east, and residential development to the south) also means that the site will be able to form appropriate relationships with both adjoining residential development and the natural environment.
- 2.11. The site is relatively unconstrained in terms of designations as it is not in a Conservation Area, is not adjacent to any listed buildings, nor does it contain any SINC or SSSI land within the development boundary. There are no specific landscape designations on the site itself, although the site is capable of accommodating areas of open space and enhancing existing landscape buffers, including those with the adjacent ancient woodland to the east at James Copse.
- 2.12. As noted in paragraph 2.2, the site will be surrounded by residential development on two sides and therefore makes a logical settlement boundary revision, a principle that was previously included in the EHDC Draft Local Plan Proposals Map.

### Indicative Masterplan

- 2.13. The indicative masterplan for the land is based on a detailed understanding of the site, physical constraints, and surrounding context. This has been prepared to demonstrate that the level of development proposed can comfortably be accommodated on site. An extract from the plan is reproduced overleaf at Figure 2.3. A fundamental factor is the positive relationship with the development to the south and the adjacent ancient woodland. A further plan extract at Figure 2.3 shows this in more detail.
- 2.14. From a landscape perspective, Grainger Plc appreciates that the site is currently located within the countryside and outside of the defined settlements of Havant and Horndean, as detailed in Policy CP2 of the adopted East Hampshire Local Plan. The site benefits from mature landscaping both within the centre of the site and also on all boundaries. The indicative masterplan would retain all of these natural features, creating a development density that would be entirely appropriate to the surroundings.
- 2.15. Taking reference from the scheme approved to the south by Havant Borough Council, the site capacity has been formed on the premise that the predominant form of dwellings will be houses, with the potential for some smaller flatted units. A range of house types and sizes will be achievable within the site.

- 2.16. A principal feature of the illustrative layout concerns a new central green space, which would connect to a wider network of other green spaces located to the south within the Catherington Park development. Designing this new green space around the central area of the site allows for existing landscape features to be retained whilst also creating a new facility for future and existing residents on both development sites to use.
- 2.17. The masterplan, as shown in Figure 2.3, has been informally presented to the Council.

**Figure 2.3: Illustrative Masterplan**



- 2.18. The approach to mirroring the perimeter block approach utilised to the south within Havant, would allow for active frontages, which in turn promotes natural surveillance of streets and spaces and security through the development. Parking at a level in accordance with local parking standards would be provided through a combination of on-plot parking and small parking courtyards, are required.
- 2.19. In terms of massing, it is assumed that buildings will be no more than three storeys in height to respond to local context.

### Consultation on Design Issues

- 2.20. In August 2021, informal consultation on design issues was undertaken by EHDC for sites that were in contention for including in the then emerging Regulation 19 Local Plan. Grainger Plc presented a revised high-level masterplan to the Parish Council for comment as part of EHDC's consultation process.
- 2.21. A series of comments were provided by the Parish Council which focused on the importance of any development in this location seeking to enhance access to the adjacent public footpath connections, create a development that is considerate of the adjacent ancient woodland, seeks to enhance the on-site ecology and create distinct areas of open space.
- 2.22. Grainger Plc is in the process of reviewing the illustrative masterplan on the basis of the Parish Council comments and recent technical survey work, including an ecology report. Further discussions with EHDC will be had with regards to the masterplan following the completion of this work.

### Highways/ Transport Connectivity

- 2.23. It is possible for vehicular access to be provided at two points from within the Catherington Park development to the south; the first at the eastern boundary, and the second within the centre of the site along the southern boundary. Both vehicular connections would adjoin roads designed to accommodate the level of traffic expected from the East Hampshire site. It is anticipated that these vehicular access points are supplemented by additional pedestrian access points along the southern boundary, improving the connectivity between the two sites and the surrounding area, enabling easy access to green spaces and the surrounding public footpath network.
- 2.24. Discussion with Hampshire County Council (HCC) Highways would be necessary to confirm that the proposed access points offer the most appropriate solution for the development, however HCC noted in the supporting evidence base document 'Draft Local Plan Sites Highways Assessment' published in 2019 in support of the Draft Local Plan that "*The development plans show the site accessed via a corridor of land running across Woodcroft Lane and continuing southwards alongside the western boundary of the Meadowlands School playing fields terminating at Eagle Avenue. This access road is currently under construction with approximately 60m already built including the junction with Eagle Avenue. It is assumed that this new road will provide the access point for the proposed development, so no further highway assessment has been undertaken.*"
- 2.25. The site lies in close proximity (walking distance – less than 800m) to the Wecock Village and Lovedean Local centres that offer a range of shops and community facilities. Bus stops on Eagle Avenue (approx. 500m from the furthest point of the site) provide direct links to supermarkets, Havant bus and rail stations and Portsmouth and Southsea. There are two primary schools within 800m (Woodcroft Primary School and Rachel Madocks School), whilst Cowplain Community School (secondary) lies within 1km to the south off Hart Plain Avenue.
- 2.26. As such, development at the site would fully accord with paragraph 110 of the NPPF that seeks to ensure that, when allocating land for development, appropriate opportunities for sustainable modes of transport can be taken up, safe and suitable access to a site can be achieved and any impacts on the highways network can be satisfactorily and cost effectively mitigated.



- 2.27. With regards to car parking, given the site size of over eight hectares, there is sufficient space to meet EHDC residential parking standards and the indicative masterplan would comfortably achieve this with a mix of on-plot and off-plot parking spaces.
- 2.28. The site therefore represents a sustainable location that is close to local services and facilities, meaning occupants would not have to rely on vehicles to access these, in full accordance with paragraph 11 of the NPPF that details the overall presumption in favour of sustainable development for plan-making and allocating development sites.

### 3. Representations on the Regulation 18 Consultation

- 3.1. This section sets out Grainger Plc's principal comments on the draft East Hampshire Issues and Priorities Regulation 18 Part 1 Local Plan (2021-2040) Consultation document.

#### Population and Housing – Standard Methodology

- 3.2. Grainger Plc supports the principle of the Local Plan looking to meet the identified local housing need and directing development to the most sustainable and accessible locations. The use of the standard method is also supported, although it is noted that the actual housing policies contained within the emerging Local Plan would include a slightly lower level to account for parts of the District in the National Park (which is subject to separate local policies).
- 3.3. In 2017 the Government published a number of key documents relating to future housing need and growth within the UK. This was supported in September 2017 by the 'Right Homes in the Right Places' consultation, which included a new standardised methodology for calculating the Objectively Assessed Need (OAN) for every Local Planning Authority (LPA) in the country. Following the consultation, the calculation was accepted, and has become known as the standard method for housing need.
- 3.4. The National Planning Policy Framework (NPPF), revised in 2021 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.”* (Paragraph 61)
- 3.5. And
- “Strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period.”* (Paragraph 66)
- 3.6. The use of the standard method as the basepoint for the housing requirement in the emerging Local Plan is welcomed, although it should be emphasised that this is a minimum housing figure, and uplifts to provide sufficient flexibility or to account for non-implementation or lapse rates of existing consents should be included.
- 3.7. The Planning Practice Guidance (PPG) clearly states that the standard method identifies a minimum annual **housing need figure** and that this differs from a housing requirement figure (Paragraph 002 ID Reference: 2a-002-20190220). The PPG continues by stating: *“The government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. 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).

- 3.8. As a result, in response to Question POP1, Grainger Plc feels that the standard method should be used for calculating the housing need as the basis for determining the requirements against which the five-year housing land supply and Housing Delivery Test are measured, but that additional uplifts to provide flexibility and allow for non-implementation of sites should be considered.

### Population and Housing – South Downs National Park

- 3.9. In relation to the South Downs National Park Authority (SDNPA) the consultation document notes that 115 dwellings per annum (dpa) are required in the parts of East Hampshire which fall within the National Park. The SDNPA is in the process of preparing an evidence base in support of at Local Plan Review. The latest Authority Monitoring Report (AMR), published in December, indicated that the authority was able to meet its Local Plan housing target in years 2014/15-2019/20, and only fell short in the monitoring year 2020/21 due to the impacts of the Covid-19 pandemic.
- 3.10. Therefore, whilst currently the SDNPA does not have an unmet need in relation to its housing targets, this may change following revisions to the standard methodology, updated Local Plans and housing policies in other neighbouring authority areas, and updates to affordability ratios or household projections between the current consultation and adoption of the new EHDC Local Plan. Therefore, Grainger Plc feels that the Local Plan should contain sufficient flexibility to provide any unmet need from the SDNPA should this arise over the next few years.

### Population and Housing – Unmet Need

- 3.11. Partnership for South Hampshire (PFSH) formally agreed to enter into a Statement of Common Ground (SoCG) between the ten member authorities in September 2020. The first iteration of the SoCG was published in October 2021 and set out an anticipated shortfall of 12,896 dwellings across all ten authorities for the period 2021-2036. PFSH is currently in the process of updating its SoGC, in which the 2022 revision sets out an unmet need of 19,865 dwellings for the period of 2022-2036.
- 3.12. This clearly demonstrates that there is anticipated to be a significant unmet within the PFSH area of nearly 20,000 dwellings by 2036. However, it is also important to note the increase in the estimated unmet need between the publications in October 2021 and November 2022, where the unmet need increased by approximately 7,000 unmet dwellings in a one-year period. This therefore indicates that the situation is worsening rather than improving, and it is more important than ever for authorities within the PFSH to accommodate more unmet need.
- 3.13. Furthermore, in the latest publication from PFSH it is recognised that only two authorities in the area (Fareham and Test Valley) are currently able to demonstrate a surplus in housing supply between 2022 and 2036, with Winchester currently showing as breaking even. Whilst it is only a snapshot at the current time, it reflects that there are limited opportunities within the PFSH area to provide the unmet need.

- 3.14. It is therefore imperative that the local authorities which are able to assist with the unmet need from the PfSH area look to do so. In response to question POP4, Grainger Plc feels that EHDC should offer to assist with some unmet needs, where there may be a direct relationship with the communities of East Hampshire. This is particularly in relation to the southern areas of the District which are part of the PfSH sub-area.

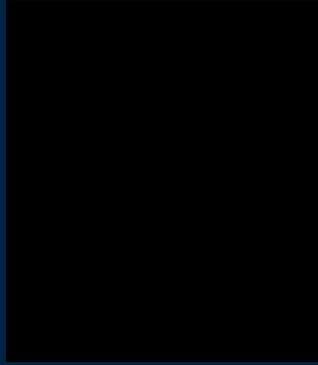
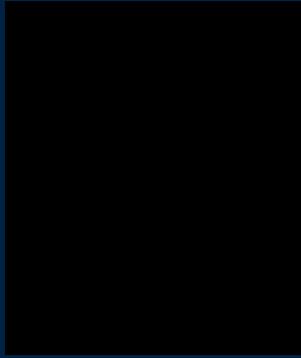
### Development Options

- 3.15. Grainger Plc supports Development Option 1 (Disperse new development to a wider range of settlements) and Option 3 (Distribute new development by population) put forward in the Regulation 18 consultation.
- 3.16. Option 1 holds the biggest emphasis on increasing walking and cycling as modes of transport, and this aligns with the Council's climate emergency and the support for sustainable transport within the NPPF. Furthermore, the delivery of multiple sites across the authority area provides the following benefits:
- Ensures development is proportionate to the sustainability of the settlement
  - Allows for the delivery of some small brownfield sites within the smaller villages
  - Is more likely to see a consistent delivery of dwellings across the Plan Period
  - Allows for choice in location across the authority area for new residents
  - Provides homes within or close to existing settlements to allow for people to change their property type (for example first time buyers or downsizers) whilst staying within the area they currently live
- 3.17. The development of a single large development of 1,500 dwellings, put forward as Option 4, would likely take a significant number of years following adoption of the plan before delivery of dwellings. This would also not maximise choice and competition in the market, as nearly half of the 3,405 homes required over the plan period would be delivered within a single location.
- 3.18. The options put forward in the Regulation 18 consultation appear to cover all potential solutions to the distribution of development, therefore Grainger Plc has no further suggested options.



## 4. Conclusions

- 4.1. This representation has been prepared by Savills, on behalf of Grainger Plc in response to the East Hampshire Local Plan Regulation 18 Issues and Options Consultation. In submitting these representations, Grainger Plc wishes to set out in the strongest possible terms its support for EHDC to plan positively for the delivery of housing in sustainable locations.
- 4.2. The Land at Woodcroft Farm Phase 3 has the capacity to deliver around 170 to 180 dwellings and was previously included as a draft allocation within a former consultation document (Site SA37). Grainger Plc's aspiration is to create a layout which responds to and enhances the site's ecological characteristics, creating a strong sense of identity and allowing the surrounding nature and landscape to form an integral part of the development.
- 4.3. The site therefore represents a sustainable location that is close to local services and facilities, meaning occupants would not have to rely on vehicles to access these, in full accordance with paragraph 11 of the NPPF that details the overall presumption in favour of sustainable development for plan-making and allocating development sites. The ability of the site to meet accepted criteria of sustainability requirements was recognised in the previous Draft Allocation of the site in former consultation versions of the Plan.
- 4.4. Grainger Plc wishes to be kept informed as work on the draft plan progresses to Submission version stage and would welcome a meeting with EHDC officers to discuss any of the comments made in these representations.



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# East Hampshire Local Plan 2021-2040 Regulation 18 Part 1

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Land North of Woodcroft Farm Phase 3



## Contents

1.	Introduction	1
2.	Overview of Site and Concept	2
3.	Representations on the Regulation 18 Consultation	6



## 1. Introduction

- 1.1. This document provides representations on behalf of Grainger Plc to East Hampshire District Council (EHDC) on the Regulation 18 Issues and Priorities (Reg 18) Consultation on a site Land North of Woodcroft Farm Phase 3 ('the site'). The Local Plan is at Regulation 18 public consultation stage and is due for adoption in 2025. The Regulation 18 consultation provides details of how the future policies will be prepared, with associated questions to seek the public's view on relevant Issues and Options. EHDC has undertaken a number of different Regulation 18 consultations in support of an emerging Local Plan, but has felt it necessary to undertake a revised consultation due to the changes in national policy and guidance since 2019.
- 1.2. Grainger Plc understands that the purpose of this consultation is to focus on the Issues and Options presented in the current consultation, with a stage 2 version of the document to be consulted on in relation to site allocations later in the process. This document provides an overview of Land North of Woodcroft Farm Phase 3, which has not previously been promoted for development, but is now available to be promoted.
- 1.3. This document will provide a response to the Issues and Options contained within the current Regulation 18 consultation, and will provide additional information in support of the inclusion of Land North of Woodcroft Farm Phase 3 as a future allocation within the emerging Local Plan. The information provided within section 2 of this document should be considered in the context of the EHDC Call for Sites.



## 2. Overview of Site and Concept

- 2.1. Land North of Woodcroft Farm Phase 3 measures approximately 9.5ha and lies directly to the north of the site named Land at Woodcroft Farm which is also being promoted by Grainger. The site lies to the north of the Wecock Estate and to the west of James Copse Road. Woodcroft Farm is bounded to the west by Clarendon Farm (Winchester District), to the south by an approved residential development for 288 dwellings (Havant Borough), and to the east by existing residential development.
- 2.2. The site consists of open paddock land, with mature vegetation on the boundaries. There is a group of mature trees within the central area of the site.
- 2.3. Land North of Woodcroft Farm Phase 3 is located in the very south of East Hampshire district, close to the administrative boundary of Havant Borough. The site abuts Land at Woodcroft Farm Phase 3, which is also being promoted by Grainger for residential development, and in turn this lies adjacent to existing developed areas, consisting of the suburban residential dwellings of an area known as Wecock Farm. The site is currently grazing land/ paddock, and can be considered available in the early part of the new Local Plan Period.

Figure 2.1: Location Plan



- 2.4. The settlements of Horndean and Waterlooville lie a short distance to the north and south respectively, with the site close to the residential site of Catherington Park which is currently under construction by Linden Homes. Catherington Park is a 288 unit scheme approved in 2015 by Havant Borough Council (Ref: APP/13/00804), with development taking place in three distinct phases.
- 2.5. It is proposed for access to the site to be provided via Land at Woodcroft Farm Phase 3 and Catherington Park to the south. This will create a cohesive, sustainable new neighbourhood at Woodcroft Farm which demonstrates that the land is suitable for housing due to its sustainable location, close to existing residential developments.
- 2.6. The site is deliverable and viable for development, in accordance with the aims of the National Planning Policy Framework (NPPF).
- 2.7. Both Land at Woodcroft Farm Phase 3 and Land North of Woodcroft Farm Phase 3 are put forward for allocation in the emerging Local Plan, with the potential for dual allocations reflecting a single development entity in a sustainable location. Key site benefits of a new neighbourhood at Woodcroft Farm include:
- The site lies within Flood Zone 1
  - The site is outside of the South Downs National Park designation
  - The site is not within a Conservation Area nor adjacent to any listed buildings
  - There are no SINCs, SSSIs or local wildlife sites within the boundary
  - The site itself is clear of any specific landscape designations (e.g. ancient woodland, registered park and garden)
- 2.8. At this early stage in the promotion, an Indicative Masterplan has not been prepared for the site, however it is recommended a density of around 25 - 30 dwellings per hectare (dph) would be most appropriate, taking into account the size of the site, the existing site features, and the location.
- 2.9. It may also be possible to provide environmental mitigation within the site, if necessary, and subject to the final quantum of dwellings brought forward.
- 2.10. Taking reference from the scheme approved to the south by Havant Borough Council at Catherington Park and with consideration to the character of the wider area, the site capacity has been formed on the premise that the predominate form of dwellings will be houses, with the potential for some smaller appropriately designed flatted units to meet housing mix requirements. A range of house types and sizes will be achievable within the site.

### Highways/ Transport Connectivity

- 2.11. It is possible for vehicular access to be provided via Land at Woodcroft Farm Phase 3, and this would be specifically designed to accommodate the level of traffic and trip rates anticipated from the site. It is anticipated that this access would also provide cycle and pedestrian connectivity.
- 2.12. The site lies in relatively close proximity to the Wecock Village and Lovedean Local centres that offer a range of shops and community facilities. Bus stops on Eagle Avenue, provide direct links to supermarkets, Havant bus and rail stations and Portsmouth and Southsea. There are two primary schools within 1km of

the site (Woodcroft Primary School and Rachel Madocks School), whilst Cowplain Community School (secondary) lies to the south off Hart Plain Avenue.

- 2.13. As such, development at the site would fully accord with paragraph 110 of the NPPF that seeks to ensure that when allocating land for development, appropriate opportunities for sustainable modes of transport can be taken up, safe and suitable access to a site can be achieved and any impacts on the highways network can be satisfactorily and cost effectively mitigated.
- 2.14. With regards to car parking there is sufficient space within the site to meet EHDC residential parking standards and it is anticipated this would include a mix of on plot and off plot parking spaces.
- 2.15. The site therefore represents a sustainable location that is close to local services and facilities, meaning occupants would not have to rely on vehicles to access these, in full accordance with Paragraph 11 of the NPPF that details the overall presumption in favour of sustainable development for plan-making and allocating development sites.

### Ecology

- 2.16. An ecological appraisal has been undertaken to establish an ecological baseline for the site and to determine potential Important Ecological Features (IEF) that could be impacted by future development.
- 2.17. The proposed development site comprises an area of poor semi-improved grassland with mature tree lines. The site is located adjacent to two non-statutory designated sites, James Copse and Outlier SINC to the east and James Paddock SINC to the north.
- 2.18. The report identifies that development of the site would require appropriate mitigation in relation to the loss of priority woodland and hedgerow habits and protected species including foraging badgers, bat species, breeding birds and reptiles. Mitigation will also be necessary in relation to the loss of semi-improved grassland, priority woodland and hedgerow habitat.
- 2.19. The conclusions and recommendations set out within the report will inform future development considerations. Grainger is committed to promoting a development that fully considers all environmental and ecological constraints relevant to the site and understands the requirements for ensuring the provision of Biodiversity Net Gain and meeting Nutrient Neutrality requirements for any development.

### 3. Representations on the Regulation 18 Consultation

- 3.1. This section sets out Grainger's principal comments on the draft East Hampshire Issues and Priorities Regulation 18 Part 1 Local Plan (2021-2040) Consultation document.

#### Population and Housing – Standard Methodology

- 3.2. Grainger supports the principle of the Local Plan looking to meet the identified local housing need and directing development to the most sustainable and accessible locations. The use of the standard method is also supported, although it is noted that the actual housing policies contained within the emerging Local Plan would include a slightly lower level to account for parts of the District in the National Park (which is subject to separate local policies).
- 3.3. In 2017, the Government published a number of key documents relating to future housing need and growth within the UK. This was supported in September 2017 by the 'Right Homes in the Right Places' consultation, which included a new standardised methodology for calculating the Objectively Assessed Need (OAN) for every Local Planning Authority (LPA) in the country. Following the consultation the calculation was accepted, and has become known as the standard method for housing need.
- 3.4. The National Planning Policy Framework (NPPF), revised in 2021 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." (Paragraph 61)*

And

*"Strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period." (Paragraph 66)*

- 3.5. The use of the standard method as the base-point for the housing requirement in the emerging Local Plan is welcomed, although it should be emphasised that this is a minimum housing figure, and uplifts to provide sufficient flexibility or to account for non-implementation or lapse rates of existing consents, should be included.
- 3.6. The Planning Practice Guidance (PPG) clearly states that the standard method identifies a **minimum annual housing need figure** and that this differs from a housing requirement figure (Paragraph 002 ID Reference: 2a-002-20190220). The PPG continues by stating: *"The government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. 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).

- 3.7. As a result, in response to Question POP1, Grainger feels that the standard method should be used for calculating the housing need as the basis for determining the requirements against which the five-year housing land supply and Housing Delivery Test are measured, but that additional uplifts to provide flexibility and allow for non-implementation of sites should be considered.

### Population and Housing – South Downs National Park

- 3.8. In relation to the South Downs National Park Authority (SDNPA), the consultation document notes that 115 dwellings per annum (dpa) are required in the parts of East Hampshire which fall within the National Park. The SDNPA is in the process of preparing an evidence base in support of a Local Plan Review. The latest Authority Monitoring Report (AMR), published in December, indicated that the authority was able to meet its Local Plan housing target in years 2014/15-2019/20, and only fell short in the monitoring year 2020/21 due to the impacts of the Covid-19 pandemic.
- 3.9. Therefore, whilst currently the SDNPA does not have an unmet need in relation to its housing targets, this may change following revisions to the standard methodology, updated Local Plans and housing policies in other neighbouring authority areas, and updates to affordability ratios or household projections between the current consultation and adoption of the new EHDC Local Plan. Therefore Grainger feels that the Local Plan should contain sufficient flexibility to provide any unmet need from the SDNPA should this arise over the next few years.

### Population and Housing – Unmet Need

- 3.10. PfSH formally agreed to enter into a Statement of Common Ground (SoCG) between the 10 member authorities in September 2020. The first iteration of the SoCG was published in October 2021 and set out an anticipated shortfall of **12,896 dwellings** across all 10 authorities for the period 2021-2036. PfSH is currently in the process of updating its SoCG, in which the 2022 revision sets out an unmet need of **19,865 dwellings** for the period of 2022-2036.
- 3.11. This clearly demonstrates that there is anticipated to be a significant unmet need within the PfSH area of nearly 20,000 dwellings by 2036. However, it is also important to note the increase in the estimated unmet need between the publications in October 2021 and November 2022, where the unmet need increased by approximately 7,000 unmet dwellings in a one year period. This therefore indicates that the situation is worsening rather than improving, and it is more important than ever for authorities within the PfSH to accommodate more unmet need.
- 3.12. Furthermore, in the latest publication from PfSH it is recognised that only two authorities in the area (Fareham and Test Valley) are currently able to demonstrate a surplus in housing supply between 2022 and 2036, with Winchester currently showing as breaking even. Whilst it is only a snapshot at the current time, it reflects that there are limited opportunities within the PfSH area to provide the unmet need.

- 3.13. It is therefore imperative that the local authorities which are able to assist with the unmet need from the PfSH area look to do so. In response to question POP4, Grainger feels that EHDC should offer to assist with some unmet needs, where there may be a direct relationship with the communities of East Hampshire. This is particularly in relation to the southern areas of the district which are part of the PfSH sub-area.

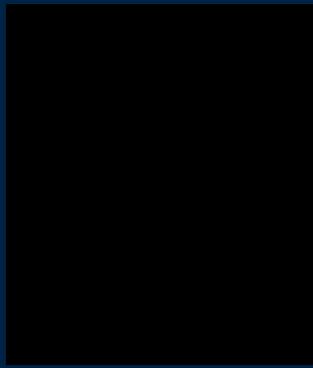
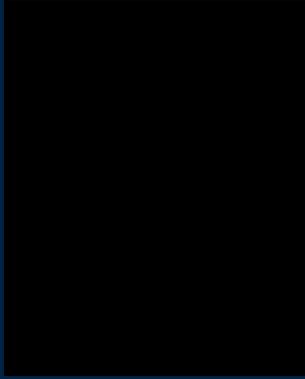
### Development Options

- 3.14. Grainger supports Development Options 1 (Disperse new development to a wider range of settlements) and 3 (Distribute new development by population) put forward in the Regulation 18 consultation.
- 3.15. Option 1 holds the biggest emphasis on increasing walking and cycling as modes of transport, and this aligns with the Council's climate emergency and the support for sustainable transport within the NPPF. Furthermore, the delivery of multiple sites across the authority area provides the following benefits:
- Ensures development is proportionate to the sustainability of the settlement
  - Allows for the delivery of some small brownfield sites within the smaller villages
  - Is more likely to see a consistent delivery of dwellings across the Plan Period
  - Allows for choice in location across the authority area for new residents
  - Provides homes within or close to existing settlements to allow for people to change their property type (for example first time buyers or downsizers) whilst staying within the area they currently live
- 3.16. The allocation of the site Land North of Woodcroft Farm Phase 3 would assist with achieving the aims of Option 1, as it is more sustainable to adjoin a development to existing residential sites (Land at Woodcroft Farm) to create a cohesive and high quality new neighbourhood, which promotes sustainable transport methods.
- 3.17. The development of a single large development of 1,500 dwellings, put forward as Option 4, would likely take a significant number of years following adoption of the plan before delivery of dwellings. This would also not maximise choice and competition in the market, as nearly half of the 3,405 homes required over the plan period would be delivered within a single location.
- 3.18. The options put forward in the Regulation 18 consultation appear to cover all potential solutions to the distribution of development, therefore Grainger has no further suggested options.



## 4. Conclusions

- 4.1. This representation has been prepared by Savills, on behalf of Grainger Plc in response to the East Hampshire Local Plan Regulation 18 Consultation. In submitting these representations, Grainger Plc wishes to set out in the strongest possible terms its support for EHDC to plan positively for the delivery of housing in sustainable locations.
- 4.2. The Land North of Woodcroft Farm Phase 3 has the ability to deliver a sustainable residential development, with the potential to include some mitigation depending on the final quantum of dwellings. Grainger's aspiration is to create a layout which responds to and enhances the site's ecological characteristics, creating a strong sense of identity and allowing the surrounding nature and landscape to form an integral part of the new neighbourhood at Woodcroft Farm. Should the site be considered favourable for future development, continued promotion of the site would be carried out alongside the larger development of Land at Woodcroft Farm
- 4.3. The site represents a sustainable location that is close to local services and facilities, meaning occupants would not have to rely on vehicles to access these, in full accordance with paragraph 11 of the NPPF that details the overall presumption in favour of sustainable development for plan-making and allocating development sites.
- 4.4. Grainger wishes to be kept informed as work on the draft plan progresses to the Submission version stage, and would welcome a meeting with EHDC officers to discuss whether continued promotion of this site would be supported in principle.



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# Representations to Regulation 18 Consultation

## East Hampshire District Council

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Chawton Park, East Hampshire

Prepared for: Harrow Estates

# Representations to Regulation 18 Consultation

East Hampshire District Council

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## Contents

1.	Introduction	1
2.	Representations on the draft East Hampshire Local Plan	3
3.	Conclusion	21

## 1. Introduction

- 1.1. These representations, prepared by Savills on behalf of Harrow Estates, are made on the East Hampshire District Council (EHDC) Regulation 18 Issues and Priorities (Reg 18) consultation. Harrow Estates acknowledges that this Regulation 18 consultation is not exclusive from those undertaken in 2019 and that EHDC has considered previous comments and representations in its preparation. Whilst this consultation explicitly states not to resubmit information on Large Development Sites previously submitted, this introduction provides a short record of Harrow Estates submissions.
- 1.2. Harrow Estates has made representations to all the stages of consultations below and has been proactive in extensively engaging with stakeholders, Parish Councils, Alton Town Council as well as EHDC Officers to ensure that there are no technical reasons why the promoted site at Chawton Park Farm should not be considered at the next stage of consultation. Harrow Estates notes that on 28 June 2021 EHDC published that, following extensive site assessment work and the Large Site Consultation, Chawton Park Farm was considered as the most sustainable area to develop, with links to Alton's transport infrastructure, services and facilities. The representations included response to:
  - The EHDC Draft Local Plan 2017 – 2036 Reg 18 consultation March 2019
  - The EHDC Large Development Sites Reg 18 consultation October 2019
- 1.3. As part of the Large Development Sites consultation, Harrow Estates submitted the following technical information in support of Chawton Park Farm:
  - Heritage Note (Pegasus, October 2019)
  - Landscape Value Addendum to 2018 Landscape Capacity Study (Tyler Grange)
  - Transport Feasibility Report (Calibro, October 2019)
  - Vision Document (Savills, 2019)
- 1.4. Harrow Estates does not seek to revisit previously submitted information or representations. These representations will consider the issues and priorities raised by EHDC and feedback accordingly.
- 1.5. Harrow Estates recognises that housing is a key issue and priority for EHDC. The National Planning Policy Framework (NPPF) guides how strategic policies should set an overall strategy and make provision for housing as part of sustainable development. Harrow Estates considers that a mix of housing sites, including large development sites, will be required to deliver the required quantity of housing over the Plan period until 2040. As a result, adoption must be made before the end of 2025 to ensure that the Plan covers the minimum period of 15 years required by Paragraph 22 of the NPPF. Paragraph 22 also sets out that where larger scale developments form part of a strategy, policies should be set within a vision that looks further ahead. Harrow Estates endorses that this informs how EHDC seeks to address its identified housing need as part of a long-term approach to placemaking and the Climate Emergency. Harrow Estates considers that the work previously undertaken by EHDC as part of the 2019 Regulation 18 consultations and as part of the updated Sustainability Assessment of the Strategic Site Options form a suitable basis for this approach.

- 1.6. Harrow Estates notes that in September 2022 EHDC published its Five-Year Housing Land Supply Position Statement. As of 1 April 2022, EHDC can demonstrate a housing land supply of 4.78 years. Harrow Estates considers that it is paramount for EHDC to control future delivery through an up-to-date local plan being adopted within the timescales currently proposed. Should timescales slip, EHDC puts itself at risk of being unable to control the intention behind the plan of allocating sustainable development throughout the district which make a significant contribution to climate change and the delivery of infrastructure.

## Matters relevant to CPF allocation

- 1.7. On 28 June 2021 EHDC published that, following extensive site assessment work and the Large Site Consultation, Chawton Park Farm was considered as the most sustainable area to develop, with links to Alton's transport infrastructure, services and facilities. This Spatial Strategy Preferred Option was presented at the EHDC Planning Policy Committee meeting on 6 July 2021, at which the recommendation for a spatial strategy option including Chawton Park Farm was carried: "*Members note the different spatial options for the EHDC Local Plan 2017-2038 and approve the preferred option (Option 2) for the spatial strategy to feature in the emerging East Hampshire Local Plan.*"
- 1.8. At the EHDC Council meeting on 23 September 2021 an amendment to that recommendation was accepted that removed the 'preferred' wording. It was resolved that Members: "*APPROVE the different spatial options for the EHDC Local Plan 2017-2038 for further technical consideration.*"
- 1.9. The consultation draft of the revised National Planning Policy Framework was published 22 December 2022, with consultation running until 2 March 2023. The consultation draft is currently high-level amendments to which limited weight can be afforded. If proposed amendments are subsequently implemented these will be acknowledged by the promotion at a later stage.



## 2. Representations on the draft East Hampshire Local Plan

### Overall response to Regulation 18 Issues and Priorities Phase 1 East Hampshire Local Plan 2040.

- 2.1. This section sets out Harrow Estates principal comments on the draft East Hampshire Issues and Priorities Regulation 18 Part 1 Local Plan (2021-2040).
- 2.2. For clarity, where questions require selection of an option, the chosen option has been shaded green and we have responded to the questions as necessary.

#### **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.”*

Very Happy	Happy	Neutral	Unhappy	Very Unhappy
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- 2.3. Overall, Harrow Estates is supportive of the vision which demonstrates a proactive approach to planning for the climate emergency and recognises the mutual need to tackle climate change whilst delivering accessible new homes and healthy inclusive communities, evidenced by the following extract on page 3 of the consultation document which 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.” (Paragraph 1, page 3)**
- 2.4. To achieve the above, it is implicit that the Plan seeks to identify an optimised spatial strategy that not only delivers homes in sustainable locations, but which would also satisfy the higher threshold of delivering homes in the most sustainable locations to ensure that development is as sustainable as possible.
- 2.5. Whilst Harrow Estates supports this aspiration it is noted that the terms do not replicate the aspirational threshold of the Plan. It is therefore suggested 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 provide our communities with green and welcoming places to live, work and play and **maximise our response** to the climate emergency.”*
- 2.6. Furthermore, the omission of Homes for All or “a front door for everyone” which, as page 11 states was in a previous version, is considered a major omission from the Vision. It is considered that when the strategic objectives for the draft Local Plan are developed for the stage 2 Regulation 18 consultation that Homes for All is incorporated.
- 2.7. For example, Homes for All is fundamental in providing a Welfare and Wellbeing Strategy which lists a number of priorities on page 9 but is silent with respect to housing and its contribution to the strategic objectives of the health provider’s Living Well objectives. This is evidenced by the Hampshire’s Health and Wellbeing strategy (2019–2024) (Hampshire Health and Wellbeing Board, 2020), which outlines

# Representations to Regulation 18 Consultation

East Hampshire District Council



several local health priorities relating to ‘starting well’, ‘living well’, ‘ageing well’ and ‘dying well’. The strategy recognises that to achieve the ambitions outlined and improve the health of the whole population, a collaborative approach to addressing wider social and economic determinants of health needs to be actioned. Specifically, by advocating for more affordable and well-designed housing that can meet individuals’ varying needs; promoting accessible design in housing; tackling homelessness. It is considered that these factors could all be encompassed under the Homes for All strategic objective.

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

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

2.8. As explained above the Vision should include the “*front door for everyone*” objective as in the previous draft version of the Vision as well as maximising the response to climate change.

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

Yes	No
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### **VIS3a Please explain your answer**

2.9. The areas of the district being planned for should be set out and justified in the spatial planning/policy chapter of the Local Plan supported by robust technical studies.

### Comments on Issues and Priorities Overview

2.10. As explained in the introduction the key issues listed as the areas of significant change since the last consultation in 2019 are not new issues and were indeed key issues in the last Reg 18 plan. The time elapsed since 2019 and the delay in plan making has just made the need to provide an up-to-date Local Plan to tackle these issues even more acute with population rising, affordability worsening, the emergence of the energy crisis, climate change and the rising cost of living.

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

Least Important				Most Important

2.11. Harrow Estates considers *all of the above key issues to be of high importance* and that it is oversimplifying to rank these issues. It is essential to provide development 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.

# Representations to Regulation 18 Consultation

East Hampshire District Council

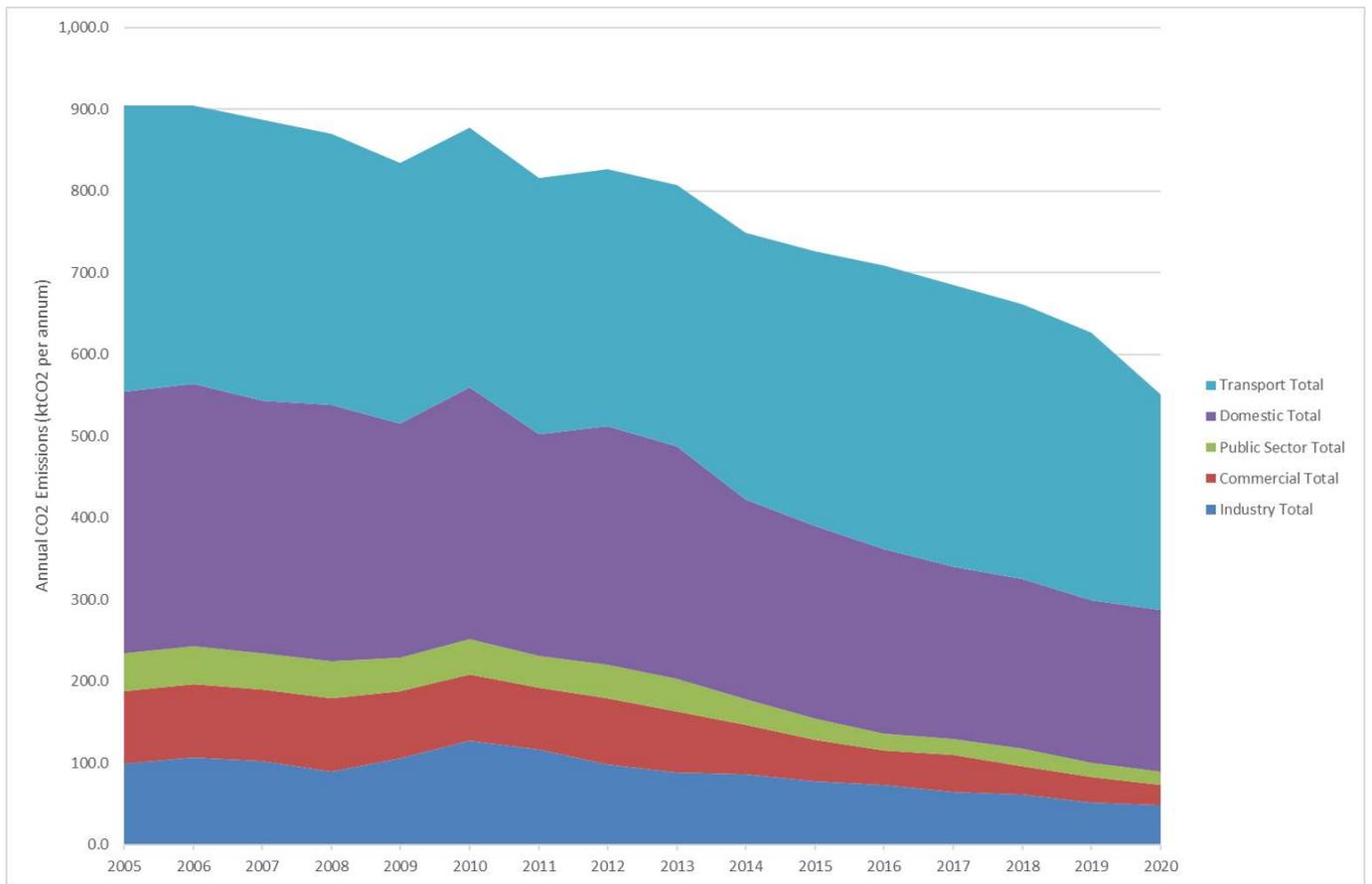


**CLIM1, do you agree that new development should avoid any net increase in greenhouse gas emissions, wherever practicable?**

Yes	No
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2.12. Harrow Estates does support the statement set out at question CLIM1 but as shown on Figure 1 below, greenhouse gas emissions within East Hampshire arise from a range of sources and the Local Plan and associated development strategies should aim to address not just emissions from buildings but also emissions from industry and transportation. In practice this will mean commitments to net zero carbon new buildings, effective retrofit strategies and moving away from fossil fuelled vehicle use which should all play a critical part in how the Council appropriately respond to its declared climate emergency. However, it is accepted that effective retrofit strategies are outside the remit of the Local Plan.

**Figure 1: East Hampshire District greenhouse gas emissions from all sources**



# Representations to Regulation 18 Consultation

East Hampshire District Council



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

<b>Most Important</b>	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 trees and other green infrastructure could play an important role in reducing flood risks
	That the construction of new buildings should use less fossil fuels and more recycling of materials
<b>Least Important</b>	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

- 2.13. Harrow Estates emphasises the importance that the above issues are not considered in isolation due to their interacting factors. For example, it is not possible to build net zero carbon buildings without renewable energy provision, and this cannot be done in a resource efficient manner without reduced carbon emissions from construction materials and processes. It is also perfectly possible to reduce water consumption by the specification of water efficient fixtures and fittings and to reduce the impact of flooding through good design of green infrastructure and sustainable drainage systems. These are key pillars of good environmental design and should be thoroughly addressed in the emerging Local Plan policies.
- 2.14. Further, the benefits of trees and green infrastructure extend beyond impact on flood risk and cover a range of environmental and social benefits such as carbon sequestration and living well.
- 2.15. It is also important to note that, through good design and urban planning, the greenhouse gas emissions from transportation can also be reduced by encouraging active travel, providing access to local services and amenities, and through the delivery of low carbon public transportation.
- 2.16. The Local Plan's definition of development that minimises greenhouse gas emissions and other impacts on the environment and is adaptable to the changing climate needs to include all of these factors.

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

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

- 2.17. Whilst the statement of 'net zero carbon' development is intended to minimise carbon dioxide emissions; the associated policy should tackle this through reducing energy consumption. From 2035, the Government is planning to decarbonise the national electricity grid. To achieve this goal, there will be a substantial increase in low carbon generating capacity, with production well above the current demand for electricity (peak: <50 GW; total: 330 TWh p.a.). The Committee on Climate Change's 6<sup>th</sup> Carbon Budget (which has been largely embraced by the Government) envisages approximately 40 GW of offshore wind, 40 GW of solar, 20 GW of onshore wind and 10 GW of nuclear power by 2035, on the way to possibly 200 GW of



low-carbon generation by 2050 (BEIS, Modelling 2050 – electricity system analysis [December 2020]). The strategy assumes and relies on the electrification of heating and transport, to make the most of the decarbonisation of electricity. The increase in renewable energy in the national grid means that all electrically powered development will be decarbonised as the grid is decarbonised. Electrifying heat means (in effect) heat pumps for the majority of new buildings, although other low carbon heat sources may be available through the use of waste heat from industrial processes, biomass and potentially green hydrogen in future. Heat pumps are most practical in buildings with high fabric efficiency to reduce the demand for energy in the first place. The scale of peak heat demand resulting from wholesale electrification of homes is so much greater than current electricity demand, that highly efficient buildings are essential to avoid electrified heating overwhelming the electricity system in cold weather. Reliance on an abundance of green electricity could also lead to wasteful energy usage if energy, rather than carbon, reduction measures are not secured. This is in line with the industry recognised 'energy hierarchy', which promotes demand and consumption reduction through efficient fabric and systems before the deployment of renewables. It is easier to build new buildings to a high efficiency standard than it is to achieve high efficiency through retrofitting existing buildings. Planning authorities can play a vital role in making the UK ready for the electrification of heat by requiring high standards of fabric efficiency in all new builds. It is also beneficial to differentiate between the following terms, as the language used in the consultation document does not do so:

- Energy demand is the energy required to provide a service and is not linked to the system providing it. For example, the demand for heating energy can be reduced through the specification of good passive design measures.
- Energy consumption is what you would read on an energy meter and accounts for the efficiency of the systems providing the energy. In this instance, an efficient heat pump system would reduce energy consumption.
- Carbon emissions are what results from energy consumption and will be dependent on the carbon intensity of the fuel. As electricity is being decarbonised through increased deployment of renewable technology, carbon emissions in operation are reduced even if consumption remains the same.

2.18. In order to achieve 'net zero carbon emissions' from new development, some form of renewable energy generation is likely to be required. Renewable energy generation should be sought on or near to sites wherever possible to minimise transmission losses, acknowledging that the highest efficiencies and greatest viability may not be provided by building mounted solutions. Increased deployment of decentralised renewable generation also has the potential to reduce local energy consumption and thereby also reduce energy bills.

2.19. It is also not possible, currently, to include embodied carbon emissions in the definition of 'net zero carbon' development, unless significant offsetting measures are included. It is therefore recommended that measures to assess and reduce embodied carbon are addressed elsewhere in Local Plan policies.

***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	No
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# Representations to Regulation 18 Consultation

East Hampshire District Council



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

2.20. Harrow Estates recognises that the energy hierarchy is a well-established methodology for tackling carbon emissions from new buildings, however, notes that the proposed EHDC hierarchy does not include all relevant measures. The below text more accurately describes this:

- Be lean: use less energy and manage demand during operation.
- Be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly.
- Be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site.
- Be seen: monitor, verify and report on energy performance.

2.21. As previously stated, emissions relating to construction materials and processes do not relate to the operational emissions from new development and as such should be treated separately.

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

	Yes	No
In the emerging East Hampshire Local Plan		
In future neighbourhood plans		
In local design codes.		

## **CLIM5a Please explain your answer**

2.22. Harrow Estates considers that detailed criteria for tackling climate change should be specified in the emerging Local Plan, without repetition or duplication in neighbourhood plans or design codes. The climate emergency is a global issue, which should be addressed directly within Local Plan policy and strategy.

## **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
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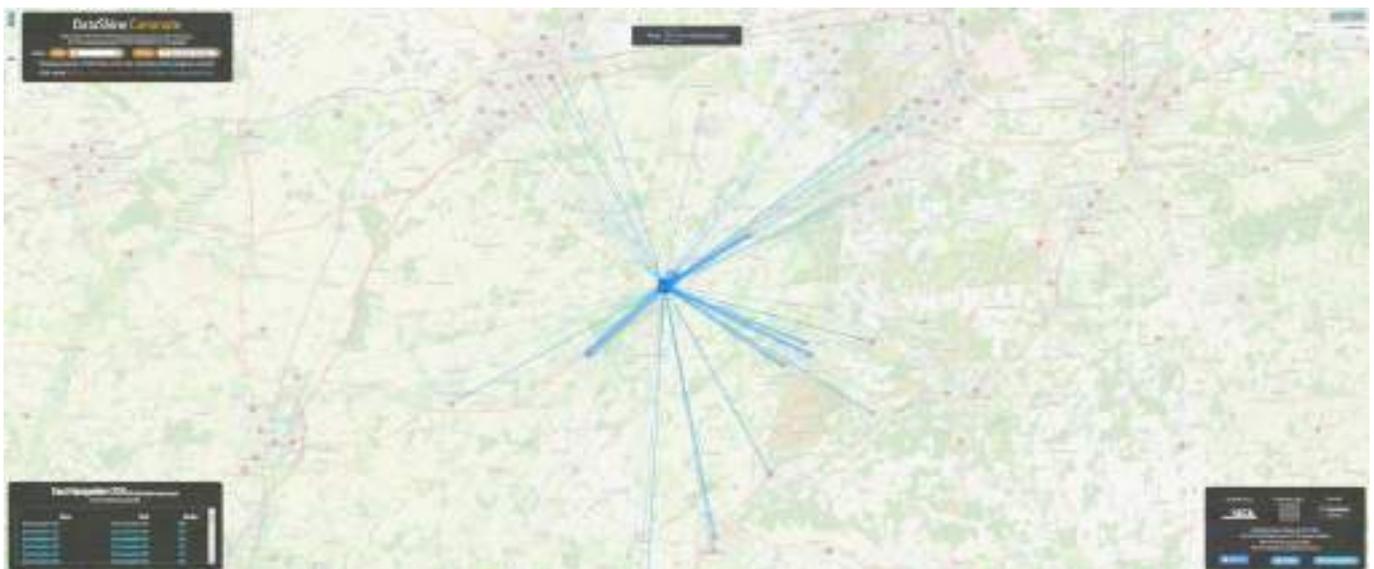
## **CLIM6a Please explain your response**

2.23. Harrow Estates supports the concept of living locally, however does not support a hierarchy of settlements solely based on the 20-minute neighbourhood concept. Whilst Harrow Estates accepts that the concept should form an important component in the selection of individual sites, it considers that the 20-minute principle does not form a suitable basis on which to determine the settlement hierarchy and by implication to inform the future spatial distribution of development throughout the district.

2.24. Indeed, to do so would ignore the complex spatial interactions between settlements both within the district and beyond, the effect of which could be to increase the need to travel, especially by car, increasing otherwise avoidable emissions and adding to highway congestion, contrary to both national policy and the objectives and vision of the emerging Plan.

- 2.25. Moreover, Harrow Estates considers that the approach to determining 20-minute neighbourhoods is overly simplistic and runs the significant risk of underplaying areas where there is an opportunity to deliver material gains in support of the Council's vision. Conversely, it is considered that the currently proposed revised methodology would actively work against the vision and objectives of the plan so as to render the Plan unsound.
- 2.26. To provide context, Alton is evidenced to be the largest employment centre within the district, and it is reasonable to assume, based on previous employment strategies and need assessments, that further growth will be identified for the town through the emerging employment strategy. This will serve to further compound its relative importance as an employment destination within the district and in the sub-region. Indeed, the strategic influence of Alton is clearly evidenced in the below Flow Graph (Figure 2) which shows the relative number of journeys travelling to Alton from surrounding areas.

**Figure 2: Alton Transport Flow Graph**



- 2.27. Figure 2 clearly illustrates the significant number of commuter trips that travel to Alton from other settlements within the district, including places such as Whitehill & Bordon and Petersfield.
- 2.28. Indeed, Alton is of such significance that it attracts a workforce from beyond the district boundary such that the issue of proximity in a more holistic sense, considering potential vehicle kilometres and emissions savings, should be taken into account in order to ensure the vision and objectives of the Plan are met.
- 2.29. Harrow Estates is therefore of the view that there remains a clear, measurable and material benefit in sustainability and climate terms to locating development as close as possible to existing foci of economic activity.

# Representations to Regulation 18 Consultation

East Hampshire District Council



## Public Transport Connections

2.30. Harrow Estates would also draw attention to 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.

## Site Specific Analysis

2.31. Harrow Estates considers the 20-minute neighbourhood analysis to be appropriate at the time of identifying potential allocation sites, when such analysis would also enable consideration of the positive impact it may play on the 20-minute neighbourhood calculation by reference to the scale of development and its potential to deliver a range of on-site land-uses and facilities. Such facilities may then not only ensure that any new development is delivered in compliance with 20-minute neighbourhood principles but that such amenities are able to deliver conditions to enable some existing parts of the settlement to become 20-minute neighbourhoods.

2.32. In this context, such development would offer disproportionate benefits to the climate emergency and net zero agenda, and which would therefore reinforce the soundness of the Plan. Conversely, to ignore such opportunities would, in light of that the climate emergency is the central component of the Plan, undermine its soundness.

2.33. To illustrate the point, GIS-based analyses have been undertaken of the proposed allocation at Chawton Park Garden Village in Alton. In this regard, the analyses identify the number of households that would lie within a 15-minute walk or cycle of three types of existing local amenities – primary schools, convenience stores and a GP Surgery. The analyses have then been updated with the addition of development at the proposed allocation site assuming that additional facilities in each category are delivered. The results are provided below:

**Table 1: GIS Accessibility Modelling**

Extent of Accessible Neighbourhood	Convenience Store			GP Surgery			Primary School		
	Existing	Future	Change	Existing	Future	Change	Existing	Future	Change
<b>15mins</b>	49.80%	55.90%	<b>+6.10%</b>	33.80%	40.30%	<b>+6.50%</b>	48.00%	54.00%	<b>+6.00%</b>
<b>20mins</b>	67.90%	76.30%	<b>+8.40%</b>	59.30%	65.10%	<b>+5.80%</b>	61.40%	66.20%	<b>+4.80%</b>

2.34. It is therefore evident that any spatial distribution or selection of individual sites must have regard for the potential opportunity to create betterment for existing communities whilst also having regard to the potential scale of such development to facilitate delivery of such local amenities. The currently proposed settlement hierarchy and spatial strategy ignores this.

## 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

- 2.35. In 2017 the Government published a number of key documents relating to future housing need and growth within the UK. This was supported in September 2017 by the 'Right Homes in the Right Places' consultation, which included a new standardised methodology for calculating the Objectively Assessed Need (OAN) for every Local Planning Authority (LPA) in the country. Following the consultation, the calculation was accepted, and has become known as the standard method for housing need.
- 2.36. The National Planning Policy Framework (NPPF), revised in 2021 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."* (Paragraph 61)
- 2.37. And
- "Strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period."* (Paragraph 66)
- 2.38. The Planning Practice Guidance (PPG) clearly states that the standard method identifies a minimum annual housing need figure and that this differs from a housing requirement figure (Paragraph 002 ID Reference: 2a-002-20190220). The PPG continues by stating: *"The government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. 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). As such, the use of the standard method as the basepoint for the housing requirement in the new Local Plan is therefore in accordance with the current national policy guidance and is therefore the correct approach to take forward.
- 2.39. It is acknowledged that the conclusion of the Housing and Employment Development Needs Assessment (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 Savills believes the affordability position is so great that an uplift should be included. East Hampshire's current affordability ratio (median house price to median workplace-based earnings) is within the top 35 authorities

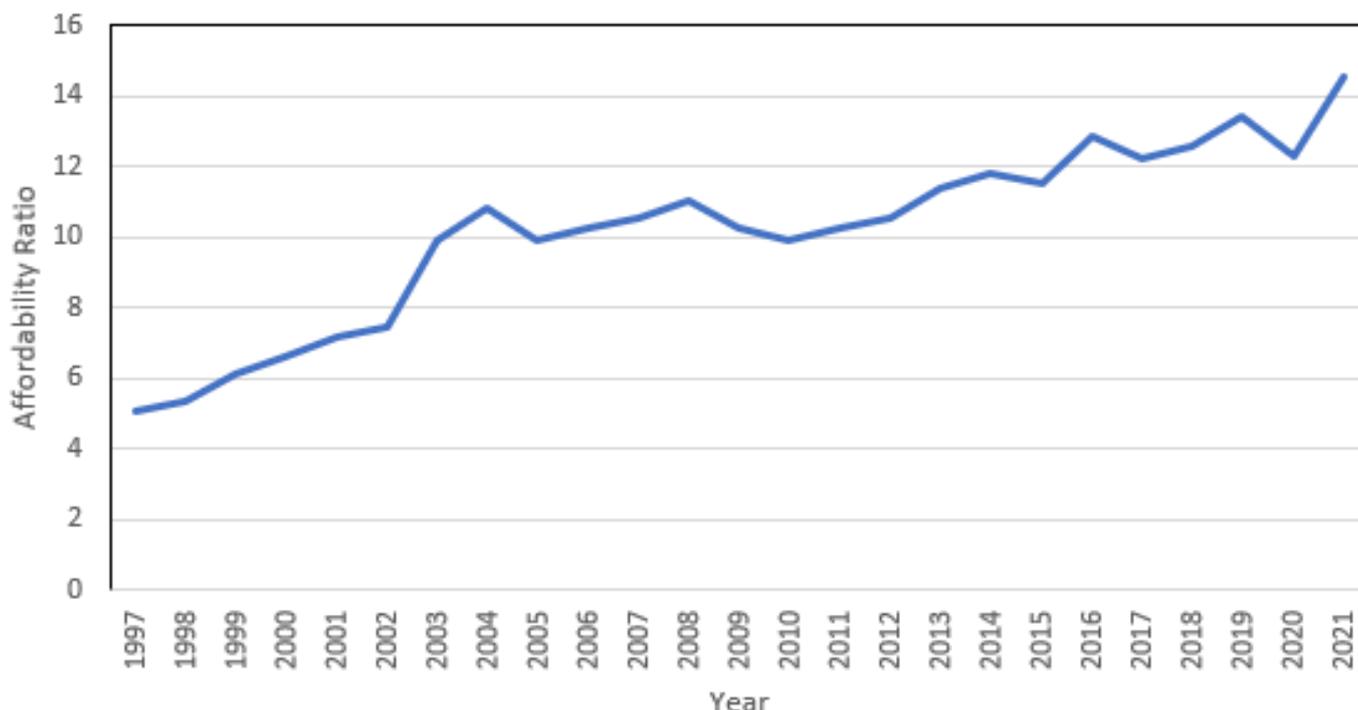
# Representations to Regulation 18 Consultation

East Hampshire District Council



in the country (330 in total) and is the 13<sup>th</sup> highest authority outside of London. Overall, the Southeast 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.

**Figure 3: Affordability Ratios 1997-2021**

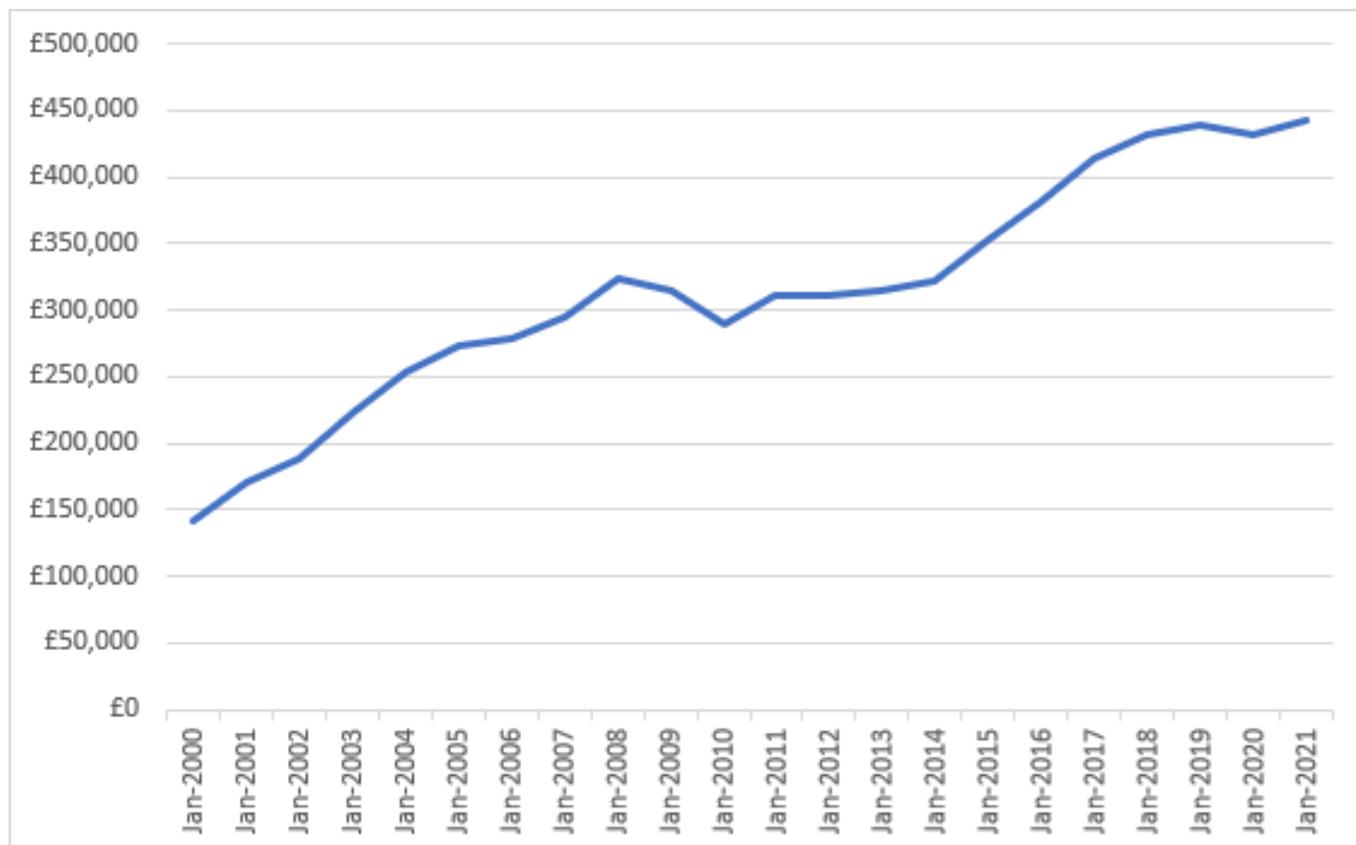


2.40. The Local Plan is not due for adoption until September 2025 at the earliest, based on the currently published Local Development Scheme (August 2022). Therefore, it is highly likely that the affordability ratio will increase prior to adoption of the draft Local Plan, and this would result in the publication of a higher standard methodology figure for East Hampshire. Research into East Hampshire’s housing market indicates that the average house price in East Hampshire rose from £441,561 in January 2021 to £475,091 in January 2022 (increase of £33,530) and to £501,203 (a further increase of £26,112)<sup>1</sup>. This is a greater price increase than between January 2022 and January 2021 which saw an increase of £10,572, indicating that affordability is likely to worsen before adoption. A graphical representation of house prices in East Hampshire since January 2000 is provided below.

<sup>1</sup> Savills using HM Land Registry



Figure 4: Average House Price in East Hampshire 2000-2021 – Savills using HM Land Registry



2.41. Therefore, whilst the use of the standard method is welcomed and supported in the draft Local Plan, there should be more emphasis that this is a minimum figure, and an uplift should be included as set out within the PPG.

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

Yes	No
-----	----

**POP2a Please explain your answer**

2.42. The Planning Practice Guidance (PPG) clearly states that the standard method identifies a **minimum annual housing need figure** and that this differs from a housing requirement figure (Paragraph 002 ID Reference: 2a-002-20190220). The PPG continues by stating: “*The government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. 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*

# Representations to Regulation 18 Consultation

East Hampshire District Council



*circumstances where it is appropriate to consider whether actual housing need is higher than the standard method” (Paragraph 010, Reference ID: 2a-010-20201216, Savills emphasis added).*

2.43. The consultation document also highlights the latest median workplace-based affordability ratio at 14.51 which is in the top 35 authorities in the country (330 in total) and is in the highest 20 authorities outside of London. With the Standard Methodology next reviewed early in the new year the worsening position of affordability is only likely to increase the requirement for East Hampshire reinforcing not only that the actual requirement at the time of adoption will more than likely be higher than the 517pa currently quoted (for the Local Plan area) but also in an area as unaffordable as East Hampshire the figure should be seen very much as a minimum and include a further buffer requirement to meet expected increases and as required by Guidance a suitable non implementation rate. This argument for an additional buffer is further strengthened by the acute affordable housing need in the district mentioned previously.

### **POP3 Based on the above should we meet**

<b>All the housing needs of East Hampshire’s part of the SDNPA</b>
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**

2.44. As the consultation document sets out clearly on page 24 there is no new evidence that justifies any deviation away from 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:**

<b>Offer to assist with all unmet needs, regardless of scale and location</b>
<b>Offer to assist with some unmet needs, where there may be a direct relationship with the communities of East Hampshire</b>
Do not offer to assist with any request from our neighbours

### **POP4a Please explain your reasons**

2.45. Whilst the precise amount of unmet need is still to be agreed, given the timescales for the adoption of this new Plan (2025) the level of unmet need will need to be quantified and planned for through Statements of Common Ground between the relevant adjoining authorities. The challenge of unmet need is only growing and the figures for unmet need considerable. For example, Partnership for South Hampshire (‘PFSH’) formally agreed to enter into a Statement of Common Ground (SoCG) between the ten member authorities in September 2020. The first iteration of the SoCG was published in October 2021 and set out an anticipated shortfall of **12,896 dwellings** across all ten authorities for the period 2021-2036. PFSH is currently in the process of updating their SoGC, in which the 2022 revision sets out an unmet need of **19,865 dwellings** for the period of 2022-2036.

# Representations to Regulation 18 Consultation

East Hampshire District Council



- 2.46. This clearly demonstrates that there is anticipated to be a significant unmet need within the PfSH area of nearly 20,000 dwellings by 2036. However, it is also important to note the increase in the estimated unmet need between the publications in October 2021 and November 2022, where the unmet need increased by approximately 7,000 unmet dwellings in a one-year period. This therefore indicates that the situation is worsening rather than improving, and it is more important than ever for authorities within PfSH to accommodate more unmet need.
- 2.47. Furthermore, in the latest publication from PfSH it is recognised that only two authorities in the area are currently able to demonstrate a surplus in housing supply between 2022 and 2036, with East Hampshire showing the smallest deficit. Whilst it is only a snapshot at the current time, it reflects that there are limited opportunities within the PfSH area to provide the unmet need without further identification of land for development and collaboration.
- 2.48. Any contribution to unmet need of the neighbouring authorities should be in addition to the standard method minimum requirement. As such, a combination of both approach 1 and 2 apply.

## **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 Please explain your reasons**

- 2.49. For the following Housing related questions HOU1, HOU2, HOU3, HOU4, HOU5 and HOU6 the explanation is consistent. Large Development sites as explained on page 50 of the Consultation Document and in the Infrastructure Background Paper 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.
- 2.50. Large development sites also have the ability to create balanced communities which genuinely provide homes for all. EHDC’s evidence base is clear that there is a growing demand for older persons accommodation, adaptable homes and a suitable mix of smaller accommodation. Large development sites due to scale, placemaking and viability create a range of accommodation to ensure a Living Well objective is met, homes for all are provided and a balanced community is created.

## **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
-----------	-----------	---------------

# Representations to Regulation 18 Consultation

East Hampshire District Council



## HOU7a Please explain your answer

2.51. EHDC cannot currently demonstrate a suitable record of delivering affordable dwellings. According to the latest Authority Monitoring Reports (AMR), the following percentages of affordable housing have been completed:

	Overall Net Completions	Affordable Completions	Percentage
2021	360	91	25%
2020	626	208	33%
2019	948	259	27%
2018	791	211	27%
<b>TOTAL:</b>	<b>2,725</b>	<b>797</b>	<b>28%</b>

2.52. This shows that against a policy of 40% affordable housing provision (35% from Whitehill and Bordon) the Council has been providing an average of only 28% affordable housing. This includes years such as 2021 where the overall net completions fell significantly short of the Joint Core Strategy target of 492 dwellings per annum (dpa).

2.53. Therefore, whilst affordability is included within the standard methodology to an extent, the poor performance of EHDC against affordability policies, and the severity of affordability within the District and the Southeast as a whole indicate that a further uplift would be appropriate to provide overall more affordable housing.

2.54. Notwithstanding the above, Harrow Estates considers that due to viability and delivery considerations the overall affordable housing percentage contributions remain the same. The overall percentage of affordable homes delivered would be dependent on the overall housing figure taken forward, as such the key to unlocking affordable delivery is increasing the minimum delivery figure of all homes.

2.55. It is also acknowledged and evidenced that the most likely way of securing affordable housing is not only just by the delivery of more market housing but by delivery of large strategic sites that are more likely to achieve the policy level provision. The above table is quite clear that if EHDC just relies on a 40% provision on qualifying homes with no consideration of quantum or larger strategic sites then the provision will continue to fail as in recent years. A large windfall allowance will also add to the lack of on-site delivery because by nature it tends to be brownfield and smaller by scale so either is not a qualifying scheme or it simply is not viable to deliver affordable housing on the brownfield site. As such, it is considered critical that EHDC employs robust assessment criteria to affordable housing policy.

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

Least Important			Most Important

## Comments on Environment

2.56. Harrow Estates supports the delivery of green infrastructure with new development and recognises the benefits it can bring to health and wellbeing, biodiversity and assisting with the Climate Emergency. Large development sites can make a significant contribution to delivering new and enhanced green infrastructure

# Representations to Regulation 18 Consultation

East Hampshire District Council



as well as delivering the minimum requirement of biodiversity net gain and protecting the most environmentally sensitive sites. Through good urban design and placemaking large sites can play an important role in this extremely important area and which is why ranking the environmental considerations was not appropriate as they are integral to each other.

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

Most Important	
	<b>See text below at paragraph 2.57. in relation to ranking of infrastructure</b>
Least Important	

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

Very Happy	Happy	<b>Neutral</b>	Unhappy	Very Unhappy
------------	-------	----------------	---------	--------------

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

Many small sites dispersed across the district	Medium sized sites	<b>Larger sites</b>	A mix of these
--	--------------------	---------------------	----------------

### INF3a Please explain your answer

2.57. Harrow Estates considers all necessary infrastructure to be important in the delivery of sustainable development and so has not ranked INF1. Large Development sites as explained on pages 50 of the Consultation Document and in the Infrastructure Background Paper 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. Without new homes the Consultation Document also states that the money available to fund infrastructure improvements would significantly diminish (page 49).

2.58. Large development sites also have the ability to create balanced communities which genuinely provide homes for all.

## Comments on Development Strategy and Spatial Distribution

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

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

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

2.59. Notwithstanding the above rankings, Harrow Estates objects to the spatial strategy options as set out at DEV1 and considers that flaws exist within each. However, the Local Plan vision and objectives are clear in so much as they require delivery of the most sustainable homes in the most sustainable locations. There is therefore a requirement for any spatial option to be evidence-led and, for that matter, influenced by transport evidence. It is very surprising that EHDC has not revisited this evidence in this consultation exercise given the importance in defining a spatial strategy. Indeed, many of the changing circumstances that are listed as to why this Reg 18 was again necessary are influenced by movement and transport.

- Option 1: In specific terms, Harrow Estates objects to Option 1 strategy on the basis that it would be informed by a flawed approach to a revised settlement hierarchy that ignores the complex spatial interaction of different employment clusters within the district, and which is therefore likely to result in unnecessary vehicle kilometres, emissions and congestion. In this context, Option 1 would actively work against the stated vision and objectives, such that the Plan would be unsound. (Refer to our separate representations to the settlement hierarchy.)

Further, the pros and cons of option 1 are considered to be confusing. The option deems that mitigating greenhouse gas emissions relations to transport as a pro, however, note that reducing the need to travel long distances to meet some of peoples' everyday needs as a con. The above contradicts the importance that the Council has placed on the implementation of the 20-minute neighbourhood principle, which by its nature would ensure everyone's needs are met in proximity to their house and as such would not need to travel long distances.

Consequently, it is reasonable to assume that this option would only have negative impacts on greenhouse gas emissions.

- Option 2: Harrow Estates does not object in principle to Option 2 on the basis 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, similarly the pros and cons of Option 1, those of Option 2 are confusing due to the same considerations as set out above. It is noted that larger settlements, such as Alton, will inherently have access to more comprehensive facilities and better public transport options than smaller settlements. Further they would be better positioned to deliver the 20-minute neighbourhood principles and have better access to existing walking and cycling infrastructure.

Consequently, it is reasonable in the context of this spatial option that only positive impacts on greenhouse gas emissions would result.



- Option 3: Harrow Estates does not object in principle to a population-derived spatial strategy since this is likely to closely mirror the 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 which could offer the potential to create proximity benefits which would increase the opportunity to travel by non-car modes, reduce vehicle kilometres and emissions.
- Option 4: Harrow Estates considers this the less suitable spatial option for a number of reasons. The lead in time for the delivery of new town is considerable and to deliver the proposed Vision any new development would need to be infrastructure led to provide the principles of a 20-minute neighbourhood. The complexity of new settlements and risk of delay will not assist in the delivery of much needed housing into the latter part of the housing trajectory.

The delivery of a new settlement would not only need to be linked to new infrastructure but, importantly, will also need to be linked to employment and jobs. Unless the new settlement created new employment floorspace or was close to existing employment centres with good public transport links, the challenge of active and non-car travel will be considerable especially in the early phases of the development. The likelihood is therefore that there will be a long-term legacy of outward commuting of residents to access employment facilities, with inward commuting of residents from other areas of the district and beyond to access any employment facilities delivered alongside the new settlement.

These concerns are also compounded by scale which was proven by the deletion of the proposed allocation at Northbrook which was withdrawn from the previous version of the draft Local Plan following the Reg 18 consultation process and the significant amount of evidence submitted during that process. The consultation document now refers to a new settlement of 1,500 homes plus which, whilst larger than the Northbrook allocation, will still only provide the critical mass to sustain a limited range of facilities and services such as a small local centre with a primary school. Any new residents would, for example, be reliant on secondary school provision elsewhere in the district. This creates serious concerns about self-containment and more pressure on inward and outward commuting. A new settlement to be considered self-contained needs to be in the order of 5,000 new homes at least.

Further, it is debatable as to whether Option 4 would provide greater greenhouse gas emissions reduction relating to development than Options 1-3. It is considered that through the delivery of entirely new settlements, additional infrastructure will need to be provided which will have associated additional carbon emissions through construction materials and process.

2.60. As such, Harrow Estates consider that, although Option 2, is the 'best' option, work needs to be undertaken to strengthen the proposed development strategy to ensure all priorities of the draft Local Plan can be achieved.

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

Yes	No
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# Representations to Regulation 18 Consultation

East Hampshire District Council

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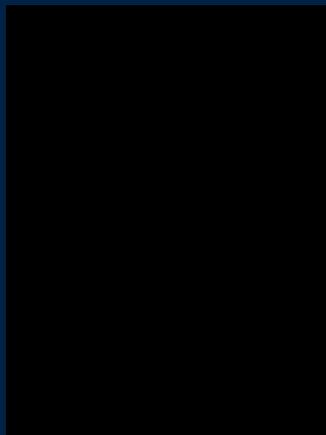
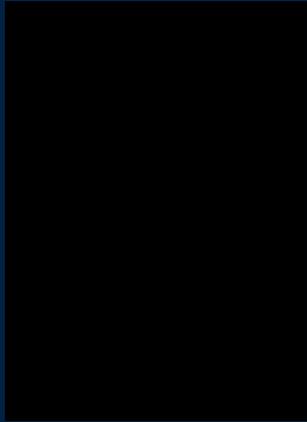


## *DEV3a If yes, please explain*

- 2.61. Harrow Estates considers that EHDC should identify an additional 'Transport Led' 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 to live in a 20-minute neighbourhood.

## 3. Conclusion

- 3.1. This representation document responds to the EHDC Regulation 18 Stage 1 Issues and Priorities Consultation in relation to the land at Chawton Park Farm on behalf of Harrow Estates.
- 3.2. Section 1 of the report provides an introduction and background to the site's promotion history and an acknowledgement that this Regulation 18 consultation is not exclusive from those undertaken in 2019 and that EHDC has considered previous comments and representations in its preparation. It is set out that Harrow Estates has made representations to the stages of consultation below and has been proactive in engaging with stakeholders to ensure that there are no technical reasons why the site it continues to promote at Chawton Park Farm should not be considered at the next stage of consultation. Harrow Estates notes that on 28 June 2021 EHDC published that, following extensive site assessment work and the Large Site Consultation, Chawton Park Farm was considered as the most sustainable area to develop, with links to Alton's transport infrastructure, services and facilities.
- 3.3. It is at Section 2 that this representation document begins to explore the draft EHDC Regulation 18 Stage 1 consultation document through response to posed questions. Overall, it is noted that Harrow Estates is in support of the vision presented in the document, however, raise sever key matters as summarised below:
- Amendments made to the wording of the vision to ensure that EHDC maximise their response to the climate emergency.
  - Inclusion of a homes for all or “*a front door for everyone*” within the vision or the strategic objectives.
  - Identification of a spatial strategy that not only delivers homes in sustainable locations, but which would also satisfy the higher threshold of delivering homes in the most sustainable locations to ensure that development is as sustainable as possible.
  - Recognition that it is not possible, currently, to include embodied carbon emissions in the definition of 'net zero carbon' development, unless significant offsetting measures are included.
  - Recognition that basing the settlement hierarchy purely on the 20-minute neighbourhood concept is an oversimplistic way to inform the future spatial distribution of development throughout the district.
  - Use of the Standard Methodology as the minimum figure and recognising that the required quantum of housing is likely going to increase due to changes in household projections, affordability ratios and increasing PfSH unmet need.
  - Recognition that large sites present the best opportunity to deliver affordable homes and new infrastructure.
  - Identifies that Option 2 as presented is the most sustainable spatial strategy.
- 3.4. As such, Harrow Estates considers that further technical work is required to produce a robust and sound local plan for the EHDC area and welcome any further conversation as to how Chawton Park Farm can facilitate this.



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# Representations to Regulation 18 Consultation

## East Hampshire District Council

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Land at Lynch Hill, Alton

Prepared for: Tanvale Holdings Limited and Frontier  
Estates

# Representations to Regulation 18 Consultation

East Hampshire District Council

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## Contents

1.	Introduction	1
2.	Representations on the draft East Hampshire Local Plan	4
3.	Conclusion	6

## 1. Introduction

- 1.1. These representations, prepared by Savills on behalf of Tanvale Holdings Limited and Frontier Estates (Tanvale and Frontier Estates), are made on the East Hampshire District Council (EHDC) Regulation 18 Issues and Priorities (Reg 18) consultation. Tanvale and Frontier Estates acknowledge that this Regulation 18 consultation is not exclusive from those undertaken in 2019 and that EHDC has considered previous comments and representations in its preparation.
- 1.2. Tanvale and Frontier Estates are jointly promoting Land at Lynch Hill, Alton for employment land, which was included in the Draft Local Plan as an allocation to deliver 14.3 hectares (ha) of employment land (B class uses). The site was numbered SA22 and referred to as 'Land at Lynch Hill'.

**Figure 1: Site location**



- 1.3. The joint venture between the landowner Tanvale and developer Frontier Estates ensures that Land at Lynch Hill is available, deliverable and developable and can commence within the first five years of the Plan.
- 1.4. Tanvale and Frontier Estates have previously made representations to the EHDC Draft Local Plan 2017 – 2036 Reg 18 consultation (March 2019). As part of the Regulation 18 consultation in 2019, Tanvale and Frontier Estates submitted the following technical information in support of Land at Lynch Hill :
- Land Use Budget plan (Drawing no. LUB001) (Savills, March 2019)
  - Landscape & Visual Context Addendum (Savills, March 2019)
  - Employment Land Review (Savills, March 2019)
  - Transport Appraisal (Calibro, March 2019)
  - Updated Ecological Walkover Survey and Technical Note (ECOSA, March 2019)
- 1.5. Tanvale and Frontier Estates also provided a Vision Document in July 2021, to support the allocation of Land at Lynch Hill for employment generating uses.

## Existing Site Allocation

- 1.6. The southern part of Site SA22 (shown in blue in Figure 2) is located within the defined settlement boundary for Alton. Policy EMP1 (Land at Lynch Hill) of The Local Plan Part 2: Housing and Employment Allocations (LPP2) (adopted April 2016) identifies this part of the site for employment provision 7 hectares of the total 9.4 hectares of land as allocated. Policy EMP1 is set in full below:

*“An overall site area of 9.4ha is allocated to accommodate about 7ha of employment land.*

*The site will be developed in accordance with the following site specific criteria.*

*Development shall:*

- a) Provide vehicular access to the site;*
- b) Ensure any significant negative traffic impact is mitigated on the local road network;*
- c) Provide an on-site movement layout suitable or all potential users, linked to existing external routes including the Public Rights of Way network;*
- d) Provide landscaping and screening to minimise the impact of development on the setting of Alton;*
- e) Provide a buffer zone along the river to protect and enhance the biodiversity value and prevent further erosion of the river and its corridor; and*
- f) Be supported by a Biodiversity Enhancement and Mitigation Scheme and include measures to protect key species and habitats on site.”*

Figure 2: LPP2 Employment Allocation – Policy EMP1 – Land at Lynch Hill



- 1.7. Tanvale does not seek to revisit previously submitted information or representations. These representations will consider the issues and priorities raised by EHDC and feedback accordingly.

## 2. Representations on the draft East Hampshire Local Plan

### Overall response to Regulation 18 Issues and Priorities Phase 1 East Hampshire Local Plan 2040.

- 2.1. This section sets out Tanvale and Frontier Estates principal comments on the draft East Hampshire Issues and Priorities Regulation 18 Part 1 Local Plan (2021-2040).

#### Issues and Priorities – Overview

- 2.2. It is stated on page 11 of the consultation document that *'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'*.
- 2.3. Tanvale and Frontier Estates are disappointed that employment is not considered as part of this Regulation 18 consultation.
- 2.4. Tanvale and Frontier Estates have been broadly supportive of the direction of travel of the EHDC Draft Local Plan, as presented in 2019. In particular, directing the majority of employment into Alton, the largest town in the district. However, Tanvale and Frontier Estates were concerned that new retail is proposed to only be directed to the centres, and that employment allocations proposed in the emerging Local Plan were for solely B class uses, without the flexibility for other employment generating uses that would ensure those employment allocations are viable.

#### **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."*

- 2.5. Overall, Tanvale and Frontier Estates are supportive of the vision which demonstrates a proactive approach to planning for the climate emergency and recognises the mutual need to tackle climate change whilst delivering accessible employment opportunities, new homes, and healthy inclusive communities.
- 2.6. To achieve the above, it is implicit that the Plan seeks to identify an optimised spatial strategy that not only delivers homes and employment in sustainable locations, but which would also satisfy the higher threshold of delivering homes and employment in the most sustainable locations to ensure that development is as sustainable as possible.

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

- 2.7. A specific policy on older persons accommodation should 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 and the location of these homes across the district (based on the settlement hierarchy).

- 2.8. EHDC's evidence base is clear that there is a growing demand for older persons accommodation and this should be prioritised within the emerging Local Plan in a standalone policy, with an acknowledgement that the delivery of specialist older persons accommodation, such as extra care provision, can generate significant employment opportunities for the District.

## Development Options

- 2.9. Tanvale and Frontier Estates supports Development Options 2 (Concentrate new development in the largest settlements) and 3 (Distribute new development by population) put forward in the Regulation 18 consultation.
- 2.10. Spatial Option 2 is supported on the basis that the delivery of development (housing and employment) in the largest settlements will create proximity benefits which would increase the opportunity to travel by non-car modes, reduce vehicle kilometres and emissions. Larger settlements, such as Alton, will inherently have access to more comprehensive facilities and better public transport options than smaller settlements. Further they would be better positioned to deliver the 20-minute neighbourhood principles and have better access to existing walking and cycling infrastructure.
- 2.11. Spatial Option 3, applying a population-derived spatial strategy is likely to closely mirror the results of Spatial Option 2.
- 2.12. The options put forward in the Regulation 18 consultation appear to cover all potential solutions to the distribution of development, therefore Tanvale and Frontier Estates have no further suggested options.



## 3. Conclusion

- 3.1. This representation has been prepared by Savills, on behalf of Tanvale Holdings Limited and Frontier Estates in response to the East Hampshire Local Plan Regulation 18 Consultation. In submitting these representations, Tanvale and Frontier Estate wishes to set out in the strongest possible terms its support for EHDC to plan positively for the delivery of development in sustainable locations.
- 3.2. Tanvale and Frontier Estates wish to kept informed as work on the draft plan progresses to Submission version stage, and would welcome a meeting with EHDC officers to discuss any of the comments made in these representations, and to discuss the Land at Lynch Hill site.



[Redacted]

**From:** [Redacted]  
**Sent:** 16 January 2023 17:47  
**To:** EHDC - Local Plan  
**Subject:** Local Plan consultation  
**Attachments:** [Redacted]  
[Redacted]  
[Redacted]

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** Consultation Responses

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

Dear Sir / Madam

On behalf of Winchester College please find attached a submission for your consideration (also submitted within the LAA online system, for which the acknowledgement is attached).

Please consider this submission also in relation to your question **DEV3** in the consultation questionnaire. For the reasons set out in the attached, it would be appropriate for the Local Plan to facilitate an element of residential development on less-constrained sites in smaller villages such as Lasham where this is capable of producing economic, social and environmental benefits.

Kind regards

[Redacted]

[Redacted]  
[Redacted]  
[Redacted]

Savills, Mountbatten House, 1 Grosvenor Square, Southampton, SO15 2BZ

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# Land north west of Lasham

## 'Call for Sites' submission to East Hampshire District Council

January 2023



## Introduction and purpose

This submission has been prepared by Savills on behalf of Fellows of Winchester College, which owns much of the land around the village Lasham, Alton.

This document has two aims:

1. To highlight the potential to deliver up to around 15 low carbon dwellings on land to the north west of the village, alongside public open space, footpath connections and ecological enhancement as part of a small-scale initiative to support the village's future sustainability.
2. To identify the wider extent of the College's land holdings around the village of Lasham and a willingness to positively engage with EHDC through the Local Plan process in relation to other matters including environmental offsetting (Green call for sites)

The Site that is being proposed is within Land Register Title SH30169 and is approximately 2.8 Hectares. It lies within the administrative boundary of East Hampshire District Council. In East Hampshire's Local Plan consultation, part of the Site has previously been considered (LAS-001 Land South of Manor Farm Lane, Lasham and Part of Land North of Lasham Hill Lane, Lasham) but the attached provides additional detail on the specific proposals.



Location of site

## Why this site?



### Supporting the village

There has been no housing for many years, and meanwhile facilities have been lost. New investment and residents would support the community.



### Unconstrained land

This site is unconstrained by environmental, heritage and other technical constraints



### Supporting the rural economy

Provision of housing in this location could support existing major clusters of employment focused around Lasham airfield.



### Flexible delivery

The site is potentially suitable for a variety of different residential types and sizes to address the diverse housing requirements of East Hampshire



### Landscape and trees

Development can be configured to retain and enhance key landscape features, maintaining distinct character and avoiding visual impacts.



### Ecological enhancement

Our proposals are capable of being brought forward on a nitrate neutral basis and are can fully meet new legislation requiring 10% Biodiversity Net Gain.



## Site and surrounding area

### Context, constraints and opportunities

It is acknowledged that Lasham is one of the smallest settlements in East Hampshire, having been identified as a Tier 4 settlement in the emerging settlement hierarchy for the Local Plan. However, there is an opportunity to deliver high quality development on a small scale in a manner that provides social, ecological and environmental gains through sustainable development.

At present, the site stands outside of settlement boundaries, but it is well related to the built up area of Lasham and is not encumbered by heritage, ecology or any other such protective designation.

There are no Scheduled Monuments within the vicinity of the Site and it falls outside the boundary of the Lasham Conservation Area. Manor House Farm and Manor House Farm Granary are two Grade II Listed Buildings that are situated opposite side of Manor Farm Lane to The Site. Badgers Cottage and The Barracks, both Grade II Listed buildings, can be found on the eastern boundary of the Site. There are no Local Designations and no Archaeological Designations or Archaeological Areas of Importance within the area surrounding the site.

The proposed site falls outside of The South Downs National Park, and is not in the Solent SPA or its 500m buffer. It is likewise not within a Site of Special Scientific Interest or within a Site of Important Nature Conservation – although Lasham Wood and New Copse are situated outside of Lasham village.

No Nutrient Neutrality Mitigation would be needed for any development that occurred at this site, following the Position Statement and Mitigation Plan for Nutrient Neutral Development (2022) released by EHDC. It is also not safeguarded for minerals or waste. It is classed III for Water Source Protection, but is not a protected Drinking Water Source Site. There are no TPOs within its vicinity.

### Summary of planning considerations

- Settlement Hierarchy: Other Settlements in The Countryside
- Not Best and Most Versatile agricultural land
- Low flood risk (other than for the Green Link)
- No scheduled monuments
- Listed Buildings: Manor House Farm and Manor House Farm Granary, Grade II is situated opposite potential site
- Not in Lasham Conservation Area
- No Tree Preservation Orders
- No Local Designations and No Archaeological Designations
- No Site of Important Nature Conservation
- Not a Mineral or Waste Safeguarding site
- No Nutrient Neutrality Mitigation required
- Water Source Protection Zone: Zone III – Total Catchment
- Not in a Drinking Water Protected Zone
- Bus Routes – Route 613 (Basingstoke - Liphook/Haslemere) Monday-Friday, once a day (Mornings). 13X (Basingstoke – Liphook/Haslemere) Monday to Saturdays, twice a day . 208 (Alton – Medstead – Bentworth – Lasham – Alton) Tuesdays and Fridays, twice a day.



*Ground water flood risk areas*



*Listed buildings*



*Conservation Area*



## Proposed development concept

Our proposal is to bring forward a small-scale development of up to 15 dwellings on land to the north west of the village, as indicated below. This would entail positioning two small clusters of development (7-8 each) in two discrete parcels adjoining the existing built-up area. Access would be via Manor Farm Lane. Development would be of similar density to the modern housing adjacent to the land, enabling the provision of a mixture of 2, 3 and 4 bedroom properties in a variety of tenures. Development on these sites would provide the opportunity for a small but locally-significant amount of both market and affordable housing to contribute to the vibrancy of the village.

Units would be developed to leading low-carbon standards and could be equipped with facilities to promote home working, contributing to a sustainable approach. A number of different architectural styles can be seen in the village so there is arguably no one specific style to emulate, however, high-quality design will be a key consideration. This must ensure that the development is seen as a natural and unobtrusive continuation of the village. Particularly critical to success will be the success of a palette of high quality materials, and the retention of boundary planting.

In conjunction with the development, there would be the opportunity to bring forward an area of green space immediately to the north west, providing opportunities for public access, informal recreation, and ecological enhancement. This would provide a particular benefit for existing residents for whom there is a lack of public open space and safe footpath connections.

Development would be well connected to the facilities located within Lasham such as The Royal Oak pub and the bus stop. This is serviced by bus services that allow travel to Alton, Basingstoke and the other surrounding villages. The Site's proximity to Lasham Air Field employment site is also beneficial, as residential development could provide housing for those employed locally.



Land use	Area (ha)
Development Area 1	0.3
Development Area 2	0.3
Green Link	1.5
Retained trees/hedges	0.6
<b>Total</b>	<b>2.7</b>



# Development Area 1

This area is almost wholly enclosed by mature trees and hedgerows and relates well to the existing built-up area. Development could be laid out, designed and configured so as to have negligible impact visually, whether on existing residents or the wider landscape.

Access can be delivered directly onto Manor Farm Lane from the site, and in turn connections can be made into Development Area 2 and into the Green Link.



# Development Area 2

This area is also well contained and could be brought forward either at the same time as Development Area 1, or as a second phase.



# Green link

Currently the land is of limited ecological value and is not publicly accessible, and represents something of a 'missing link' around the western side of the village. This area represents a positive opportunity to deliver ecological, landscape and recreational enhancements as part of a comprehensive scheme combined with small-scale residential.

*View southward across the Green Link*



*View northward from Green Link towards Development Area 2*



*Good examples of ecological enhancement alongside public access*

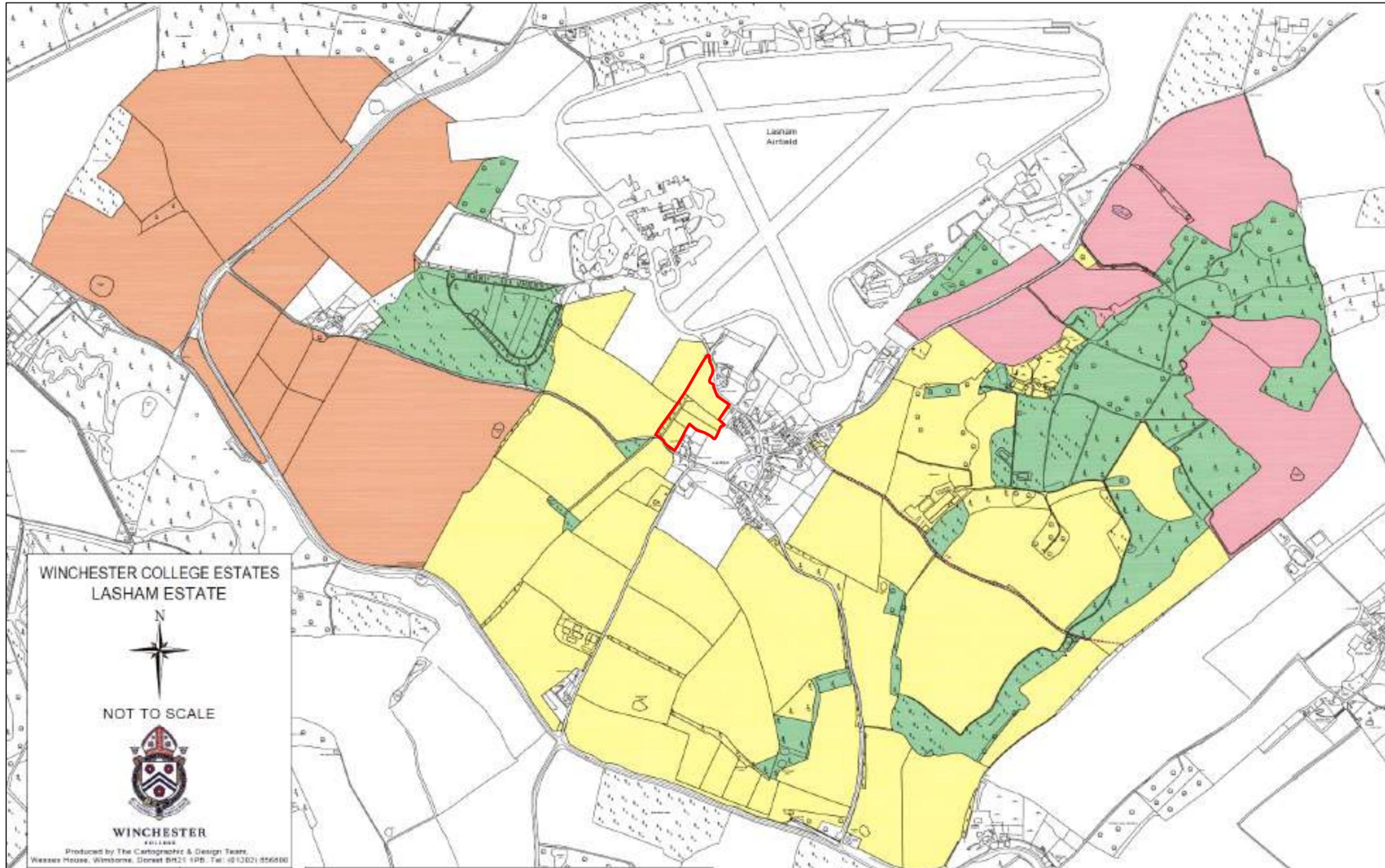


**Appendix**



## Appendix 1: Overarching estate map

Position of opportunity site identified in red







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## **East Hants Local Plan 2021-2040**

Issues and priorities Regulation 18 – Part 1

Representations on behalf of Elivia and Southcott Homes

January 2023

## CONTENTS

1.0	INTRODUCTION AND SCOPE OF REPRESENTATIONS.....	1
2.0	THE EVIDENCE BASE FOR THE LOCAL PLAN.....	3

## 1.0 INTRODUCTION AND SCOPE OF REPRESENTATIONS

- 1.1 These Representations are submitted to the Issues and Priorities Stage of the East Hants Local Plan Review 2021-20240 on behalf of Elivia Homes and Southcott Homes. The companies have a controlling interest in land at Lovedean which has been the subject of application and appeal proposals for residential development and included as a draft development allocation in the last draft East Hants Regulation 18 Local Plan Review. At this time, the subject site was identified as a draft housing allocation for 33 dwellings at Lovedean (Site Ref SA34).
- 1.2 In September 2021, the site was again identified as a deliverable site with a capacity of 36 dwellings in the Council's Land Availability Assessment (Site Ref LAA/HD-001).
- 1.3 In our view, this policy history supports the continued allocation of the site for residential development in the replacement emerging Local Plan Review 2021-2040. However as the response guidance makes clear, these representations are not specific to sites or detailed planning policies. Instead they focus on the policy context for the Local Plan particularly the 'tests of soundness' for Local Plan preparation set out in National Policy.
- 1.4 We are aware of the recent draft December 2022 revision to the National Planning Policy Framework (NPPF) with proposed amendments to the 'tests of soundness' for Plan preparation but until that guidance is adopted the existing tests in the current July 2021 version of the NPPF (paragraph 35) will apply. The tests require the emerging 2021-2040 Local Plan to have been:
- Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
  - Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
  - Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

- Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.

1.5 We will deal with the tests more thoroughly when the required Sustainability Appraisal has been completed and the development strategy and sites to deliver that have been chosen. At this stage our comments focus on the ‘justified’ test, the evidence base for the Local Plan and the development strategy which in our view best meets future housing need, secures sustainable development, and protects the natural environment of East Hants.

## 2.0 THE EVIDENCE BASE FOR THE LOCAL PLAN

- 2.1 Our comments pay regard to the available evidence base for the Local Plan in the 1) Housing Needs and Requirements, 2) Settlement Hierarchy and 3) Spatial Development Options background papers.

### **Housing Needs & Requirements Background Paper**

- 2.2 The Housing Needs and Requirements background paper indicates a housing need for East Hants District using the standard method calculation of 632 dpa. Allowing for 115 dwellings in the National Park it states the plan should provide for 517dpa in the Local Plan area of East Hants outside the National Park or 9823 dwellings over the 19 year plan period.
- 2.3 Table 11 in the background paper explains that allowing for 495 dwelling completions and other large and small permissions, allocations, and a windfall allowance, 6418 dwellings have already been accounted for, leaving a residual requirement **for 3,405 dwellings** (9823 – 6418) over the remaining plan period (2022-2040).
- 2.4 However in paragraph 5.29 of the background paper, the Council cautions against undue reliance on the figure and says that further testing should consider whether it should allocate for a higher number of homes (than the residual requirement as a minimum) in order to provide for greater resilience in maintaining a sufficient supply of sites to deliver the housing requirement.

### **Comment**

- 2.5 We agree that the proposed housing requirement figure of 3405 dwellings should not be relied on. Further testing should be carried out in connection with the 'duty to cooperate' and ability of the Council to contribute to the needs of adjoining authorities. As it stands the windfall allowance has not been properly justified and as a declining resource, past trends of sites coming forward cannot be guaranteed to continue at the same rate over the plan period to 2040. The 'commitments' has no discount applied and it would be prudent to apply a non-implementation rate of 10% to outstanding unimplemented consents and allocations.

- 2.6 A higher requirement would of course also help deliver more affordable housing, the need for which already stands at 613dpa, around 97% of the total annual need of 632 dwellings district wide (background paper para 4.15).

### **Settlement Hierarchy Background Paper**

- 2.7 The Settlement Hierarchy background paper introduces the concept of a '20 minute neighbourhood' as a means of informing the settlement hierarchy and the development potential of its settlements, taking account of the level of services, facilities, and accessibility. Paragraph 3.10 explains that the emphasis on climate change mitigation and the need to encourage more local trips by **walking and cycling**, the audit of accessibility for the revised settlement hierarchy focuses on distances that are appropriate for these sustainable modes of transport.
- 2.8 However, the remainder of the background paper just focuses on walking as the principal mode of travel. Paragraph 2.4 states that accessibility mapping has formed a key component of the revised methodology, looking at walking distances from district and local centres and other key facilities. In paragraph 3.14, it says the accessibility mapping has indicated that it is reasonable to define a 20-minute neighbourhood for East Hampshire settlements based on a 1,200m walking distance between groups of key services. There is no further analysis of cycling distances in relation to the definition of a 20 minute neighbourhood.
- 2.9 In ignoring cycling and the additional distances that can be covered within a 20 minute journey the neighbourhood assessment methodology has therefore excluded large parts of the '20 minute neighbourhood' that otherwise should have been included. In the case of map 6 showing Horndean if cycling distances were taken account of more of Lovedean would justifiably fall within the neighbourhood area.
- 2.10 The scoring matrix for identified facilities in Appendix D is also seriously flawed as it scores Lovedean with zero facilities. It has also ignored facilities that would fall within a 1,200m radius of Lovedean simply because those facilities are located beyond the district boundary of East Hants within Havant Borough. In our view, the methodology of judging the sustainability performance of a settlement ignoring nearby services and facilities simply because they are within a neighbouring authority is flawed.

2.11 We can confirm that the following facilities are located within East Hants at Lovedean within a 1,200m neighbourhood walking distance:

- Church in Lovedean Road
- Village Hall in Lovedean Road
- Bird in Hand Pub

2.12 In addition, the following are also within a 1,200m neighbourhood walking distance albeit within Havant Borough:

- Tesco Express – Lovedean Lane
- Post Office at 48 Frogmore Lane, PO8 9QL
- Pharmacy– 149 Milton Road
- Fish and Chip Shop
- Chinese Takeaway
- Premier Convenience Store
- Co-op Convenience store
- Bus stop
- 2 x hairdressers and
- Woodcroft Primary School

### **Comment**

2.13 The above exclusions in the Appendix D matrix are significant and have led to Lovedean ranking 14<sup>th</sup> in the table 2 list of settlements and 4<sup>th</sup> in the table 3 hierarchy of settlements. All the facilities should be included in the matrix and Lovedean recognised as a high performing settlement in sustainability terms.

2.14 If the additional cycling distances were recognised, the whole of Lovedean would also fall within the 20 minute neighbourhood of Horndean. On any view Lovedean forms part of the greater Horndean urban area and shares the benefits of a close proximity to its wide range of services and facilities as well as its own. Either Lovedean should be included within the Horndean Neighbourhood Area or given its own Neighbourhood Area status in the next review Plan.

2.15 We also propose Lovedean is included as a 2<sup>nd</sup> tier settlement in the hierarchy jointly with Horndean.

### **Spatial Development Options Background Paper**

2.16 We have already explained why the housing requirements to be planned for should be more than the present 3405 dwelling minimum and why Lovedean should be recognised as a second tier settlement in the hierarchy. The next stage is to decide where the needed housing should be directed and the role Lovedean could play in terms of the overall housing distribution.

2.17 The Spatial Development Options background paper offers four different options to accommodate future growth in East Hants outside the National park. They are:

**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 and

**Option 4:** Concentrate development in a new settlement

### **Comment**

2.18 In our view **Option 1** in dispersing development to a wider range of settlements with a sufficient range of local facilities in accordance with the 20 minute neighbourhood concept could help those smaller settlements better sustain themselves. However any distribution would still have to focus the most housing on those larger settlements best able to accommodate it like the greater Horndean/Lovedean area with its range of services and facilities in the southern parishes as an example.

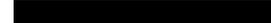
2.19 **Option 2** represents the traditional planning solution to accommodating future growth. It is based on a tried and tested methodology of directing development to those settlements best able to accommodate it. It favours development in the settlements highest in the hierarchy which would include Horndean/Lovedean in the southern parishes.

- 2.20 **Option 3** to distribute housing based on population would favour development in the north part of the district. However this would introduce additional development pressure and cause potential conflict with designated environmental areas such as the Wealden Heaths SPA. It would deflect housing away from the southern parishes and do less to support the wider housing needs of this area including the wider Partnership for South Hampshire area.
- 2.21 **Option 4** for a new settlement would potentially undermine land supply in the short to medium term as schemes of this sort will inevitably have long lead in times and require considerable infrastructure provision before housing delivery could commence. New settlements by definition would be less sustainable than the development of smaller sites utilising existing facilities within and adjoining existing settlements.
- 2.22 Our preferred options would therefore be **Option 2** as a first preference and **Option 1** as a second preference.

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16 January 2023

Dear Sir/ Madam

**Reg 18 Consultation on East Hampshire Local Plan 2021-2040  
Representations on behalf of Helios Property Ltd**

These representations are made on behalf of Helios Property Ltd who have a legal interest on land at Station Road (also known as River Road), Bentley. ('development site'). The location is indicated at Figure 1 and the Site Plan at Figure 2.



**Figure 1: OS Plan showing site boundary**



**Figure 2: Site Plan**

Comments on the East Hampshire Regulation Consultation are set out under the Council's sub-headings below.

### Background & Introduction

Rather than build on the two stages of public consultation already undertaken on the Local Plan, this current consultation appears to rewind the process back to basic principles and a series of high level questions rather than setting out a strategy for meeting East Hampshire's development needs. This is disappointing given the time and resources devoted to the earlier stages of consultation. It is hoped that the plan process will soon progress to setting out the allocations required to meet East Hampshire's development needs.

### Vision

The proposed vision that, *'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,'* is supported by our client. However clear objectives and allocations are ultimately required to achieve this, and we are keen that the plan is progressed to accomplish this.



## Overview

Question OV1 asks respondents to put the issues of 'Climate Emergency', 'Environment', 'Population and Housing', 'Types of Housing Needs' and 'Infrastructure' in order of importance. However, all these matters are important in the context of sustainable development. The plan will need to ensure that sufficient housing of the right type is brought forwards in a sustainable manner, supported by sufficient infrastructure and designed to reduce carbon emissions and conserve the natural environment.

These issues are not mutually exclusive and can be achieved at the 'development site', which is a sustainably located site. It is located in the 20 minute zone for mainline stations and the 20 minute zone for primary schools in the Settlement Hierarchy 2022. It is a site which can be developed in a manner that meets climate change requirements and achieves biodiversity net gain.

This section of the consultation recognises that affordable housing needs are extremely important in the District. In order to maximise affordable housing through on-site developer contributions, allowing sustainably located, viable sites to come forwards that can provide policy compliant affordable housing is crucial to meet this need.

## Population and Housing

In response to question POP1 & POP1a, the Council's own independent evidence (Technical Note: Testing the Standard Method Housing Need for East Hampshire by Icen) concludes that there is nothing in the analysis that supports moving to a consider a lower figure. Therefore, the Council should follow this independent advice and proceed on the basis of the standard method.

In response to question POP3 & POP3a, it is reasonable for the plan to include some of the housing needs of East Hampshire's part of the SDNA in order to ensure that the most sensitive landscape and scenic beauty of the National Park is conserved for the benefit of all.

## Infrastructure Consultation

In response to question INF3, it is considered most important to focus development across existing settlements so that existing infrastructure can be expanded as required to support an increased population.

## Development Strategy

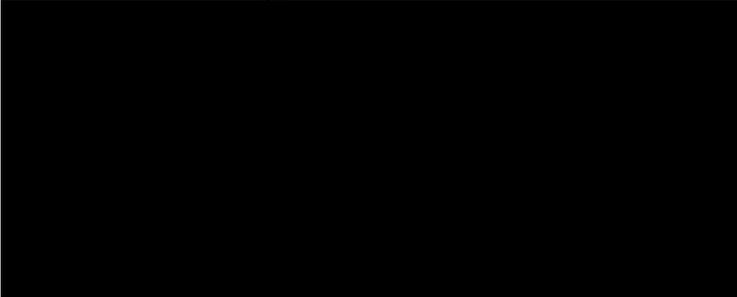
In response to question DEV1 and DEV2, we consider Option 1 to be the most sensible and equitable, subject to individual site opportunities and constraints.

It is considered that distributing development across a number of existing settlements is the most effective way of making use of and improving existing infrastructure, providing housing where it is needed, reducing need for travel and preserving the wider landscape of East Hampshire.



We are keen to see the plan progress in order for the Council's vision to be realised. We would be interested in meeting with the Council to discuss our client's land, which is available for residential development.

Yours sincerely,



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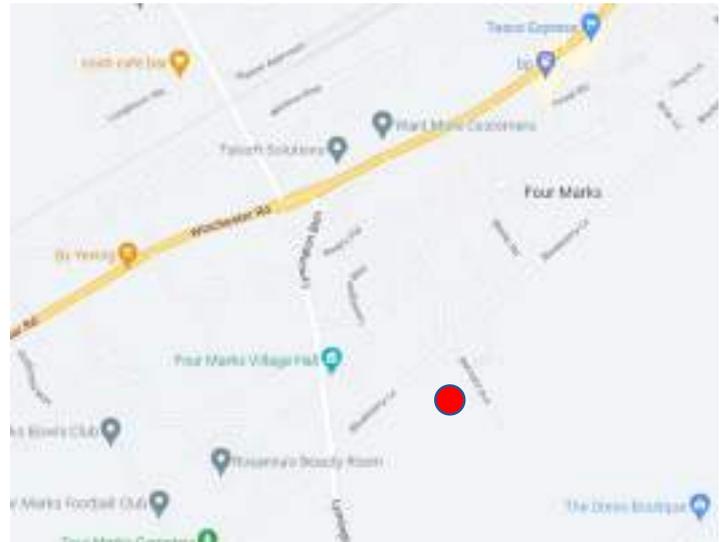
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16 January 2023

Dear Sir/ Madam

**Reg 18 Consultation on East Hampshire Local Plan 2021-2040  
Representations on behalf of Shanly Homes Ltd**

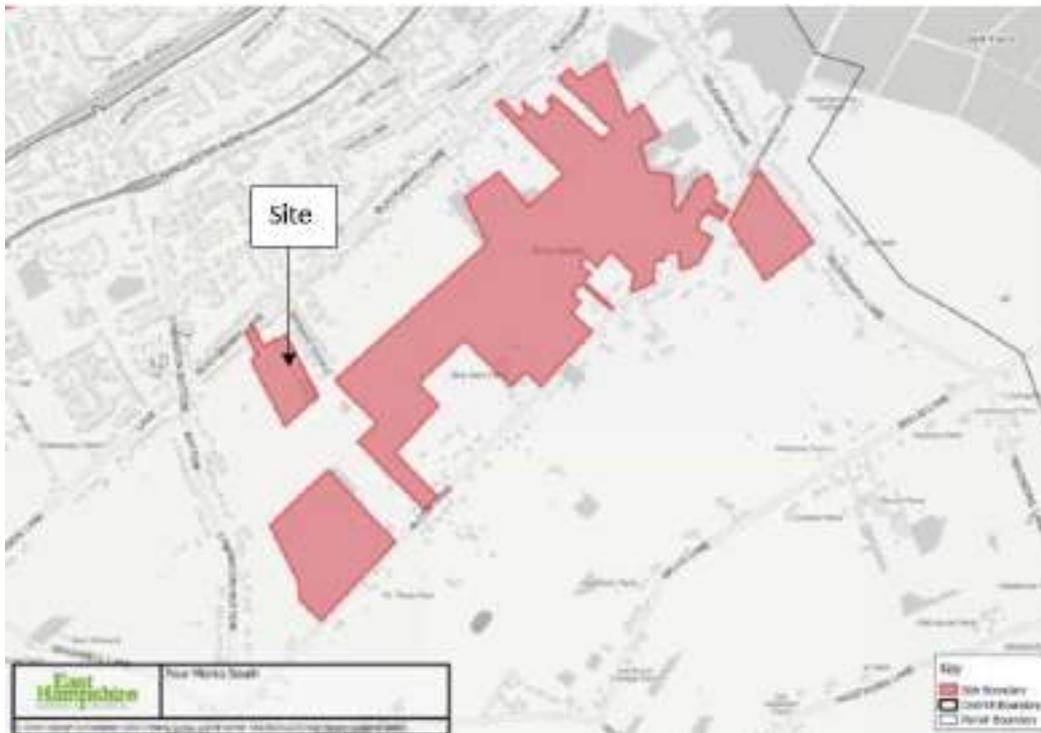
These representations are made on behalf of Shanly Homes Ltd who have a legal interest on land to the rear of 97-103 Blackberry Lane, Four Marks ('development site'). The extent of the site is shown in the OS Plan at Figure 1 and the location in Four Marks is indicated at Figure 2.



**Figure 1: OS Plan showing site boundary**

**Figure 2: Location indicated on Google Maps**

This site formed part of the Four Marks South, which was promoted as part of the Council's Large Development Sites Consultation in 2019 (Figure 3).



**Figure 3: Four Marks South (Large Sites Consultation)**

Comments on the East Hampshire Regulation Consultation are set out under the Council's sub-headings below.

### Background & Introduction

Rather than build on the two stages of public consultation already undertaken on the Local Plan, this current consultation appears to rewind the process back to basic principles and a series of high level questions rather than setting out a strategy for meeting East Hampshire's development needs. This is disappointing given the time and resources devoted to the earlier stages of consultation. It is hoped that the plan process will soon progress to setting out the allocations required to meet East Hampshire's development needs.

### Vision

The proposed vision that, *'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,'* is supported by our client. However clear objectives and allocations are ultimately required to achieve this, and we are keen that the plan is progressed to accomplish this.

### Overview

Question OV1 asks respondents to put the issues of 'Climate Emergency', 'Environment', 'Population and Housing', 'Types of Housing Needs' and 'Infrastructure' in order of importance. However, all these matters are important in the context of sustainable development. The plan will need to ensure that sufficient housing of the right type is brought forwards in a sustainable manner, supported by sufficient infrastructure and designed to reduce carbon emissions and conserve the natural environment.



These issues are not mutually exclusive and can be achieved at the 'development site', which is a sustainably located site, currently formed of garden land. Because the site is currently residential curtilage, its redevelopment would not result in the loss of any open countryside. It is located in the 20 minute zone for town/ village centres, the Four Marks & South Medstead the 20-Minute Neighbourhood and the 20 minute zone for primary schools in the Settlement Hierarchy 2022. It is a site which can be developed in a manner that meets climate change requirements and achieves biodiversity net gain.

This section of the consultation recognises that affordable housing needs are extremely important in the District. In order to maximise affordable housing through on-site developer contributions, allowing sustainably located, viable sites to come forwards that can provide policy compliant affordable housing is crucial to meet this need.

### Population and Housing

In response to question POP1 & POP1a, the Council's own independent evidence (Technical Note: Testing the Standard Method Housing Need for East Hampshire by Icenl) concludes that there is nothing in the analysis that supports moving to consider a lower figure. Therefore, the Council should follow this independent advice and proceed on the basis of the standard method.

In response to question POP3 & POP3a, it is reasonable for the plan to include some of the housing needs of East Hampshire's part of the SDNA in order to ensure that the most sensitive landscape and scenic beauty of the National Park is conserved for the benefit of all.

### Infrastructure Consultation

In response to question INF3, it is considered most important to focus development across existing settlements so that existing infrastructure can be expanded as required to support an increased population. Larger sites have the benefit of a larger contribution and potential to fund more significant infrastructure provision, however contributions from small and medium sites, located in/adjacent to existing settlements can be combined to achieve more significant improvements.

### Development Strategy

In response to question DEV1 and DEV2, we consider the order of preference to be Option 1, Option 3 and Option 2 because the level of housing required is likely to need to include medium sized settlements.

It is considered that distributing development across a number of existing settlements is the most effective way of making use of and improving existing infrastructure, providing housing where it is needed, reducing need for travel and preserving the wider landscape of East Hampshire.



We are keen to see the plan progress in order for the Council's vision to be realised. We would be interested in meeting with the Council to discuss our client's land, which is available for residential development.

Yours faithfully,





# **East Hampshire Local Plan 2021-2040**

## **Issues and Priorities Regulation 18 – Part 1**

### **Representation by Commercial Estates Group**

**January 2023**



## **East Hampshire Local Plan 2021-2040**

### **Issues and Priorities Regulation 18 – Part 1**

#### **Representation by Commercial Estates Group**

1. This representation responding to some of the questions contained in the East Hampshire Local Plan 2021-2040: Issues and Priorities Regulation 18 – Part 1 document has been prepared on behalf of Commercial Estates Group (CEG) who have an interest in land to the South of Alton. This interest extends to 3 parcels of land as edged red on the plan at Appendix 1 where CEG has Heads of Terms in place for a Promotion Agreement which will be in-situ within the next couple of months. The blue edged land is being promoted by another developer with whom CEG is willing to work alongside to deliver a new neighbourhood to the South of Alton.
2. It is appreciated that the Regulation 18 - Part 1 consultation is not raising site specific residential or employment matters, including potential allocations. However, as a strategic opportunity for growth, the land South of Alton could come forward as a logical neighbourhood, at the largest settlement in the District, primarily for housing development together with a primary school and local facilities. It is estimated that the land has the capacity to accommodate circa 750 dwellings of various types, sizes and tenures whilst protecting views to and from both Windmill Park and South Downs National Park (SNDP).
3. As a responsible promoter and deliverer of sustainable development across the country, CEG would welcome the opportunity to engaged with East Hampshire District Council to discuss, together with the promoter of the 'blue edged land', the planning merits and subsequent delivery of growth on the land South of Alton.
4. Through these representations CEG has sought to respond to the key questions raised in the Issues and Priorities document concerning the development strategy, the housing requirement, affordable housing, infrastructure and environmental requirements. In responding to the questions, CEG has had full regard to the topic specific Background Papers and the Interim Sustainability Appraisal.



## Overview

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

*Issue Rank Climate Emergency Environment Population and Housing Types of Housing Needs Infrastructure*

5. The ranking of CEG recognises that the Government has, and proposes to retain, a priority to deliver new homes for people to live in alongside the other policy aspirations. Accordingly, CEG ranks the issues as follows:
  1. Population and Housing
  2. Climate Emergency
  3. Environment
  4. Housing Types of Housing Needs
  5. Infrastructure

## The Climate Emergency

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

- *In the emerging East Hampshire Local Plan*
  - *In future neighbourhood plans*
  - *In local design codes*
6. Local and Neighbourhood Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity, landscapes and the risk of overheating from rising temperatures. Any development plan policies should be at a high level supporting appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts. A generic local design code could 'add' guidance to some of these high-level policies to aid a consistent approach to implementation.
  7. However, in CEG's experience with sustainable development schemes across the country, a 'one size fits all' policy or guidance approach to proposals does not work effectively. This is simply because each site is different and has different challenges and considerations which could be as simple as how sustainable drainage is delivered through to the topography affecting the orientation of buildings. Other factors include the site's location, constraints/opportunities and ground conditions which may affect the choice of construction



method. CEG's commitment to sustainable development is recorded in the company's own *Sustainability Policy and Strategy*<sup>1</sup> and the specialist staff who are employed.

8. A site-specific strategy, whether included in a site-specific design code or not, should be the detailed basis for tackling climate change for a particular scheme. However, matters such as construction methods, targets for zero carbon and potable water consumption are for national policy or regulations (including the Building Regulations) and should not be included in either development plan policies or in any site-specific strategy.

**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).*

9. The response to this question needs to be read alongside the answer to Question DEV2.
10. The short answer is "*Happy*" but CEG is concerned about the potential for an inflexible application of the 20-minute neighbourhood concept to determine the location of growth as explained in the Issues and Priorities document, the Climate Change Background Paper and the Settlement Hierarchy Background Paper. It is easier to plan for new developments being based upon a 20-minute neighbourhood principle (i.e. a blank sheet of paper) rather than seek to retrospectively apply the concept to existing settlements which is the approach being adopted.
11. The approach to defining a neighbourhood contained in the Background Papers appears to be based upon a 10-minute journey from a home to a designation (or some 800 metres) with the 20-minutes being the combined time of travelling to and from this destination. However, the only example of this approach being adopted is based upon research in Melbourne as referred to in the TCPA's *20-Minute Neighbourhoods: An Introduction for Council Planners in England* (page 7).
12. In addition to defining what a 20-minute neighbourhood is all about (as reproduced in the Issues and Priorities document), the TCPA also states that "*For the sake of simplicity, this guide calls such complete, compact and connected places '20-minute neighbourhoods' – but the name is not the point, nor is the number of minutes specified. What matters is that, at its best, this is a holistic and transformational approach to place-making, with significant potential to improve people's health and wellbeing.*" (emphasis added) In short, 20-minutes is not an

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<sup>1</sup> [CEG-Sustainability-Policy-and-Strategy-August-2021-shortened-v.pdf](#)



upper limit to the distance people will travel and there is other published material to support greater distances being appropriate and acceptable.

13. *Manual for Streets* (MfS) promotes the concept of walkable neighbourhoods which are typically characterised by having a range of facilities within 10 minutes' walking distance (about 800 metres) of residential areas. However, MfS also advises that 800 metres is not "an upper limit" and refers to the 2 kilometres (as a single trip rather than a return trip) advice previously contained in Planning Policy Guidance 13 (now revoked).
14. In Britain rather than Australia, authoritative research undertaken by the Chartered Institute of Transport in its publication *Planning For Walking* states that "Across Britain about 80 per cent of journeys shorter than 1 mile are made wholly on foot – something that has changed little in thirty years. In 2012 walkers accounted for 79 per cent of all journeys shorter than 1 mile." A distance of 1 mile equates to 1.6 kilometres and is a single trip rather than a return trip.
15. Research undertaken by White Young Green (now Tetra Tech Europe) published in *How far to People Walk* identified that "From the simple analysis of the NTS data we have shown that the average walking distance for All Regions excluding London is 1,150m and the 85th percentile distance is 1,950m, which corresponds to the PPG13 2km value. We suggest that for planning purposes the 85th percentile distance should be used to establish the walking catchment for sites outside London."
16. In considering locations for growth at the main settlements, including Alton, CEG considers that the strict application of a 10 minute/800 metre walking distance should not be applied to potential allocations. Instead, some flexibility should be applied based upon the available guidance and research (i.e. between 1.6 and 2 kilometres as the upper end) together with delivering high quality neighbourhoods achieved through appropriate choices of sites and the promotion of place-making. Such a potential allocation is the land to the South of Alton where the place-making aspirations of the emerging Local Plan could be delivered..
17. As a further concern, the reference is made in the Issues and Priorities document to both walking and cycling. However, in the Settlement Hierarchy Background Paper it is not clear on pages 24 and 25 whether the stated ideal distances to the facilities are intended to be on foot or cycle. There should be greater clarity because people are prepared to travel further



by bike than on foot (the average cycle journey according to the NTS is 3.5 miles/8 kilometres).

18. The final concern about the analysis of a 20-minute neighbourhood is the changing of travel patterns with an increasing emphasis now being placed upon virtual mobility. This is not recognised in the assessment undertaken and fails to acknowledge that living and travel patterns are changing. Virtual mobility includes the ability to communicate without needing to travel, working from home, buying goods, accessing services such as healthcare and on-line banking. The importance of virtual mobility as an alternative to physical movement has been heightened by the Covid-19 pandemic.

### **Development Strategy and Spatial Options**

**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*

19. CEG supports Option 2 followed by Option 3 which would have the same/similar effect if growth is directed towards the settlements with larger populations, such as Alton. Option 1 has some merit but only within the context of delivering additional affordable homes (see response to Question POP2).
20. A new settlement (Option 4) is not realistic for East Hampshire District given the lack of availability of a significant unconstrained area of land related to one of the 2 network rail corridors.

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

21. The answer to this question needs to be read alongside the response to Question CLIM6.
22. The Climate Change Background Paper recognises that "*Settlements with more local facilities and services than others can be more sustainable locations for new development, because new residents would be able to access the facilities and services without the need to travel long distances by car.*" and that "*In the context of the climate emergency, it is more important*



*than ever to encourage people to walk, cycle or use public transport wherever possible."* (paragraphs 4.9 and 4.10).

23. Further in the Spatial Development Options Background Paper it is also recognised that *"the largest settlements give people the greatest opportunity for walking and cycling to shops, schools and public transport connections"* (page 6). Further, Option 2 is highlighted as providing the greatest opportunity *"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."*(page 9).
24. The Option 2 development strategy would also be consistent with the approach contained in the National Planning Policy Framework (NPPF) whereby *"Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes."*(paragraph 124).
25. Although supporting the principle of the development strategy, CEG considers that there does need to be a refinement to the Option 2 as currently proposed. The Settlement Hierarchy Background Paper usefully assesses the facilities available at the settlements. However, it is still clear that some of the settlements have a greater range of facilities than others and there are important differences in the quality of the facilities available. As such, the current Settlement Hierarchy Methodology at Appendix C of the Background Paper is too crude because simply reaching 30+ points means that these settlements acquire Tier 1 status without proper consideration of the quality of these facilities, especially to promote sustainable locations for growth.
26. A refinement to the 'scoring', especially for sustainable travel choices, should be applied and the threshold to achieve Tier 1 status increased. There needs to be a greater range in 'scoring' (i.e. not just 0 to 2) applied to key facilities, especially those which would promote sustainable growth (e.g. a score of between 1 and 5). As an example, although the lack of a main line railway station at Whitehill & Bordon is recognised by the '0' score, this settlement is still the second-best scoring within the District. By contrast, the differential to Alton which has a mainline railway station is minimal and Liphook scores less than Whitehill and Bordon. For settlements with a mainline railway station then a score of '5' should be applied with a decreasing score for settlements which are a further away from a main line railway station. A similar approach could equally apply to the scoring of bus services with settlements acting as a 'hub' scoring higher (e.g. Alton).



27. This proposed change in 'scoring' applied to sustainable travel choices would reflect the NPPF whereby the approach to accommodating growth should promote both "*appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location*" and the "*potential for further improvement and the scope to promote sustainable travel modes that limit future car use*" (paragraphs 105 and 110)
28. The effect of applying a more refined approach to scoring in the Settlement Hierarchy Methodology would potentially result in only Alton being identified as a Tier 1 settlement (i.e. say a score above 35). It may then be appropriate to introduce a 5 Tier Hierarchy with Liphook and Whitehill & Bordon being Tier 2 settlements (i.e. a score 30-35) followed by Clanfield et al being Tier 3. This approach to the settlement hierarchy would also reflect the hierarchy contained in the East Hampshire Joint Core Strategy'.

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

29. The short answer is "no" but Option 2 needs to be refined for the reasons given in response to Questions CLIM6 and DEV2.

### **Population and Housing**

**POP1** *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*
30. The starting point should be the standard method for calculating housing need for East Hampshire District (including the SNDP). According to the Housing Needs and Requirement Background Paper, the need is a minimum of 632 dwellings per annum (Table 1).

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

31. Yes the housing need figure should be a minimum 577 dwelling per annum plus an additional 100 per annum of affordable homes delivered via Neighbourhood Plans. The housing



provision identified does not include any potential to meet the unmet needs of neighbouring authorities (see response to Question POP4).

32. Within the SDNP there is a statutory duty of “*conserving and enhancing the natural beauty, wildlife and cultural heritage of the area*” (National Parks and Access to the Countryside Act 1949). Further, the NPPF states that “*Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks.....which have the highest status of protection in relation to these issues....The scale and extent of development within all these designated areas should be limited*” (paragraph 176) (emphasis added).
33. CEG considers that fewer new homes should be provided within the SDNP than the circa 115 dwellings per annum (or 2,185 dwellings between 2021-2040) currently indicated in the Issues and Priorities document. This scale of housing growth is more than limited development and, is, as such, contrary to the statutory duty and the policy requirement for development to be limited within National Parks. In CEG’s opinion, the level of housing growth within the SDNP should be halved to circa 55 dwellings per annum with a consequential increase within East Hampshire District (outside the National Park) of 60 dwellings per annum thereby equating to a minimum baseline requirement of 577 dwellings per annum.
34. Further, and as is explained more fully in the Housing and Employment Development Needs Assessment and the Housing Needs and Requirement Background Paper, there is a significant need for new affordable homes. The estimate is that there is a required supply of 613 affordable homes per annum just to meet the need (Background Paper paragraph 4.15).
35. CEG recognises that, together with meeting a general housing need, the provision of 1,535 dwellings per annum (based upon a 40% affordable housing target) (Background Paper paragraph 4.16) would be unrealistic for the Local Plan to both plan for and deliver. However, CEG does consider that a specific affordable housing provision, potentially for small scale schemes in villages allocated in Neighbourhood Plans, could be an appropriate means to boost the supply of such homes.
36. To accomplish this then a specific policy target (outwith the overall housing requirement) of 100 affordable homes per annum should be included in the Local Plan. The 100 dwellings per annum would be a meaningful target and would enable the local communities preparing Neighbourhood Plans to plan to meet their own affordable housing needs.



**POP3** Based on the above should we meet:

- All the housing needs of East Hampshire's part of the South Downs National Park Authority (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

37. This question has already been answered under Question POP2 and is that East Hampshire District should meet some of the SDNP housing needs.

**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.

38. CEG supports the Council offering to assist with all unmet needs of neighbouring authorities albeit the distribution would need to be within the context of the Development Strategy and Spatial Options identified elsewhere in this representation (see the responses to Questions DEV1 and DE2).

39. Although CEG recognises that the Levelling-up and Regeneration Bill is proposing to remove the Duty to Co-operate there does remain an intention to introduce measures to secure appropriate engagement between authorities, where strategic planning considerations cut across boundaries, by an 'alignment policy'. What will be the basis of an 'alignment policy' is unclear and, in the absence of any specific evidence published alongside the Issues and Priorities document, CEG is not in a position to be able to suggest the potential level of additional housing which might be required to meet the needs of neighbouring authorities.

40. Accordingly, the 577 dwellings per annum, plus the additional 100 affordable homes per year, excludes any provision to plan for meeting unmet housing needs from neighbouring areas.

### **Types of Housing Need**

**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



41. Allowing for viability considerations, together with the proposed 100 affordable dwellings per annum delivered specifically through Neighbourhood Plans, CEG supports the proposition that the affordable housing target remains at 40%. The additional 100 affordable dwellings per annum delivered through Neighbourhood Plans would make a meaningful further contribution to meet the need for affordable homes.

## **Infrastructure**

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

42. In promoting land for development CEG seeks to build communities which include space for lives to flourish, for neighbourhoods to grow and for the value of the local area to be enhanced. As part of larger schemes, CEG provides new green spaces, much-needed new homes and high-quality places to live with access to neighbourhood amenities. This approach of building communities echoes the TCPA's approach to the planning of neighbourhoods where what matters is adopting a holistic and transformational approach to place-making, with significant potential to improve people's health and wellbeing. This approach to place-making would be applied by CEG to the master planning of the neighbourhood proposed on land South of Alton
43. Against this context, the type of infrastructure varies dependent upon the particular requirements of a scheme. However, as a general comment, the availability of sustainable or active travel choices is important but equally so are the necessary community facilities and utilities to support an increase in population. The delivery of biodiversity enhancements through green and blue infrastructure, including all types of recreation areas, is linked to creating space for people to live.

### ***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*

44. Based upon the answers to previous questions, CEG considers that a balanced portfolio of development sites (i.e. a mix of these) is required albeit with a focus on larger scale development occurring at, in priority order, the Tier 1 settlement of Alton followed by the Tier 2 settlements of Liphook and Whitehill & Bordon. Smaller scale sites to deliver the 100 affordable homes per year would equally be required at (what would be redefined as) Tier 3, 4 and 5 settlements where Neighbourhood Plans are prepared.



45. To deliver meaningful physical, social, community, green and blue infrastructure in a viable manner, some large-scale housing development would need to occur, such as the land South of Alton. This scheme being promoted by CEG, and the promoter of the 'blue land', would include a primary school together with local services to meet the day-to-day needs of the residents/occupiers of the new neighbourhood.

## Environment

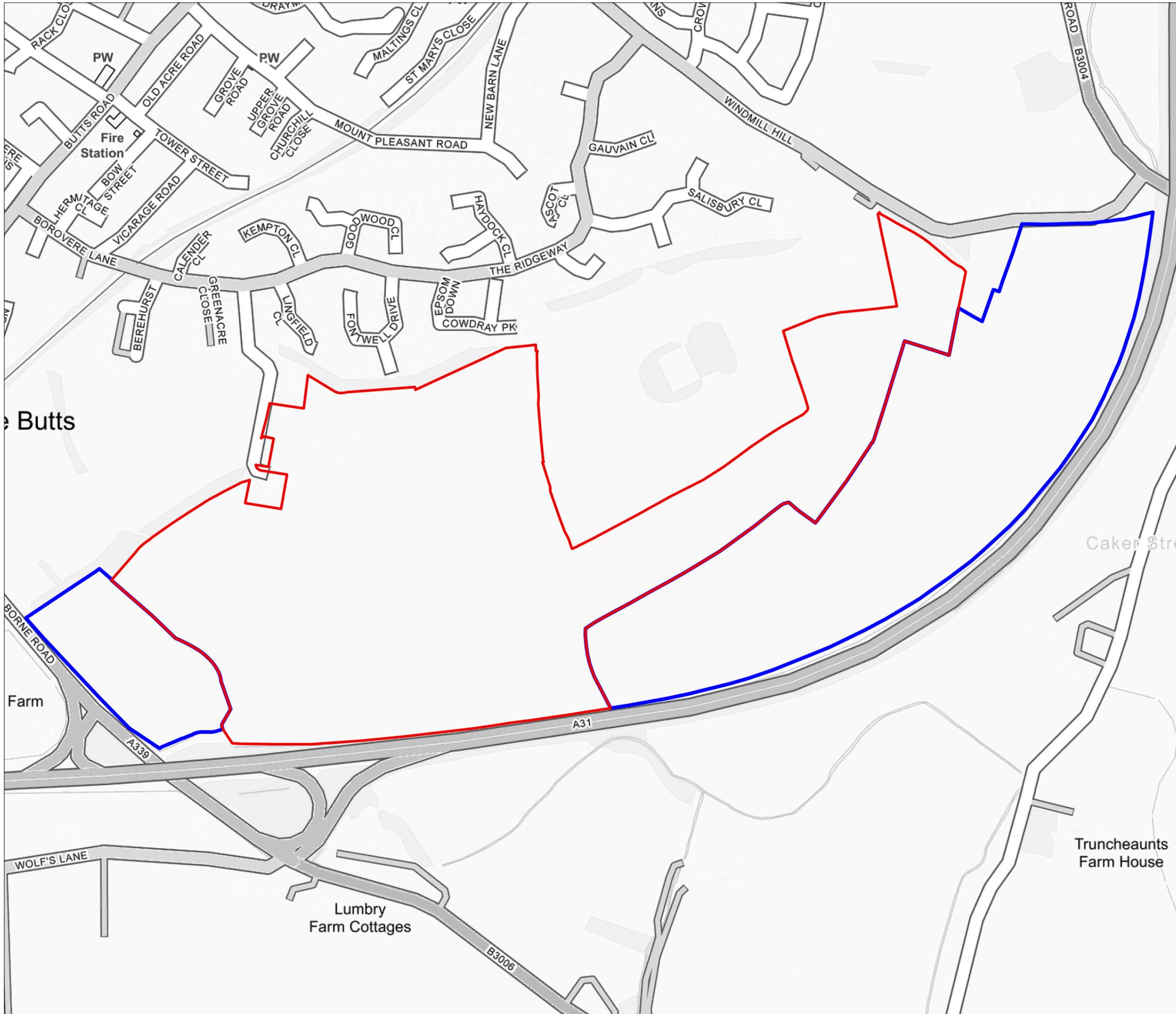
**ENV1** Which of the below environmental considerations is most important to you? Sort in order of importance, from the most important to the least.

- *Achieving improvements to local wildlife habitats;*
  - *Protecting the most vulnerable existing protected habitats and species;*
  - *Conserving the character of rural landscapes;*
  - *Creating better natural links between existing habitats*
46. CEG considers that protecting and promoting biodiversity is integral to creating new spaces and a high-quality place to live and work. Accordingly, the priority is:
- Protecting the most vulnerable existing protected habitats and species;
  - Achieving improvements to local wildlife habitats;
  - Creating better natural links between existing habitats; and
  - Conserving the character of rural landscapes.

Version: Final

Date: 16 January 2023

## **Appendix 1**



Key

Land to be promoted by CEG	<span style="color: red;">▬</span>	31.54 ha
Land to be promoted by 3rd Party	<span style="color: blue;">▬</span>	21.85 ha
Total Area		53.39 ha

Revisions

A	13/01/2023	JR
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Land south of Alton  
CEG

Land Interests

Status:

Scale @ A3:	1:5000	Date:
		13/01/2023
		Revision:
		A

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# THAKEHAM

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

By email only: [localplan@easthants.gov.uk](mailto:localplan@easthants.gov.uk)

16 January 2023

Dear Sir / Madam,

**East Hampshire Local Plan 2021 – 2040 Issues and Priorities: Regulation 18 Part 1  
Representations on behalf of Thakeham Homes**

Thakeham Homes Limited ('Thakeham') is writing in response to the East Hampshire Local Plan 2021 – 2040 Issues and Priorities: Regulation 18 – Part 1 Consultation ("Reg 18 Part 1"). Thakeham has interests across East Hampshire. Thakeham has an Option over Land South of Five Head Road, Horndean, hereinafter referred to as "the Site", and these representations are made in specific response to the Reg P18 Part 1 and the specific issues in the context of Horndean.

**About Thakeham**

Thakeham is a zero carbon, infrastructure-led sustainable placemaker and is committed to creating new, extraordinary communities, where the highest attention to detail makes a positive difference.

Thakeham build for the future, for communities and for individuals. Our approach sets us apart from our competitors. We deliver our schemes with a focus on zero carbon sustainable development, looking ahead of current housing standards. From 2025, all Thakeham Homes will be carbon neutral in construction and zero carbon in lifetime use.

Each development is different and tailored to its locality, with careful consideration of the area's character, as well as the environment. As a sustainable placemaker first and foremost, Thakeham's commitment to improving existing communities means its schemes are design and infrastructure-led; engaging with education, highways, healthcare, utilities and other stakeholders from the start of a project. The delivery of homes facilitates the delivery of physical, social and green/blue infrastructure which benefits the wider surrounding area, as well as the new residents, and ensures that Thakeham create sustainable places to live and work.

The Environment Bill sets out Government's target of 10% Biodiversity Net Gain across development sites. However, through our landscaping approach, we will seek to achieve 20% Biodiversity Net Gain, including hedgehog highways, year-round variation for wildlife, as well as green and blue infrastructure, open space and play space.

We will engage local primary schools with our 'Eddie & Ellie's Wild Adventures' initiative to promote the importance of ecology and biodiversity, delivering National Curriculum linked activities and early career-based learning.

At every stage, our approach is one that ensures we leave a legacy behind that everyone can be proud of.

Thakeham design all homes to be beautiful and reflect the character of the area. The materials used across all developments are of the highest quality. Thakeham builds all developments tenure blind to ensure no drop off in quality.

As one of 12 members of the NHS Healthy New Towns network, Thakeham is a committed advocate of developing healthy places in line with the Healthy New Town principles. But over time, we have realised that these principles are just the starting blocks, and at Thakeham we are committed to delivering sustainable, zero carbon communities.

Our level of commitment to sustainability means that we are streets ahead of our competitors and aiming for a far higher level of impact. Thakeham has become the first housebuilder in the UK, and one of only five in the construction sector globally to have made commitments on the SME Climate Hub and be part of the United Nations' Race To Zero campaign. As part of this, we have committed to the SME Climate Commitment. Recognising that climate change poses a threat to the economy, nature and society-at-large, our company has pledged to take action immediately in order to halve our greenhouse gas emissions before 2030, achieve net zero emissions before 2050, and to disclose our progress on a yearly basis. Our sites will include the following sustainability improvements:

- All Thakeham homes will be carbon neutral in production and zero carbon in lifetime operation by 2025. This puts us well ahead of the pledges we have made as referred to above.
- On all Thakeham developments we follow industry best-practice by taking a 'fabric first approach', which looks at how design and materials can contribute to the energy performance of the completed building.
- We will also consider the potential for incorporating sustainable energy features, such as air-source or ground-source heat pumps, communal rainwater recycling, solar panels, battery storage, renewable energy tariffs, and highly efficient heating and hot water systems.
- Thakeham uses a UK-based factory which manufactures panels using timber from sustainable sources. The off-site panelised system improves efficiency, speed of construction, quality, and reduces carbon emissions.

- Our Sustainable Procurement Policy encourages the use of recycled materials, such as otherwise nonrecyclable waste plastics (One tonne of MacRebur tarmac mix contains the equivalent of 80,000 plastic bottles), as well as utilise products part of a circular economy.
- We ensure that our whole supply chain is as local as possible. We have gold membership with the Supply Chain Sustainability School.
- On site, we monitor and aim to minimise construction travel emissions, construction waste and energy consumption and are registered with the Considerate Constructors Scheme.

Our approach sets us apart from our competitors. We deliver our schemes with a focus on sustainable development, looking ahead of current housing standards.

### **Response to consultation**

Thakeham has reviewed the Reg 18 Part 1 and has chosen key issues relevant to its interests within the authority area, and in particular to Horndean, on which to provide specific comments.

By way of general commentary Thakeham supports the approach taken by the Council in preparing its Local Plan and the early engagement that has taken place.

We fully support the vision and its ambition that *“By 2040 residents will live in healthy, accessible and inclusive communities, where quality homes, local facilities and employment opportunities provide communities with green and welcoming places to live, work and play and respond positively to the climate emergency.*

We strongly support the identification of the key issues identified in OV1 and consider the 5 key issues of Climate Emergency, Environment, Population and Housing, Types of Housing Needs and Infrastructure are all equally important.

### **Issue: Climate Emergency**

Thakeham’s core principles relate to zero carbon, infrastructure-led sustainable placemaking and we are fully supportive of the Council’s ambitions to tackle the climate emergency. We have also been liaising with the Council as part of its Net Zero Carbon study.

In term of CLIM1 we consider that developments should achieve net zero carbon in operational (regulated) emissions using the government’s Standard Assessment Procedure. In respect of the items listed is CLIM2, we believe they should be ranked as follows;

1. That all new buildings should be zero carbon.
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. 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.

In respect of CLIM3 and CLIM3a we agree, but it should be recognised that a development-scale definition may mean some homes over-achieve where the roof orientation can be maximised for photovoltaic panels, whereas some may underachieve. We therefore suggest the Council should ensure that the definition of “net-zero carbon development” is clearer by rewording the first bullet point to “The regulated energy consumed by a building(s) occupant(s) is...”.

We agree with CLIM4, however the Energy Hierarchy has traditionally represented ‘lean’ as reducing operational energy use, ‘clean’ as supply energy efficiently, and ‘green’ as using renewable energy. This original hierarchy was first implemented by the GLA, and should be consistently copied to avoid confusion. Thus in respect of CLIM4a we believe the original Energy Hierarchy should be followed.

With regards to CLIM5 we agree that criteria for tackling climate change should be included in the emerging Local Plan, future Neighbourhood Plan and in Local Design Codes. In respect of CLIM5a it is important to reference the climate emergency as a golden thread throughout to ensure policies and guidance don’t conflict with each other. For example, a local design code may encourage roof styles or orientation through road layouts that are incompatible with producing net zero carbon homes by limiting the amount of photovoltaic panels at maximum efficiency.

In terms of CLIM6 and CLIM6a, we are fully supportive (very happy) of the living locally principle to influence the locations of new homes. Thakeham are passionate about our ability to influence communities in living more sustainable lifestyles. Not just through the energy efficiency of new homes, but through enabling active transport, low carbon travel, and providing facilities within a local neighbourhood. We do, however, recognise that there doesn’t exist a framework or methodology for the district to effectively enforce or monitor the outcomes of a 20-minute neighbourhood. We would be happy to work with the Council to support in this regard, helping to lead the way.

### **Issue: Population and Housing**

Meeting future housing needs is a central objective for all Local Plans. With regards to POP1 and POP1a we strongly agree that the standard method should be the basis for calculating housing needs. Increasing overall housing delivery is one of the Government’s long standing key priorities for the planning system in England, and utilising this method will ensure the new Local Plan meets its minimum housing needs and should be found sound and adopted without further delay. We agree with the Council’s evidence and Technical Note that there are no exceptional circumstances in East Hampshire to warrant the use of an alternative methodology.

In respect of POP2 and POP2a we consider the Council should do more to meet its housing needs. The Council should note that the Standard Method need calculated represents the minimum number of homes to be planned for in accordance with national policy.

The Council identifies that there is an annual need for 517 homes per annum within the areas of East Hampshire outside the South Downs National Park (SDNP) and 115 homes per annum for those areas within SDNP. 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.

The affordability ratio within the District is high at 14.51, and as is noted in later sections, there is a high need for more affordable housing and the Council's own analysis shows a total need for 613 new affordable homes across the District per year, which equates to 97% of the standard method local housing need figure of 632. The suggested housing target of 517 homes per year will only exacerbate the affordability issues within the District and the Council should seek to increase the minimum target to ensure additional affordable homes are delivered. Sufficient market homes will aid the delivery of new affordable homes. The required affordable homes are unlikely to be delivered without the market homes alongside. The quantum of market houses needs to increase to reduce the affordability ratio. Therefore, the Council should seek to exceed the current minimum target of 517 homes per year.

In terms of POP3 and POP3a we believe the Council should seek to meet and exceed its full minimum housing needs, (all the housing needs of East Hampshire including the area within SDNP), given the high affordability ratio and need for affordable housing within the District. As noted above the current figure of 115 homes per annum for SDNP will result in a future shortfall. The Council needs to work closely with SDNP 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.

In respect of POP4 and POP4a the Council should 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 areas adjoining Havant could deliver more housing to address some of Havant's unmet needs. In addition, there are unmet needs also arising in a number of other areas including Portsmouth, Southampton, and Gosport. 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 East Hampshire cannot meet all of these needs it should be looking at developing a spatial strategy that would meet some these needs.

It is important to recognise that the impact of neighbouring authorities failing to meet needs has wider impacts and for East Hampshire it will mean that the housing growth it proposes will have less impact on the rising cost of housing. As noted above the area already suffers from poor affordability. The situation will not improve if insufficient housing is not provided.

With respect of HOU1, housing for older persons we consider that the Council should ensure it is meeting its housing needs and therefore a tailored policy is appropriate. In respect of HOU4 we generally agree a tailored policy for adaptable homes on larger sites is also appropriate.

In respect of HOU5 – HO6a, 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. Whilst the Local Plan should set out policies which aim to deliver a mix of new homes in accordance with needs identified within the HEDNA, (and any subsequent updated assessment) this should allow flexibility and not be applied rigidly. Whilst we consider that good design can ensure that an appropriate mix can be delivered on all sites, we consider that on sites of less than 10 units this may be more of a challenge and would therefore agree that it should only apply to large development sites.

With regards to affordable housing, the Council has identified within its own analysis there is a chronic need for more affordable homes. It also acknowledges that the amount of affordable housing delivered in new development will be limited to the amount that can viably be provided alongside other associated infrastructure requirements. The Council's recent Affordable Housing Strategy 2022 – 2025 notes that the current requirements work well, and notes a healthy supply of new affordable homes, but highlights fluctuations in completion rates. Furthermore, it sets out that the Council can address shortfalls in affordable housing delivery by either developing itself or by providing financial support. In response to HOU7 no new viability testing work has yet been undertaken, but we consider that the 40% requirement is about the right amount however the Council will need to undertake its own viability assessments.

At Thakeham we ensure new affordable homes are tenure blind and fully integrated into our developments throughout the scheme. We are committed to the delivery of new affordable homes as part of our developments.

## **Issues: Environment**

We recognise the importance of the natural environment. The places we create give priority to green and blue infrastructure and nature, delivering net biodiversity and supporting local wildlife. A truly landscape-led approach creates a super-connected, regenerative and resilient environment and has wide-reaching benefits, including helping to reduce pollution, improve habitats and increase mental and physical health and wellbeing. Nature Recovery is important to Thakeham and we are working to halt biodiversity loss, provide resilient habitats and educate young people about wildlife. Biodiversity-focused landscaping forms a key part of our proposal, and will provide a net gain for biodiversity as well as increasing people's connection

to nature. As set out above, the delivery of new homes facilitates the delivery of new green and blue infrastructure which benefits not only new residents living within those developments, but those living and working in the surrounding area too.

With regards to ENV1 we consider these should be ranked as follows; the least.

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

In response to CFS2 and nutrient neutrality, it should be noted that our Site at Land South of Five Heads Road, Horndean is located within the broader Solent catchment where nutrient neutrality will be required. We have undertaken a nutrient assessment based on scheme of 125 dwellings, and this confirms that the Site has favourable characteristics from a nutrient budgeting perspective and a scheme comprising 125 homes together with new open spaces would be nutrient neutral. Thus if this Site were allocated for 125 homes it would not require any alternative off-site mitigation for nutrient neutrality.

#### **Issue: Infrastructure**

In response to INF1 we believe the delivery all types of infrastructure are considered equally important to ensure the delivery of sustainable new communities. In response to INF2 we note we note the funds which have been given to improvements to the Five Head Playground and Horndean Technology College Tennis Courts. With regards to INF3 and INF3a we believe all sizes of development can make an important contribution to infrastructure, small sites can deliver this via CIL were as medium and larger sites have the potential to deliver necessary infrastructure on site as well as via CIL.

#### **Issue: Development Strategy and Spatial Distribution**

Thakeham fully support seeking to direct new development to the most sustainable and accessible locations, making the most of opportunities to increase walking and cycling as modes of transport, and supporting and enhancing existing and new facilities and services. Our commitment to zero-carbon placemaking goes beyond the building fabric of the zero-carbon house and takes a holistic view on creating sustainable communities. Our principles ensure walking and cycling is the best way to travel and ensure people and nature interact harmoniously for the benefit of residents and their environment, and they deliver places that support communities by meeting their everyday needs close to their homes.

We generally support the methodology within the updated Settlement Hierarchy.

In terms of DEV1 – DEV3, we have significant concerns regarding Option 4: Concentrate development in a new settlement +1,500 homes. Whilst we do not dispute that large strategic sites are a suitable mechanism of delivering large scale housing, we have concerns that such

a site is unlikely to provide sufficient delivery within the Plan period and in light of the existing shortfall of housing within the District a focused effort is required to ensure suitable sites are allocated to deliver early within Plan period.

We suggest a more holistic approach is required to the spatial distribution, which blends Options 1 – 3, primarily focusing development in the largest most sustainable settlements (Option 2) but also ensuring the needs of rural communities is met (Option 1). Simply distributing new development by existing population alone (Option 3) may not focus the right quantum of new homes in the right places, although we accept that some proportionate growth is necessary to support rural communities.

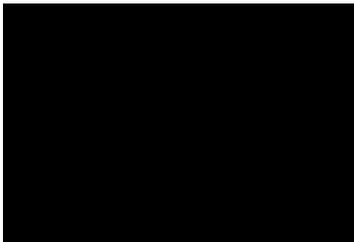
## **Summary**

Thakeham are passionate about our ability to influence communities in living more sustainable lifestyles. Not just through the energy efficiency of new homes, but through enabling active transport, low carbon travel, and providing facilities and green infrastructure improvements within a local neighbourhood. These principles closely align with the vision and priorities within the Reg 18 Part 1. Thakeham supports the creation of the new Local Plan and looks forward to engaging further in the future stages and consultations.

Thakeham submits Land South of Five Head Road, Horndean as suitable, available and achievable, and considers it can make a valuable contribution to the local area and the housing needs of the District. We therefore request that due consideration is given to the allocation of this Site within the Local Plan.

We trust that these representations will be useful, and we would be grateful for confirmation of receipt. Please do not hesitate to contact me if you have any queries or require any further information.

Yours faithfully



Enc.

Vision Document Land South of Five Head Road, Horndean



# THAKEHAM

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

By email only: [localplan@easthants.gov.uk](mailto:localplan@easthants.gov.uk)

16 January 2023

Dear Sir / Madam,

**East Hampshire Local Plan 2021 – 2040 Issues and Priorities: Regulation 18 Part 1  
Representations on behalf of Thakeham Homes**

Thakeham Homes Limited ('Thakeham') is writing in response to the East Hampshire Local Plan 2021 – 2040 Issues and Priorities: Regulation 18 – Part 1 Consultation ("Reg 18 Part 1"). Thakeham has interests across East Hampshire. Thakeham is the landowner of Land West of Telegraph Lane & South of Alton Lane, Four Marks, and these representations are made in specific response to the Reg P18 Part 1 and the specific issues in the context of Four Marks.

**About Thakeham**

Thakeham is a zero carbon, infrastructure-led sustainable placemaker and is committed to creating new, extraordinary communities, where the highest attention to detail makes a positive difference.

Thakeham build for the future, for communities and for individuals. Our approach sets us apart from our competitors. We deliver our schemes with a focus on zero carbon sustainable development, looking ahead of current housing standards. From 2025, all Thakeham Homes will be carbon neutral in construction and zero carbon in lifetime use.

Each development is different and tailored to its locality, with careful consideration of the area's character, as well as the environment. As a sustainable placemaker first and foremost, Thakeham's commitment to improving existing communities means its schemes are design and infrastructure-led; engaging with education, highways, healthcare, utilities and other stakeholders from the start of a project. The delivery of homes facilitates the delivery of physical, social and green/blue infrastructure which benefits the wider surrounding area, as well as the new residents, and ensures that Thakeham create sustainable places to live and work.

The Environment Bill sets out Government's target of 10% Biodiversity Net Gain across development sites. However, through our landscaping approach, we will seek to achieve 20% Biodiversity Net Gain, including hedgehog highways, year-round variation for wildlife, as well as green and blue infrastructure, open space and play space.

We will engage local primary schools with our 'Eddie & Ellie's Wild Adventures' initiative to promote the importance of ecology and biodiversity, delivering National Curriculum linked activities and early career-based learning.

At every stage, our approach is one that ensures we leave a legacy behind that everyone can be proud of.

Thakeham design all homes to be beautiful and reflect the character of the area. The materials used across all developments are of the highest quality. Thakeham builds all developments tenure blind to ensure no drop off in quality.

As one of 12 members of the NHS Healthy New Towns network, Thakeham is a committed advocate of developing healthy places in line with the Healthy New Town principles. But over time, we have realised that these principles are just the starting blocks, and at Thakeham we are committed to delivering sustainable, zero carbon communities.

Our level of commitment to sustainability means that we are streets ahead of our competitors and aiming for a far higher level of impact. Thakeham has become the first housebuilder in the UK, and one of only five in the construction sector globally to have made commitments on the SME Climate Hub and be part of the United Nations' Race To Zero campaign. As part of this, we have committed to the SME Climate Commitment. Recognising that climate change poses a threat to the economy, nature and society-at-large, our company has pledged to take action immediately in order to halve our greenhouse gas emissions before 2030, achieve net zero emissions before 2050, and to disclose our progress on a yearly basis. Our sites will include the following sustainability improvements:

- All Thakeham homes will be carbon neutral in production and zero carbon in lifetime operation by 2025. This puts us well ahead of the pledges we have made as referred to above.
- On all Thakeham developments we follow industry best-practice by taking a 'fabric first approach', which looks at how design and materials can contribute to the energy performance of the completed building.
- We will also consider the potential for incorporating sustainable energy features, such as air-source or ground-source heat pumps, communal rainwater recycling, solar panels, battery storage, renewable energy tariffs, and highly efficient heating and hot water systems.
- Thakeham uses a UK-based factory which manufactures panels using timber from sustainable sources. The off-site panelised system improves efficiency, speed of construction, quality, and reduces carbon emissions.

- Our Sustainable Procurement Policy encourages the use of recycled materials, such as otherwise nonrecyclable waste plastics (One tonne of MacRebur tarmac mix contains the equivalent of 80,000 plastic bottles), as well as utilise products part of a circular economy.
- We ensure that our whole supply chain is as local as possible. We have gold membership with the Supply Chain Sustainability School.
- On site, we monitor and aim to minimise construction travel emissions, construction waste and energy consumption and are registered with the Considerate Constructors Scheme.

Our approach sets us apart from our competitors. We deliver our schemes with a focus on sustainable development, looking ahead of current housing standards.

### **Response to consultation**

Thakeham has reviewed the Reg 18 Part 1 and has chosen key issues relevant to its interests within the authority area, and in particular to Four Marks, on which to provide specific comments.

By way of general commentary Thakeham supports the approach taken by the Council in preparing its Local Plan and the early engagement that has taken place.

We fully support the vision and its ambition that *“By 2040 residents will live in healthy, accessible and inclusive communities, where quality homes, local facilities and employment opportunities provide communities with green and welcoming places to live, work and play and respond positively to the climate emergency.*

We strongly support the identification of the key issues identified in OV1 and consider the 5 key issues of Climate Emergency, Environment, Population and Housing, Types of Housing Needs and Infrastructure are all equally important.

### **Issue: Climate Emergency**

Thakeham’s core principles relate to zero carbon, infrastructure-led sustainable placemaking and we are fully supportive of the Council’s ambitions to tackle the climate emergency. We have also been liaising with the Council as part of its Net Zero Carbon study.

In term of CLIM1 we consider that developments should achieve net zero carbon in operational (regulated) emissions using the government’s Standard Assessment Procedure. In respect of the items listed is CLIM2, we believe they should be ranked as follows;

1. That all new buildings should be zero carbon.
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. 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.

In respect of CLIM3 and CLIM3a we agree, but it should be recognised that a development-scale definition may mean some homes over-achieve where the roof orientation can be maximised for photovoltaic panels, whereas some may underachieve. We therefore suggest the Council should ensure that the definition of “net-zero carbon development” is clearer by rewording the first bullet point to “The regulated energy consumed by a building(s) occupant(s) is...”.

We agree with CLIM4, however the Energy Hierarchy has traditionally represented ‘lean’ as reducing operational energy use, ‘clean’ as supply energy efficiently, and ‘green’ as using renewable energy. This original hierarchy was first implemented by the GLA, and should be consistently copied to avoid confusion. Thus in respect of CLIM4a we believe the original Energy Hierarchy should be followed.

With regards to CLIM5 we agree that criteria for tackling climate change should be included in the emerging Local Plan, future Neighbourhood Plan and in Local Design Codes. In respect of CLIM5a it is important to reference the climate emergency as a golden thread throughout to ensure policies and guidance don’t conflict with each other. For example, a local design code may encourage roof styles or orientation through road layouts that are incompatible with producing net zero carbon homes by limiting the amount of photovoltaic panels at maximum efficiency.

In terms of CLIM6 and CLIM6a, we are fully supportive (very happy) of the living locally principle to influence the locations of new homes. Thakeham are passionate about our ability to influence communities in living more sustainable lifestyles. Not just through the energy efficiency of new homes, but through enabling active transport, low carbon travel, and providing facilities within a local neighbourhood. We do, however, recognise that there doesn’t exist a framework or methodology for the district to effectively enforce or monitor the outcomes of a 20-minute neighbourhood. We would be happy to work with the Council to support in this regard, helping to lead the way.

### **Issue: Population and Housing**

Meeting future housing needs is a central objective for all Local Plans. With regards to POP1 and POP1a we strongly agree that the standard method should be the basis for calculating housing needs. Increasing overall housing delivery is one of the Government’s long standing key priorities for the planning system in England, and utilising this method will ensure the new Local Plan meets its minimum housing needs and should be found sound and adopted without further delay. We agree with the Council’s evidence and Technical Note that there are no exceptional circumstances in East Hampshire to warrant the use of an alternative methodology.

In respect of POP2 and POP2a we consider the Council should do more to meet its housing needs. The Council should note that the Standard Method need calculated represents the minimum number of homes to be planned for in accordance with national policy.

The Council identifies that there is an annual need for 517 homes per annum within the areas of East Hampshire outside the South Downs National Park (SDNP) and 115 homes per annum for those areas within SDNP. 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.

The affordability ratio within the District is high at 14.51, and as is noted in later sections, there is a high need for more affordable housing and the Council's own analysis shows a total need for 613 new affordable homes across the District per year, which equates to 97% of the standard method local housing need figure of 632. The suggested housing target of 517 homes per year will only exacerbate the affordability issues within the District and the Council should seek to increase the minimum target to ensure additional affordable homes are delivered. Sufficient market homes will aid the delivery of new affordable homes. The required affordable homes are unlikely to be delivered without the market homes alongside. The quantum of market houses needs to increase to reduce the affordability ratio. Therefore the Council should seek to exceed the current minimum target of 517 homes per year.

In terms of POP3 and POP3a we believe the Council should seek to meet and exceed its full minimum housing needs, (all the housing needs of East Hampshire including the area within SDNP), given the high affordability ratio and need for affordable housing within the District. As noted above the current figure of 115 homes per annum for SDNP will result in a future shortfall. The Council needs to work closely with SDNP 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.

In respect of POP4 and POP4a the Council should 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 areas adjoining Havant could deliver more housing to address some of Havant's unmet needs. In addition, there are unmet needs also arising in a number of other areas including Portsmouth, Southampton, and Gosport. 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 East Hampshire cannot meet all of these needs it should be looking at developing a spatial strategy that would meet some these needs.

It is important to recognise that the impact of neighbouring authorities failing to meet needs has wider impacts and for East Hampshire it will mean that the housing growth it proposes will have less impact on the rising cost of housing. As noted above the area already suffers from poor affordability. The situation will not improve if insufficient housing is not provided.

With respect of HOU1, housing for older persons we consider that the Council should ensure it is meeting its housing needs and therefore a tailored policy is appropriate. In respect of HOU4 we generally agree a tailored policy for adaptable homes on larger sites is also appropriate.

In respect of HOU5 – HO6a, 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. Whilst the Local Plan should set out policies which aim to deliver a mix of new homes in accordance with needs identified within the HEDNA, (and any subsequent updated assessment) this should allow flexibility and not be applied rigidly. Whilst we consider that good design can ensure that an appropriate mix can be delivered on all sites, we consider that on sites of less than 10 units this may be more of a challenge, and would therefore agree that it should only apply to large development sites.

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We recognise the importance of the natural environment. The places we create give priority to green and blue infrastructure and nature, delivering net biodiversity and supporting local wildlife. A truly landscape-led approach creates a super-connected, regenerative and resilient environment and has wide-reaching benefits, including helping to reduce pollution, improve habitats and increase mental and physical health and wellbeing. Nature Recovery is important to Thakeham and we are working to halt biodiversity loss, provide resilient habitats and educate young people about wildlife. Biodiversity-focused landscaping forms a key part of our proposal and will provide a net gain for biodiversity as well as increasing people's connection

to nature. As set out above, the delivery of new homes facilitates the delivery of new green and blue infrastructure which benefits not only new residents living within those developments, but those living and working in the surrounding area too.

With regards to ENV1 we consider these should be ranked as follows; the least.

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

### **Issue: Infrastructure**

In response to INF1 we believe the delivery all types of infrastructure are considered equally important to ensure the delivery of sustainable new communities. In response to INF2 we note the significant funds which has been allocated to the new Community Building and Recreation Hub within Four Marks. With regards to INF3 and INF3a we believe all sizes of development can make an important contribution to infrastructure, small sites can deliver this via CIL were as medium and larger sites have the potential to deliver necessary infrastructure on site as well as via CIL.

### **Issue: Development Strategy and Spatial Distribution**

Thakeham fully support seeking to direct new development to the most sustainable and accessible locations, making the most of opportunities to increase walking and cycling as modes of transport, and supporting and enhancing existing and new facilities and services. Our commitment to zero-carbon placemaking goes beyond the building fabric of the zero-carbon house and takes a holistic view on creating sustainable communities. Our principles ensure walking and cycling is the best way to travel and ensure people and nature interact harmoniously for the benefit of residents and their environment, and they deliver places that support communities by meeting their everyday needs close to their homes.

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In terms of DEV1 – DEV3, we have significant concerns regarding Option 4: Concentrate development in a new settlement +1,500 homes. Whilst we do not dispute that large strategic sites are a suitable mechanism of delivering large scale housing, we have concerns that such a site is unlikely to provide sufficient delivery within the Plan period and in light of the existing shortfall of housing within the District a focused effort is required to ensure suitable sites are allocated to deliver early within Plan period.

We suggest a more holistic approach is required to the spatial distribution, which blends Options 1 – 3, primarily focusing development in the largest most sustainable settlements (Option 2) but also ensuring the needs of rural communities is met (Option 1). Simply distributing new development by existing population alone (Option 3) may not focus the right

quantum of new homes in the right places, although we accept that some proportionate growth is necessary to support rural communities.

## Summary

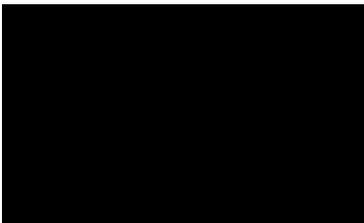
Thakeham are passionate about our ability to influence communities in living more sustainable lifestyles. Not just through the energy efficiency of new homes, but through enabling active transport, low carbon travel, and providing facilities and green infrastructure improvements within a local neighbourhood. These principles closely align with the vision and priorities within the Reg 18 Part 1. Thakeham supports the creation of the new Local Plan and looks forward to engaging further in the future stages and consultations.

Thakeham submits Land West of Telegraph Lane & South of Alton Lane, Four Marks as suitable, available and achievable, and considers it can make a valuable contribution to the local area and the housing needs of the District. We therefore request that due consideration is given to the allocation of this site within the Local Plan.

You may recall that Land West of Telegraph Lane & South of Alton Lane, Four Marks was previously promoted as part of a larger site known as Four Marks South Large Site. This was undertaken at the Council's request as part of the previous Regulation 18 consultation. We understand that there may have been divergence locally regarding this potential large site, although no formal feedback was received from the workshop held in 2022. Therefore, we have developed the attached Vision Document to clearly demonstrate how our site can come forward as a standalone site, and could deliver much needed new homes, reflecting the character of the existing settlement and the built form associated with the two adjoining lanes.

We trust that these representations will be useful, and we would be grateful for confirmation of receipt. Please do not hesitate to contact me if you have any queries or require any further information.

Yours faithfully



Enc.

Vision Document Land West of Telegraph Lane & South of Alton Lane, Four Marks

**Local Plan Representations**  
Land south of Drift Road, Clanfield

January 2023

# Contents

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1.	Introduction	1
2.	Site Overview	2
3.	Suitability of the Site for Development	5
4.	Response to Local Plan Options	8
5.	Summary	11
Appendix 1: Vision Document		12

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**Client**  
Bellway Homes Ltd (Wessex Division)

**Our reference**  


16 Jan 2023

# 1. Introduction

- 1.1 These representations have been prepared to respond to the East Hampshire Local Plan 2021-2040 Issues and Priorities Regulation 18 – Part 1 consultation on behalf of our client Bellway Homes Ltd (Wessex).

## **Purpose of these Representations**

- 1.2 East Hampshire District Council (hereafter referred to as ‘the Council’) are preparing a new Local Plan ‘Better Homes, Better Places’ and are undertaking a Regulation 18 consultation (hereafter referred to as ‘the Reg 18 Plan’) to seek views on the main issues that the plan will need to address.
- 1.3 Our client has land interests to the Land South of Drift Road, Clanfield (hereafter referred to as ‘the Site’) which offers significant potential to deliver a high quality and highly sustainable residential development to meet extensive housing needs ,alongside associated community benefits.
- 1.4 The structure of these representations are as follows:
- Site Overview
  - Suitability of the Site for Developpment
  - Response to Local Plan Options
  - Summary
- 1.5 These representations are supported by a Vision Document produced by Turley on behalf of Bellway Homes Ltd (Wessex) which sets out the vision for the development of the Site as well as give commentary on technical matters such as highways, ecology, drainage and landscape impact and explain how these have informed the proposals for the Site and their design. The Vision Document is included at Appendix 1.

## 2. Site Overview

2.1 This section provides context to the Site which our client has interests in.

### Land South of Drift Road Clanfield

2.2 The Site is located to the south-west of the main built-up area of the village of Clanfield, immediately adjacent to the settlement policy boundary as defined within the Local Plan (Part 2): Housing and Employment Allocations (hereafter referred as ‘the adopted Plan’). The Site is currently used for arable farming.

2.3 The Site is bound to the north by Drift Road; to the east by a neighbourhood centre containing a Co-Op convenience store and integrated post office, a GP surgery and a church accessed via large car park adjacent to White Dirt Lane; to the south also by White Dirt Lane, along with an existing dwelling and storage building accessed via Glamorgan Road and other agricultural fields; and to the west by agricultural fields and ancillary agricultural buildings.

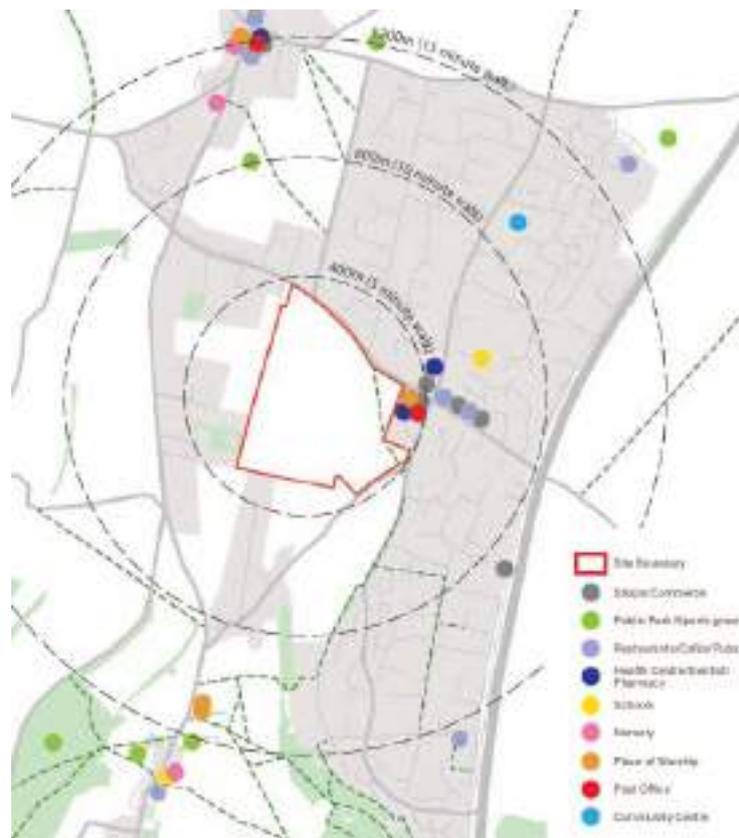


Figure 1 Site location and distance to local services

2.4 The Site’s boundaries themselves comprise a mix of trees, hedges, low lying shrubs and other vegetation. The Site is visible from adjacent roads including Drift Road and White Dirt Lane.

2.5 The Site does not benefit from a formal access point onto the local road network but is located adjacent to both Drift Road and White Dirt Lane which could provide potential

points of vehicular and pedestrian access subject to the assessment of a qualified transport engineer.

2.6 The Site is subject to the following constraints and opportunities

- The Site is located in Flood Zone 1 according to the Government's flood risk map for planning and is therefore considered to be at low risk of fluvial flooding. The Site is also considered to be at very low risk from surface water flooding. There are however areas of low risk to the north of the Site on Drift Road and areas varying from low to high risk to the east of the Site on White Dirt Lane.
- The Site is itself not subject to any international or national designations for biodiversity value according to DEFRA's Magic website. However, the Site is located approximately 1 kilometre to the north-east of the Catherington Down Site of Special Scientific Interest (SSSI) and Local Nature Reserve (LNR) and 900 metres to the north east of the Catherington Lith LNR.
- The Site is not the subject of any national heritage asset designations according to Historic England's website. The site is not within the setting of any heritage assets.
- The Site and its boundaries are not the subject of any Tree Preservation Order (TPO).
- There is a Public Right of Way (Route Number: 119/49/1), designated as a footpath, running across the north-east corner of the Site, linking Drift Road to White Dirt Lane.

### **Surrounding Area**

2.7 In terms of the Site's wider area, to the north and east are the built-up area of Clanfield which is mainly residential in character. A number of local services are located within the small neighbourhood centre and elsewhere near to the roundabout connecting Drift Road with White Dirt Lane to the immediate north-east of the Site. In addition to those already mentioned immediately adjacent to the Site within the small neighbourhood centre, there are also several local retail units, restaurants and cafes as well as a pharmacy, opticians and another convenience store. All are within short walking distance as identified in Figure 1 above.

2.8 Petersgate Infant School is located approximately 250 metres (8 minute walk) to the north-east of the Site whilst the Clanfield Community Centre is located approximately 650 metres to the north-east. Clanfield Junior School is located approximately 1 kilometre to the north-west of the Site. The nearest secondary school is Horndean Technology College located approximately 2.3 kilometres to the south of the Site in Horndean.

2.9 The wider area to the south and west comprises agricultural fields, farm buildings, a nursery, beyond which are linear arrangements of housing along Downhouse Road and Glamorgan Road.

- 2.10 Clanfield is located adjacent to the A3 and so the Site benefits from good access to the Strategic Road Network including the A3 and nearby A3(M) which provide onward connections to Guildford and London to the north and Portsmouth to the south with onward connections to Southampton via the M27.
- 2.11 With regards to public transport there are bus stops located adjacent to the Site on Drift Road. Service 8 departs from Drift Road and provides direct connection into Portsmouth every 20-minutes. There are also services 37, 37x and 637. These allow for direct access into Petersfield to the north and Waterlooville to the south with services roughly every hour.
- 2.12 The nearest train stations are those at Bedhampton, Havant and Petersfield which are served by regular trains to London and Portsmouth and other local and regional destinations.
- 2.13 The Site is located in a wider landscape of rolling hills. The Site rises from a low point of around 90 metres AOD on the eastern boundary closest to the neighbourhood centre, up to a ridge of around 120 metres AOD on the south-western part of the Site, forming part of a wider plateau whilst falling away to around 110 metres AOD to the north-west.
- 2.14 There are two electricity pylons located close to the southern edge of the Site which connect high voltage cables running east to west across the Site

### **Planning History**

- 2.15 Based on the information available from EHDC's online planning portal there is no planning history for the Site.

### 3. Suitability of the Site for Development

- 3.1 This section should be read in conjunction with the attached Vision Document at Appendix 1 which provides more related details and visual supporting material, including technical matters such as drainage and utilities.

#### **Sustainable Location**

- 3.2 The Site is well located to local services and public transport and is within walking distance of a number of facilities and services at the adjacent neighbourhood centre. There is direct access to frequent bus services larger facilities and services in Horndean, Waterlooville and Portsmouth.
- 3.3 This level of locational sustainability is likely to maximise the opportunity for the use of non-car transport modes as part of any future development and is a considerable benefit to identifying the Site as an allocation for residential development.

#### **Provision of Market and Affordable Housing**

- 3.4 We are promoting the Site for residential development of approximately 280 homes to respond to local housing needs. This level of provision is considered consistent with the role of Clanfield within the settlement hierarchy.
- 3.5 In the adopted Local Plan, Clanfield is identified as a Small Local Service Centre that will continue to need to deliver housing in line with its role in the settlement hierarchy, and location within the southern parishes forming part of the wider Planning for South Hampshire (PfSH). This is reflected by the housing allocations for the village in both the adopted Local Plan and the draft allocations in the emerging Local Plan.
- 3.6 Affordable housing will be proposed in line with Planning Policy, with current policy requirements indicating 40% provision. The location of affordable housing can be evenly distributed across the development. This is a significant amount of housing that will address an acute affordable need.
- 3.7 This acute need is emphasised within the Reg 18 Plan. East Hampshire is recognised as being *'extremely unaffordable, so affordable housing needs are extremely important'*. Analysis shows a total need for 613 affordable homes per year across East Hampshire, equating to 97% of the standard method local housing need figure (632 per year). Across the whole plan period this equates to a need of 11,647 homes.
- 3.8 The Site offers the potential for lower density housing toward the higher parts of the site, including the provision of bungalows, which would potentially provide accommodation suitable for older persons and/or people with physical disabilities. The Reg 18 Plan acknowledges that *'census projections highlight a growing proportion of people over 65 years in the district'*, and that *'this has implications for the type of housing that needs to be provided through the Local Plan.'*

## **Landscape**

- 3.9 The primary constraints for the Site are its location in the Settlement Gap for Horndean, Catherington and Clanfield (Policy 23 of the adopted Plan), and its wider landscape setting in an area of rolling hills in close proximity to the boundaries of the South Downs National Park.
- 3.10 Bellway Homes Ltd have employed specialist landscape consultants to provide landscape advice in relation to the Site. This has considered key public vantage points and the topography of the site and the wider locality and how it could be successfully developed to maintain the separate visual identity of Horndean, Catherington and Clanfield.
- 3.11 This indicates that in terms of a developable area development should be directed towards the northern and eastern parts of the Site around Drift Road and Godwin Crescent, and adjacent to the neighbourhood centre. This is reflected in the extent of developable area, land use disposition and consequent overall capacity of the site identified in the Vision Document and illustrative masterplan submitted with these representations.
- 3.12 Part of the site would be retained as a farmland corridor to maintain the purposes of the Gap and a woodland and open space buffer is proposed to contain the development in views from the east and the south. The careful consideration of layout will also allow significant street tree planting within the development and allow for supplementary planting to bolster existing boundary vegetation, and further consolidate its limited impact within the landscape.
- 3.13 Given the Site's topography, the extent of development area identified would demonstrate no adverse impact on the Settlement Gap and maintain the separation and visual identity of Horndean, Catherington and Clanfield. The views from White Dirt Lane and Southdown Road highlight the importance of containing any development to fulfil this visual separation function. This development strategy ensures that the impact on the wider landscape setting including the South Downs National Park is limited.

## **Public Open Space**

- 3.14 The higher parts of the site to the west close to the ridgeline, and adjacent to White Dirt Lane to the south, are identified to provide a significant area of public open space in excess of 6.5 hectares. This responds to a recognised deficiency in Clanfield and the wider southern parishes in both the quantity and quality of open space provision, as set out within the Open Space, Sport and Recreation Needs and Opportunities Assessment 2018 to 2028. This could include a community orchard and small picnic area.
- 3.15 Such provision would be of benefit to existing and future residents, and as dedicated public open space offer longer term security in maintaining separation.

## **Ecology/Bio-Diversity Net Gain**

- 3.16 Ecological surveys have been undertaken and shown that the existing boundary trees and hedges provide suitable habitats for protected species. These will be retained, with the exception of some limited removal to provide access. The extensive open space and woodland proposed offer significant opportunities to enhance ecological habitat, as would the use of Sustainable urban drainage to deal with surface water mitigation.
- 3.17 As such, it is considered the proposals will enable the delivery of at least 10% bio-diversity net gain.

## **Design and Density**

- 3.18 Overall, the development would be of a high quality design that would integrate well into the surrounding area. In terms of density, as highlighted within the submitted Vision Document the proposed residential development would be of a density appropriate to the character of the surrounding area. The overall density will vary within the site, with higher density development being located along the primary routes. Lower density development would be located towards the edges of the site to the west to create a transitional edge between the development and the landscaped open space.
- 3.19 In terms of heights, the proposed development includes a range of heights with buildings to the east being 1.5-2.5 storeys in height, with this reducing down to 1-1.5 storeys as the site transitions towards the public open space on the western edge.

## **Transport**

- 3.20 We have appointed specialist highway consultants to undertake initial feasibility studies on transport which demonstrates that safe access and egress to the site can be provided from Drift Road and that there would be no adverse impact on the capacity of the wider highway network. There is also an opportunity for a secondary/emergency access point to be taken from White Dirt Lane.
- 3.21 The existing PRoW that enters the site from White Dirt Lane and connects to Drift Road can be incorporated into the proposals and will help to create a scheme with an integrated and permeable masterplan in terms of walking and/or cycling.

## **Trees**

- 3.22 Existing boundary vegetation and trees are to be retained and supplemented by extensive additional planting, particularly as part of the overall landscape strategy to mitigate wider landscape impacts. In addition, supplementary planting including street trees would be proposed within the residential development.

## 4. Response to Local Plan Options

- 4.1 This section sets out our written representations in response to the Council's Draft Local Plan consultation as published on the Council's website.

### Response to Questions POP1 and POP1a: Housing Needs

- 4.2 We agree that the starting point for assessing housing need is the Standard Method in line with the NPPF and should only be deviated from in exceptional circumstances in line with Planning Practice Guidance (PPG) paragraph ID: 2a-003-20190220. It is noted that, in response to the specific circumstances of East Hampshire containing a large part of the South Downs National Park (SDNP), a technical report has been prepared into housing requirements (*Technical Note: Testing the Standard Method Housing Need for East Hampshire*).
- 4.3 It is accepted that as such the Council does contain local authority boundaries that do not align with strategic making boundaries, and therefore would qualify for consideration of an alternative boundary as set out within planning practice guidance (PPG) paragraph 2a-014.
- 4.4 The technical report concludes that assessing needs of both administrative authorities separately confirms the use of a 517 dwellings per annum an appropriate modelling assumption to establish housing needs for the Council, and 115 dwellings per annum for the SDNP. This is the same figure of 632 dwellings per annum derived from the Standard Method.
- 4.5 Whilst welcoming the use of the Standard Method for the purposes of establishing housing needs, we are concerned that the Council are inferring that a lower figure is an alternative and are consulting on this basis. In line with the advice contained within PPG above, there is no evidence to suggest that exceptional circumstances exist to justify a lower figure. Furthermore, paragraph 2a-002-20190220 of the PPG confirms that the Standard Method should be treated as a minimum housing need.

### Response to Questions CLIM6: Living locally to influence the location of new homes

- 4.6 We are supportive of the principle of 'living locally' and the potential to create '20 minute neighbourhoods'. This represents a suitable mechanism for delivering highly sustainable developments.
- 4.7 More specifically, the site at Drift Road would represent an excellent opportunity to deliver a '20 minute neighbourhood', with many key facilities within walking distance, and the proximity to an excellent bus service provide links to wider facilities and services, as demonstrated within the submitted Vision document.

## **Response to Questions DEV1 and DEV 2: Distribution Strategy**

- 4.8 We would recommend priority be given to a distribution strategy that is based on a blend of Option 1 (growth distributed to more settlements, but in accordance with a revised settlement hierarchy that prioritises accessibility by walking and cycling), and Option 2 (growth concentrated in the largest settlements with more facilities and services).
- 4.9 This would best secure genuinely sustainable development that offers realistic opportunities to use alternative transport options to the private car, meet current affordable housing needs, and assist in sustaining local facilities and services. It should also enable a meaningful range of scale of sites to both deliver in the short term but be sufficiently viable to provide for some related infrastructure provision both on-site and through off-site contributions.
- 4.10 A new settlement option would not make a meaningful contribution to supply in the short-medium term, and potentially within the plan period, and therefore provision of some more modest growth adjacent to existing key settlements would still be necessary to ensure a rolling five year supply. Overall, there is an ongoing need for housing (including affordable housing) in this area, which Clanfield is capable of accommodating.
- 4.11 We also note the provision of an updated settlement hierarchy within the Settlement Hierarchy Background Paper (2022) to reflect the emphasis on accessibility on foot and by bike and enable people to live more locally in the future.
- 4.12 The revised settlement hierarchy confirms that Clanfield should be considered a 'Tier 2' settlement (equivalent to a Large Local Service Centre in the adopted Local Plan), an improvement in sustainability scoring compared to the adopted Plan designation as a Small Local Service Centre.
- 4.13 We strongly agree with this conclusion.

## **Response to Questions POP4 and POP4a : Meeting unmet housing needs**

- 4.14 The NPPF is clear in Paragraph 11 that Local Plans should "*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)*".
- 4.15 In this instance, it is relevant for the Council to consider unmet needs with the SDNP and wider PFSH region. It is acknowledged that the Council are engaging with the PFSH area. Given that Clanfield is located within PFSH sub-region, there is the potential for additional development in this settlement to contribute to these unmet needs.
- 4.16 What is evident from plan preparation across PFSH is that there are unmet needs arising in a number of areas including Portsmouth, Southampton, Gosport, and Havant. The first three authorities in this list have set out in recent consultations the shortfalls expected in the future with these totalling nearly 13,000 homes. This is a significant shortfall and whilst clearly the Council cannot be expected to meet all of these needs, it

should be looking at developing a spatial strategy that explores meeting as many of these needs as is reasonably possible whilst not unduly comprising nationally significant constraints.

- 4.17 We would also agree that the Council should continue to make provision for meeting the unmet needs of the SDNP Park within the administrative area. As a minimum this should include the 115 dwellings per annum as identified within the *Technical Note: Testing the Standard Method Housing Need for East Hampshire*.
- 4.18 The Site is located in Clanfield, within the PfSH sub-area and near to the SDNP boundary, and outside any nationally significant constraints. It represents a significant opportunity to contribute towards both the market and affordable housing needs of East Hampshire and the unmet needs of neighbouring authorities within the PfSH area.

#### **Response to Questions HOU3 and HOU4: Adaptable Housing**

- 4.19 While we do not have a specific objection to adaptable housing or a requirement for a percentage of homes to be adaptable, we consider that it would be appropriate for alternative tenures of accommodation for older people to be included on site (such as care, extra care and purpose-built accommodation for older people) in lieu of provision of adaptable housing.
- 4.20 In addition, the Site proposes to include bungalows which are well suited to the needs of older people. Therefore, the proposed development offers the potential to assist in providing adaptable housing in line with these aspirations by the Council.

#### **Response to Questions HOU5 and HOU6: Housing Mix**

- 4.21 We do not have a specific objection to the inclusion of smaller homes on development sites. However, the proposed level of smaller homes should be subject to evidence indicating that, were there is a local need for an alternative housing mix, there should be flexibility in applying the policy.
- 4.22 We note that housing mix can be subject to the location of development, with urban sites being more suited to higher density development with a higher mix of smaller dwellings, while urban extension sites are better suited to providing family housing.

#### **Response to Questions HOU7 and HOU7a: Affordable Housing**

- 4.23 We do not have a specific comment in relation to the amount of affordable housing that should be required on qualifying residential sites. However, the level of affordable housing provision should be subject to viability.
- 4.24 In terms of the Site, the proposed development would include 40% affordable housing in line with the adopted Local Plan. This is a significant planning benefit to the proposals and would meet the overall aims of the emerging Local Plan.

## 5. Summary

- 5.1 These representations have been prepared by Turley on behalf of our client Bellway Homes Ltd (Wessex) in support of development at Land South of Drift Road, Clanfield.
- 5.2 As set out, we consider it is necessary for the Council to deliver housing to meet the Standard Method housing requirement of 617 dwellings per annum as a minimum, but that in order to meet unmet needs, particularly those arising from PfSH sub-region, housing needs will be greater still.
- 5.3 Our client's Site is suitable for residential development and should be included as an allocation in the emerging Local Plan. The site location offers the opportunity to deliver a genuinely sustainable development that responds to the ambition of delivering 'walking neighbourhoods'.
- 5.4 The site is not subject to any significant constraints that would prevent development from being delivered. Whilst it is currently located with the Settlement Gap between Clanfield, Horndean and Catherington, careful consideration of landscape impacts and suitable land use disposition and vegetation planting, as set out within the Illustrative Masterplan within the Vision Document, can ensure these impacts are suitably mitigated.
- 5.5 The site can provide for significant open space and offer opportunity for bio-diversity net gain in excess of 10%. All other technical considerations can be suitably addressed to deliver a viable residential development on the site.
- 5.6 We trust that the information provided within these representations will be considered by the Council. We would welcome the opportunity to meet with officers to discuss the site further and would be grateful if you could confirm a suitable time and place to meet at your convenience.
- 5.7 Our client, Bellway Homes is a developer that is committed to early delivery of sites and this Site is highly sustainable and available to make a strong strategic contribution to future housing in East Hampshire.
- 5.8 In the meantime, please do not hesitate to contact us to discuss the site or this submission further.

## **Appendix 1: Vision Document**

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**Turley**

13 January 2022  
Delivered by email

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



Dear Sir/Madam,

## **EAST HAMPSHIRE LOCAL PLAN REG. 18: CONSULTATION RESPONSE (HARROW ESTATES)**

Thank you for the opportunity to comment on this consultation. We write on behalf of Harrow Estates, who control lands at Westlands Park, which abuts the western edge of Liphook (see Document A).

We note the Council have used the standard method as a starting point to deduce the minimum need for housing within their administrative area. This need has then been disaggregated into its constituent parts, comprising that within the district, and that within the South Downs National Park (SDNPA) parts of the district. The Council rightly then pose a question (POP3) that seeks views on whether they should seek to meet some or all the needs identified in the SDNP part of the district (i.e., 115 homes per annum).

As we elaborate further in our response to the specific questions posed, we would strongly urge the Council to explore the means to meet such needs where they arise (i.e., in the SDNP), as opposed to elsewhere in the wider district. There are emerging Neighbourhood Plans, such as the one at Bramshott & Liphook, that straddle both administrative areas, which could and should in our view be afforded the opportunity to deliver the needs for their areas. Particularly where this is focused on meeting affordable housing needs, and on supporting local employment opportunities and key services<sup>1</sup>.

National planning guidance (NPPG)<sup>2</sup> advises LPAs to ensure strategic policies in Local Plans:

*'...set out a housing requirement figure for designated neighbourhood areas from their overall housing requirement (paragraph 65 of the revised National Planning Policy Framework). Where this is not possible the local planning authority should provide an indicative figure, if requested to do so by the neighbourhood planning body, which will need to be tested at the neighbourhood plan examination. Neighbourhood plans should consider providing indicative delivery timetables, and allocating reserve sites to ensure that emerging*

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<sup>1</sup> Paragraphs 76-79 'English National Parks and the Broads - UK Government Vision and Circular 2010' (DEFRA, 2010)

<sup>2</sup> Paragraph: 009 Reference ID: 41-009-20190509

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*evidence of housing need is addressed. This can help minimise potential conflicts and ensure that policies in the neighbourhood plan are not overridden by a new local plan. (our emphasis)*

We note the broad alignment of the timetables to produce the SDNP Review Local Plan and EHDC Local Plan has shifted somewhat, as the SDNPA Local Plan review has now slipped by just over 12 months. As a result, this could delay agreement over a housing requirement figure for such Neighbourhood Plan Areas. In the interim therefore, and as outlined in the guidance above, it seems appropriate and sensible for EHDC to liaise with SDNPA and the Bramshott & Liphook Neighbourhood Plan Steering Group (BLNPSG) to discuss the benefits of setting a joint indicative requirement figure for this, and potentially other Neighbourhood Plan areas that straddle both administrative areas. Thereby providing a means to plan positively for such areas over this period.

As set out in the guidance outlined above, this would enable the BLNPSG to allocate *'reserve sites to ensure that emerging evidence of housing need is addressed. This can help minimise potential conflicts and ensure that policies in the neighbourhood plan are not overridden by a new local plan.'*

There is compelling 'emerging evidence' of a significant need for affordable housing in the BLNP area. The BLNPSG commissioned their own independent evidence on this, which was published in 2021<sup>3</sup>, which undoubtedly has social and economic implications for the area if not addressed in a timely manner.

This independent assessment indicated there was a net need for around 950 affordable homes (608 of which comprising affordable ownership) in the BLNP area, and potentially a further need for 224 homes to service the needs of older people. It is important to note that these needs were based on data derived largely from the EHDC *'Interim Housing and Economic Development Needs Assessment'* (HEDNA), published in December 2018. Since then, the median workplace-based affordability ratios used to calculate housing need for East Hampshire have worsened, from 12.59 in 2018 to 14.51 in 2021<sup>4</sup>. The affordability of housing has therefore materially worsened and may well indicate a greater need than that currently expressed in the consultant's report.

As outlined in the National Parks Circular<sup>5</sup>:

*'The Government expects the Authorities to maintain a focus on affordable housing and to work with local authorities and other agencies to ensure that the needs of local communities in the Parks are met and that affordable housing remains so in the longer term'* (our emphasis).

We would accordingly urge EHDC to liaise with SDNPA and BLNPSG to confirm an indicative housing requirement for the emerging Neighbourhood Plan, one that can meet the needs outlined in the consultant's report<sup>6</sup>, considering any updates to this since, and acknowledging the role and function Liphook plays in the wider EHDC/SDNPA area it bridges.

Our client contends there are benefits in EHDC and SDNPA jointly attributing an indicative growth requirement to this Neighbourhood Plan area, which would provide BLNPSG the grounds to test and consult on reserve site allocation options to address local needs through the emerging Neighbourhood Plan, should there be local support to do so. The reserve status of such sites enables them to be progressed in parallel with or indeed potentially in advance of both strategic tier documents, with appropriate triggers for release agreed

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<sup>3</sup> Bramshott & Liphook Housing Needs Assessment (Aecom, 2021)

<sup>4</sup> [House price to workplace-based earnings ratio - Office for National Statistics \(ons.gov.uk\)](https://ons.gov.uk) Table 5c.

<sup>5</sup> Paragraph 79 of 'English National Parks and the Broads - UK Government Vision and Circular 2010' (DEFRA, 2010)

<sup>6</sup> Bramshott & Liphook Housing Needs Assessment (Aecom, 2021)

with the local community and the lead authorities to *'minimise potential conflicts and ensure that policies in the neighbourhood plan are not overridden by a new local plan.'*<sup>7</sup>

In addition to housing need, there is also a long acknowledged local desire to address traffic congestion issues in Liphook, particularly in the Square<sup>8</sup>. The latter has been the subject of technical assessments<sup>9</sup> to better understand potential mitigation options and the cost of these to the public purse. However, such assessments do not appear to have fully assessed the potential for such works to be partially or indeed fully funded by the development of lands around Liphook.

Our client considers lands abutting the western edge of Liphook affords just such an opportunity. It occupies a suitable and highly sustainable location for growth and is of a scale capable of delivering a wide range of benefits to the area. These lands have been actively promoted by the landowners for many years as a logical and sustainable option for growth at Liphook. One that is comprehensive in nature, helps address the acute need for housing, particularly affordable housing for local people; and importantly is of a scale capable of delivering key infrastructure betterment for the settlement, its residents, businesses, and natural environment. This includes a strategic solution to the traffic congestion issues in the Square, in the form of a purpose-built relief road that is enabled and funded by this development option.

The site occupies a key strategic location within the SDNP, abutting one of the largest and most sustainable settlements in East Hampshire district, adjacent to Liphook Railway Station, Bohunt School, and a high street. It provides a unique opportunity for EHDC, SDNPA and the Bramshott & Liphook Neighbourhood Plan Steering Group (BLNPSG) to work together to address the areas needs through effective cross boundary working.

We attach a PDF copy of our client's Vision Document for this site. This comprises an early working draft of our clients emerging proposals, which will evolve with further site assessments and engagement with SDNPA, EHDC and BLNPSG amongst others. As it stands, the proposals include wide ranging benefits for the area, which include:

- The funding and delivery of a new western link road, which offers the greatest transport benefit of all options tested for Liphook and the public purse.
- The delivery of the existing consented roundabout and medical centre.
- The provision of a new car park for the railway station which is currently understood to be at capacity
- Provision of land for a new leisure facility with changing rooms, gym and swimming pool, car park and coach drop off area for Bohunt School
- Provision of land for a performing arts/theatre building adjacent to Bohunt School and Liphook Infant and Junior Schools
- Provision of land for new tennis courts and play facilities adjacent to Bohunt School
- Provision of land for nursery provision adjacent to Bohunt School
- An agreement in principle with 'Inspired Villages Group' to deliver a retirement community within the Westlands Park development, helping to meet some of the needs identified in the local area. The new Inspired Village community will include several facilities which will be made available to the general public as well as occupiers. These facilities can include a shop, restaurant / café, fitness studio and swimming pool. The offering of local facilities will be worked up further at the detailed design stage.
- An exemplar gateway to the South Downs National Park, incorporating a reception centre and car park.
- Footpaths and cycle links linking to the existing PROW network.

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<sup>7</sup> NPPG Paragraph: 009 Reference ID: 41-009-20190509

<sup>8</sup> [Liphook Sq VOLUME Traffic \(bramshottandliphookndp.uk\)](https://www.bramshottandliphookndp.uk)

<sup>9</sup> [Liphook Phase II Transport Feasibility Study Report \(Final\).pdf \(easthants.gov.uk\)](https://www.easthants.gov.uk)

- Embracing new and evolving technologies through on-site Mobility Hubs giving people access to sustainable transport options to keep up with our ever-changing world
- New foul drainage infrastructure to overcome capacity issues for Liphook.
- Full 'Suitable Alternative Natural Greenspace'(SANG) provision for the whole development
- Community allotments.
- Employment opportunities.
- The delivery of much needed housing (up to 600 homes), including affordable housing. Homes will have space for home working and are future proofed for adaptability and flexible working arrangements
- A comprehensive package of landscape and biodiversity enhancements in line with South Downs National Park standards.
- A development that complements the character of Liphook and its surrounding context, through the identification of local characteristics

We would accordingly welcome the opportunity to meet with representatives of EHDC, SDNPA and BLNPSG to discuss this exciting opportunity further.

In the interim, our client has examined the draft Local Plan and its supporting evidence base and makes the following comments to assist the Council in evolving this Plan to the next consultation stage:

**EHDC Draft Local Plan (Regulation 18 Version – November 2022)**

Paragraph/Policy	Comment
CLIM6 – Climate Emergency	Our response would comprise 'Happy', as we contend the spatial development strategy should seek to foster sustainable patterns of development. We agree, locating development to suitable locations within a short walk of local services and facilities offers significant potential to reduce the need to travel. As set out in our pre-ambule to this letter, we contend our client's site at Westlands Park, abutting the western edge of Liphook, is exemplar in this regard. We enclose a PDF copy of our client's Vision Document for this site and would encourage EHDC to liaise with SDNPA and BLNPSG to explore the benefits of assessing reserve allocation options for the emerging Neighbourhood Plan, in accordance with the approach set out in NPPG <sup>10</sup> . We would welcome the opportunity to meet with representatives of EHDC, SDNPA and BLNPSG to discuss this exciting opportunity further, and to agree the approach open to BLNPSG to assess and consult on this option through the Neighbourhood Plan following effective cross boundary working.
POP1 – Population and Housing	As set out in the Council's <i>'Technical Note: Testing the Standard Method Housing Need for East Hampshire'</i> (Iceni, 2022) there is little evidence to suggest the Standard Method output is overestimating housing needs across the district, indeed, at section f., the note confirms there is every reason to suspect the output underestimates needs.

<sup>10</sup> Paragraph: 009 Reference ID: 41-009-20190509

	<p>We concur and support therefore the use of the standard method as a minimum starting point, as envisaged in NPPG<sup>11</sup>. In addition, and as rightly noted at paragraph 4.10 of the Councils <i>'Housing needs and requirement Background paper' (EHDC, 2022)</i>, NPPG advises the Council to explore whether there are grounds for an upward adjustment to this baseline minimum. This includes amongst other things, adjustment to address affordable housing shortages or assist adjoining LPAs with unmet needs. Turning to the first of these, NPPG suggests <i>'An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes.'</i><sup>12</sup></p> <p>Paragraph 4.15 of the Councils <i>'Housing needs and requirement Background paper' (EHDC, 2022)</i> confirms there is a total need for 613 affordable homes per annum, which equates to approximately 97% of the standard method figure. Whilst we agree that it may prove to be unrealistic to meet all such needs within the plan period, we do not agree there is no justification for an uplift at all. This would not satisfy the 'positively prepared' test of soundness at paragraph 35 of NPPF in our view. This should be explored further in combination with a whole plan viability assessment. As outlined in our pre-amble, we would recommend EHDC, in liaison with SDNPA, liaise with Neighbourhood Plan Groups to explore the benefits of setting indicative housing requirements, and testing reserve site options, to address such needs, as set out in NPPG Paragraph: 009 Reference ID: 41-009-20190509.</p> <p>As set out in the National Park Circular<sup>13</sup>:</p> <p><i>'The Government expects the Authorities to maintain a focus on affordable housing and to work with local authorities and other agencies to ensure that the needs of local communities in the Parks are met and that affordable housing remains so in the longer term.'</i> (our emphasis)</p> <p>Turning to unmet housing need. We note from the Councils <i>'Duty to Cooperate Framework' (EHDC, 2022)</i>, that there have been several formal requests of assistance from adjoining authorities beyond just co-operating with the SDNPA. This includes Chichester and Havant. In addition, we note at page 14-15 of this document, the Council acknowledge the draft PFSH Statement of Common Ground (SoCG) published in 2021. This identified unmet housing needs across this group of adjoining authorities of around 13,000 homes. However, it is important to note this was revised upwards in December 2022, to 20,000 homes, in the</p>
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<sup>11</sup> Paragraph: 002 Reference ID: 2a-002-20190220

<sup>12</sup> NPPG Paragraph: 024 Reference ID: 2a-024-20190220

<sup>13</sup> Paragraph 79 of 'English National Parks and the Broads - UK Government Vision and Circular 2010' (DEFRA, 2010)

	<p>latest draft of this SoCG<sup>14</sup>. It is noted at paragraph 4.20 of the Councils 'Duty to Cooperate Framework' (EHDC, 2022) that the Council acknowledge the need to continue to assess, through the SA process, the contribution EHDC may be able to make to help address unmet needs from adjoining authorities. We therefore reserve the right to comment further on this once the outcome of such assessment work is complete, and EHDC's position is clearer.</p>
<p>POP2 – Population and Housing</p>	<p>In short, yes. There are strong reasons why the minimum housing need deduced through the standard method should not comprise the housing requirement for the Local Plan.</p> <p>NPPG<sup>15</sup> confirms the standard method output:</p> <p><i>'...does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates.</i></p> <p><i>This will need to be assessed prior to, and separate from, considering how much of the overall need can be accommodated (and then translated into a housing requirement figure for the strategic policies in the plan).'</i> (our emphasis)</p> <p>We contend there are strong grounds to suggest a need for an upward adjustment to the LHN figure. This has not been appropriately assessed or positively planned for at present in our opinion.</p> <p>For brevity our suggested grounds for an upward adjustment to the baseline minimum requirements are outlined in our response to question POP1.</p>
<p>POP3 – Population and Housing</p>	<p>In response to this question, we would strongly urge the Council to explore the means to meet 'ALL' the minimum needs identified in the SDNP parts of the district where they arise (i.e., in the SDNP), as opposed to elsewhere in the wider district. There are emerging Neighbourhood Plans, such as the one at Bramshott &amp; Liphook, that straddle both administrative areas, which could and should in our view be afforded the opportunity to deliver the needs for their areas. Particularly where this is focused on meeting affordable housing needs, and on supporting local employment opportunities and key services<sup>16</sup>.</p>

<sup>14</sup> Paragraph 3.46 of SoCG - [\(Public Pack\)Agenda Document for Partnership for South Hampshire \(PFSH\) Joint Committee, 07/12/2022 18:00 \(push.gov.uk\)](#)

<sup>15</sup> PPG Reference ID: 2a-010-20201216

<sup>16</sup> Paragraphs 76-79 'English National Parks and the Broads - UK Government Vision and Circular 2010' (DEFRA, 2010)

	<p>National planning guidance (NPPG)<sup>17</sup> advises LPAs to ensure strategic policies in Local Plans:</p> <p><i>‘...set out a housing requirement figure for designated neighbourhood areas from their overall housing requirement (paragraph 65 of the revised National Planning Policy Framework). Where this is not possible the local planning authority should provide an indicative figure, if requested to do so by the neighbourhood planning body, which will need to be tested at the neighbourhood plan examination. Neighbourhood plans should consider providing indicative delivery timetables, and allocating reserve sites to ensure that emerging evidence of housing need is addressed. This can help minimise potential conflicts and ensure that policies in the neighbourhood plan are not overridden by a new local plan. (our emphasis)</i></p> <p>We note the broad alignment of the timetables to produce the SDNP Review Local Plan and EHDC Local Plan has shifted somewhat, as the SDNPA Local Plan review has now slipped by just over 12 months. As a result, this could delay agreement over a housing requirement figure for such Neighbourhood Plan Areas. In the interim therefore, and as outlined in the guidance above, it seems appropriate and sensible for EHDC to liaise with SDNPA and the Bramshott &amp; Liphook Neighbourhood Plan Steering Group to discuss the benefits of setting a joint indicative requirement figure for this, and potentially other, Neighbourhood Plan areas that straddle both administrative areas. A means to plan positively for such areas over this period.</p> <p>As set out in the guidance outlined above, this would enable the BLNPSG to allocate <i>‘reserve sites to ensure that emerging evidence of housing need is addressed. This can help minimise potential conflicts and ensure that policies in the neighbourhood plan are not overridden by a new local plan.’</i></p> <p>There is compelling ‘emerging evidence’ of a significant need for affordable housing in the BLNP area. The BLNPSG commissioned their own independent evidence on this, which was published in 2021<sup>18</sup>, which undoubtedly has social and economic implications for the area if not addressed in a timely manner.</p> <p>This independent assessment indicated there was a net need for around 950 affordable homes (608 of which comprising affordable ownership) in the BLNP area, and potentially a further need for 224 homes to service the needs of older people. It is important to note that these needs were based on data derived largely from the EHDC <i>‘Interim Housing and Economic Development Needs Assessment’</i> (HEDNA), published in</p>
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<sup>17</sup> Paragraph: 009 Reference ID: 41-009-20190509

<sup>18</sup> Bramshott & Liphook Housing Needs Assessment (Aecom, 2021)

	<p>December 2018. Since then, the median workplace-based affordability ratios used to calculate housing need for East Hampshire have worsened, from 12.59 in 2018 to 14.51 in 2021<sup>19</sup>. The affordability of housing has therefore materially worsened and may well indicate a greater need than that currently expressed in the consultants' independent report.</p> <p>As outlined in the National Parks Circular<sup>20</sup>:</p> <p><i>'The Government expects the Authorities to maintain <u>a focus on affordable housing and to work with local authorities and other agencies to ensure that the needs of local communities in the Parks are met</u> and that affordable housing remains so in the longer term'</i> (our emphasis).</p> <p>We would accordingly urge EHDC to liaise with SDNPA and BLNPSG to confirm an indicative housing requirement for the emerging Neighbourhood Plan, one that can meet the needs outlined in the consultant's report, considering any updates to this since, and acknowledging the role and function Liphook plays in the wider EHDC/SDNPA area it bridges.</p> <p>Our client contends there are benefits in EHDC and SDNPA jointly attributing an indicative growth requirement to this Neighbourhood Plan area, which would afford the BLNPSG the opportunity to test and consult on reserve site allocation options to address local needs through the emerging Neighbourhood Plan, should there be local support to do so. The reserve status of such sites enables them to be progressed in parallel with or indeed potentially in advance of the strategic tier documents, with appropriate triggers for release agreed with the local community and the lead authorities to <i>'minimise potential conflicts and ensure that policies in the neighbourhood plan are not overridden by a new local plan.'</i><sup>21</sup></p> <p>Our client considers lands abutting the western edge of Liphook affords just such an opportunity. It occupies a suitable and highly sustainable location for growth and is of a scale capable of delivering a wide range of benefits to the area. These lands have been actively promoted by the landowners for many years as a logical and sustainable option for growth at Liphook. One that is comprehensive in nature, helps address the acute need for housing, particularly affordable housing for local people; and importantly is of a scale capable of delivering key infrastructure betterment for the settlement, its residents, businesses, and natural environment.</p>
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<sup>19</sup> [House price to workplace-based earnings ratio - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk) Table 5c.

<sup>20</sup> Paragraph 79 of 'English National Parks and the Broads - UK Government Vision and Circular 2010' (DEFRA, 2010)

<sup>21</sup> NPPG Paragraph: 009 Reference ID: 41-009-20190509

	<p>The site occupies a key strategic location within the SDNP, abutting one of the largest and most sustainable settlements in East Hampshire district, adjacent to Liphook Railway Station, Bohunt School, and a high street. It provides a unique opportunity for EHDC, SDNPA and the Bramshott &amp; Liphook Neighbourhood Plan Steering Group (BLNPSG) to work together to address the areas needs through effective cross boundary working.</p> <p>We attach a PDF copy of our client’s Vision Document for this site. This comprises an early working draft of our clients emerging proposals, which will evolve with further site assessments and engagement with SDNPA, EHDC and BLNPSG amongst others. We would accordingly welcome the opportunity to meet with representatives of EHDC, SDNPA and BLNPSG to discuss this exciting opportunity further.</p>
<p>POP4 – Population and Housing</p>	<p>We would suggest EHDC offer to assist with some unmet needs, particularly where there is a direct relationship with communities of East Hampshire. An example being at Liphook, where the Neighbourhood Plan area encompasses both EHDC and SDNP administrative areas. The needs of this area should be assessed, having regard to the scale of unmet needs in the adjoining SDNP, to deduce the contribution that can meaningfully be addressed through the emerging Neighbourhood Plan.</p> <p>Our client considers lands abutting the western edge of Liphook affords just such an opportunity. It occupies a suitable and highly sustainable location for growth and is of a scale capable of delivering a wide range of benefits to the area.</p> <p>The site occupies a key strategic location within the SDNP, abutting one of the largest and most sustainable settlements in East Hampshire district, adjacent to Liphook Railway Station, Bohunt School, and a high street. It provides a notable opportunity for EHDC, SDNPA and the Bramshott &amp; Liphook Neighbourhood Plan Steering Group (BLNPSG) to work together to address the areas needs through effective cross boundary working.</p> <p>We attach a PDF copy of our client’s Vision Document for this site. This comprises an early working draft of our clients emerging proposals, which will evolve with further site assessments and engagement with SDNPA, EHDC and BLNPSG amongst others. We would accordingly welcome the opportunity to meet with representatives of EHDC, SDNPA and BLNPSG to discuss this exciting opportunity further.</p>

<p>INF3 - Infrastructure</p>	<p>We consider ‘Large Sites’ have the greatest potential to deliver meaningful infrastructure gains to local communities, thereby reducing the burden on the public purse.</p> <p>An example being at Liphook, where there is a long acknowledged local desire to address traffic congestion issues in Liphook, particularly in the Square<sup>22</sup>. The latter has been the subject of technical assessments<sup>23</sup> to better understand the potential mitigation options and the cost of these to the public purse. However, such assessments do not appear to have fully assessed the potential for such works to be partially or indeed fully funded by growth that would address some of the areas need for housing, particularly affordable housing, amongst other uses considered beneficial for the area to thrive.</p> <p>Our client contends there are benefits in EHDC and SDNPA jointly attributing an indicative growth requirement to this Neighbourhood Plan area, which affords the BLNPSG the opportunity to test and consult on reserve site allocation options to address local needs through the emerging Neighbourhood Plan, should there be local support to do so. The reserve status of such sites enables them to be progressed in parallel with or indeed potentially in advance of the strategic tier documents, with appropriate triggers for release agreed with the local community and the lead authorities to <i>‘minimise potential conflicts and ensure that policies in the neighbourhood plan are not overridden by a new local plan.’</i><sup>24</sup></p> <p>Our client considers lands abutting the western edge of Liphook affords just such an opportunity. It occupies a suitable and highly sustainable location for growth and is of a scale capable of delivering a wide range of benefits to the area. These lands have been actively promoted by the landowners for many years as a logical and sustainable option for growth at Liphook. One that is comprehensive in nature, helps address the acute need for housing, particularly affordable housing for local people; and importantly is of a scale capable of delivering key infrastructure betterment for the settlement, its residents, businesses, and natural environment.</p> <p>The site occupies a key strategic location within the SDNP, abutting one of the largest and most sustainable settlements in East Hampshire district, adjacent to Liphook Railway Station, Bohunt School, and a high street. It provides a unique opportunity for EHDC, SDNPA and the Bramshott &amp; Liphook Neighbourhood Plan Steering Group (BLNPSG) to work together</p>
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<sup>22</sup> [Liphook Sq VOLUME Traffic \(bramshottandliphookndp.uk\)](https://www.bramshottandliphookndp.uk)

<sup>23</sup> [Liphook Phase II Transport Feasibility Study Report \(Final\).pdf \(easthants.gov.uk\)](https://www.easthants.gov.uk)

<sup>24</sup> NPPG Paragraph: 009 Reference ID: 41-009-20190509

	<p>to address the areas needs through effective cross boundary working.</p> <p>We attach a PDF copy of our client’s Vision Document for this site. This comprises an early working draft of our clients emerging proposals, which will evolve with further site assessments and engagement with SDNPA, EHDC and BLNPSG amongst others. We would accordingly welcome the opportunity to meet with representatives of EHDC, SDNPA and BLNPSG to discuss this exciting opportunity further.</p>
<p>DEV1 &amp; Dev 2 – Development Strategy</p>	<p>Whilst we would rank these options in order of preference as 2, 1, 3 and 4, there is a need in our view to consider a hybrid option between option 1 and 2. We agree, to accord with government guidance in NPPF growth should be distributed to foster more sustainable development patterns. The growth directed to each settlement should therefore ensure this contributes to this objective and does not lead to an increased need to travel.</p> <p>However, as the Council highlight, unlike Option 1, Option 2 offers, <i>‘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.’</i> Option 1 on its own may conversely in our view direct too much growth to more remote settlements, which may lead to an increased need to travel.</p> <p>Liphook for example is shown as a Tier One settlement under Option 1, which we wholly support, but under Option 2 is downgraded to a Tier 2 settlement. It is not clear how or why this would be the case, as this is unlikely in our view to be justified or effective in fostering more sustainable development patterns.</p> <p>A hybrid option should therefore be considered between options 1 and 2, one that directs growth to the largest and most sustainable settlements, but has a focus on growth options that afford the greatest opportunities to access local facilities and services by foot or cycle.</p> <p>Our client considers lands abutting the western edge of Liphook affords just such an opportunity. It occupies a suitable and highly sustainable location for growth and is of a scale capable of delivering a wide range of benefits to the area.</p> <p>The site occupies a key strategic location within the SDNP, abutting one of the largest and most sustainable settlements in East Hampshire district, adjacent to Liphook Railway Station, Bohunt School, and a high street. It provides a unique opportunity for EHDC, SDNPA and the Bramshott &amp; Liphook Neighbourhood Plan Steering Group (BLNPSG) to work together</p>

	<p>to address the areas needs through effective cross boundary working.</p> <p>We attach a PDF copy of our client’s Vision Document for this site. This comprises an early working draft of our clients emerging proposals, which will evolve with further site assessments and engagement with SDNPA, EHDC and BLNPSG amongst others. We would accordingly welcome the opportunity to meet with representatives of EHDC, SDNPA and BLNPSG to discuss this exciting opportunity further.</p>
DEV 3 – Development Strategy	Yes. See response to DEV 2 above.

We trust the enclosed comments are useful. Our client would welcome the opportunity to meet representatives of EHDC, SDNPA and BLNPSG to discuss these matters further, in advance of the next consultation stages of this Local Plan.

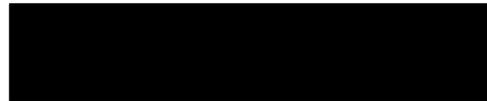
Yours sincerely



Enc - Document A (Vision Document - Turley, 2022)



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



16<sup>th</sup> January 2023

Dear Sir/Madam,

**East Hampshire Local Plan Review 2021-2040  
Issues and Priorities Regulation 18 Part 1**

I write on behalf of my client Belport Limited in response to East Hampshire Local Plan Review Issues and Priorities Regulation 18 Part 1 consultation. The following comments have also been submitted via the Commonplace platform.

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

Happy.

Belport are supportive of the draft Local Plan Vision. Belport's approach to development reflects the values and aspirations encapsulated in the draft Local Plan Vision. Specifically, Belport seek to create healthy, accessible and inclusive neighbourhoods comprising quality homes within a framework of green, open space. Places to live, work and play.

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

Yes.

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

No. The Vision needs to provide an overarching, aspirational approach to the development of District as a whole.

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

Climate Emergency (3)

Environment (2)

Population and Housing (1)

Types of Housing Needs (5)

Infrastructure (4)

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

Belport recognise the critical importance of acting to address climate change and the climate emergency.

Belport are committed to seeking to achieve the highest sustainability and environmental standards through their developments.

It is noted that the traditionalist approach to urban design and architecture that Belport seek to deliver, is entirely compatible with achieving high environmental and sustainability standards.

However, to ensure that the emerging Local Plan is robust and defensible at Examination, it is important to explore if sustainability standards can be viably achieved across all new residential development in the district. Specifically, requiring net zero on all new housing, including affordable housing could undermine viability. This could cast into doubt the deliverability and soundness of the plan.

It is suggested that the draft Plan could instead take a more flexible approach to enhancing sustainability standards, perhaps encouraging rather than requiring. It is noted that building regulations will continue to be enhanced over the plan period in any event, which will on its own help secure the step change that is needed.

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

That the construction of new buildings should use less fossil fuels and more recycling of materials (2)

That all new buildings should be zero carbon (5)

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 (1)

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 (3)

That trees and other green infrastructure could play an important role in reducing flood risks (4)

**CLIM 3 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?**

We suggest that the Plan should be aligned with Building Regulation. The introduction of policies and requirements that differ from Building Regulations could cause confusion which has the potential lead to delay in the planning and development process, undermining housing delivery.

The Plan should however include policies which include positive encouragement to go further than Building Regulations. This could be considered as part of the assessment of planning applications.

**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?**

We suggest that the Plan should be aligned with Building Regulation. The introduction of policies and requirements that differ from Building Regulations could cause confusion which has the potential lead to delay in the planning and development process, undermining housing delivery.

The Plan should however include policies which include positive encouragement to go further than Building Regulations. This could be considered as part of the assessment of planning applications.

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

In the emerging East Hampshire Local Plan (No)

In future neighbourhood plans (No)

In local design codes (No)

**CLIM5a Please explain your answer**

We suggest that planning policy (be that in the local plan, neighbourhood plan or design codes) should be aligned with Building Regulation and other technical regimes such as national flood risk policy. These are updated as required and as appropriate. The introduction of policies and requirements that differ from Building Regulations could cause confusion and lead to delay in the planning and development process.

Planning policy should however include policies which include positive encouragement to go further than Building Regulations. This could be taken into account as part of the assessment of planning applications.

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

Happy

**CLIM6a Please explain your response.**

Belport fully recognise the importance of new homes being located in location which allow for 'living locally': "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).

Our ambition is to identify sustainable locations, suitable for the creation of walkable neighbourhoods.

Belport note that Holybourne is a sustainable location for development. There are two mainstream schools in the settlement: Andrew Endowed School (Primary) and Eggar's School (Secondary). There is also a specialist school, Treloar School. The settlement has two pubs, a shop and regular bus services along London Road.

Holybourne is also close to the town of Alton. Alton railway station is a 20-minute walk away, offering departures every 30 minutes to London Waterloo Station (the station can also be accessed in seven minutes via the existing 206 bus route from Bonhams Close or five minutes by car). Within Alton town centre (a 30-minute walk, a nine-minute bus journey using the 206 service or a five-minute car journey from the site), there are a number of good services and facilities including schools (primary, secondary and college), GPs, a large business park, gyms, supermarkets, restaurants and shops. The site is also near the A31 which offers strategic transport links to the M3.

**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**

Belport consider that the Council was correct to explore whether exceptional circumstances existing to justify a revised local housing requirement. Going forward, Belport recommend that the outcome of that objective, evidence-based process (that exceptional circumstance do not exist) should be accepted.

To explore this issue further could lead to a substantive delay the Local Plan process, leaving the Council without an up-to-date Local Plan. As you will be fully aware, the absence of an up-to-date Local Plan leaves the Council exposed to speculative, unplanned housing development which the Council is unable to properly control.

Belport thereby suggest that, in the interests of proper, strategic planning (and all of the benefits that this delivers for the communities of East Hampshire) the Council should accept the standard method housing requirement and progress the new Local Plan accordingly.

It is noted that whilst the current consultation on the revised National Planning Policy Framework (NPPF) states that the standard method is an “*advisory starting-point for establishing a housing requirement for the area*”, an alternative approach to assessing housing needs still requires “*exceptional circumstances*”. It is also noted the draft revised NPPF does not alter the need to have an up-to-date local plan. In all practical terms the draft revised NPPF continues to require the Council to accept the standard method in the preparation of the new 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? (Y)**

**POP2a Please explain your answer.**

Belport suggest that, as a minimum, the figure should be increased to 532 dwellings per annum to include the unmet need of from SDNPA (15 dwellings per annum). Whilst this is only a small increase, it is important that the Council is clear about this now as it demonstrates compliance with the Duty-to-cooperate.

Before the housing requirement is fixed it is also recommended that the Council continue to explore if any other neighbouring authorities have unmet needs which they are unable to accommodate.

It is noted that this can be a difficult and prolonged discussion to agree unmet needs in neighbouring authorities. In the absence of robust understanding of unmet needs the Council could explore if a notional higher housing requirement can be accommodated in the district. Other authorities have assessed an additional 20% (which comprise an additional 106 dwellings, taking the requirement to 638 dwelling), so this could be a reasonable starting point. This high requirement could be included as a reasonable alternative in the Sustainability Appraisal.

**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.**

The current agreement with SDNPA, that they deliver 100 homes a year, should be continued. The balance of 15 dwellings a year should be added to housing requirement for the EHPA.

**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.**

Belport note that the options that have been identified in question POP4 may not be entirely consistent with the Council's statutory obligations in respect of the Duty-to-Cooperate.

To be compliant with the Duty, the Council should continue to engage 'on an ongoing basis' with neighbouring authorities to understand the scale of any unmet need. Once that need has been identified the Council should then assess the capacity of the district to accommodate some or all of that need.

As such the Council should not take a policy decision at this early stage in the plan making process as to whether or not to accommodate unmet needs from neighbouring authorities. That decision should be based upon evidence as to whether there is capacity to accommodate unmet need.

It is acknowledged that the absence of a full understanding of the scale of potential unmet needs from neighbouring authorities make progressing the plan difficult. To ensure that the progress of the Plan is not delayed pending a better understanding of unmet needs from neighbouring authorities, it is recommended that the Council explore if a notional higher housing requirement can be accommodated in the district. It is suggested that an additional 20% (which comprise an additional 106 dwellings, taking the requirement to 638 dwelling) would be a reasonable starting point. This high requirement should be included as a reasonable alternative in the Sustainability Appraisal.

**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.**

To ensure the plan is sound the need should be identified, and specific sites allocated to accommodate. This will ensure deliverability.

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

No.

**HOU3 Should the Local Plan include a specific policy on adaptable housing? (Y)**

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

**HOU4a Please explain your answer.**

Whilst it appears there is a need for some adaptable homes it is suggested that further evidence is provided to justify a percentage approach.

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

In respect of market housing, it is suggested that a blanket district wide mix policy, set now and applied over the entire plan period, may not be the most effective way of responding to demand and need.

It is suggested that a site-by-site approach could be more appropriate. This is because the most appropriate mix for a site will be very much dependent upon the location; the developer will be best placed to understand the demand and the needs in that area. Also, the characteristic of a particular site will drive the appropriate mix, ensuring the efficient and effective use of land.

It is thereby suggested that developers in discussion with the Council determine the most appropriate mix on a site-by-site basis.

**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.**

Belport acknowledges the need for affordable housing within the district, and consider that complying with the extant 40% requirement is achievable alongside delivering other planning objectives such as high quality urbanism.

Whilst it is noted that the extant 40% requirement is unlikely to provide sufficient affordable housing over the plan period to meet all the need in the district, there is a risk that an increase above that level could present challenges.

Reducing the viability of the development threatens the ability of schemes to achieve other planning objectives such achieving high quality of urbanism, high levels of sustainability or the delivery of infrastructure.

It is important that the need for affordable housing is balanced against other planning objectives including the achievement of high levels of sustainability and the delivery of infrastructure.

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

Self and Custom Build Housing.

**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; (3)**
- **Protecting the most vulnerable existing protected habitats and species; (1)**
- **Conserving the character of rural landscapes; (4)**
- **Creating better natural links between existing habitats (2)**

**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**

The 'best outcome of infrastructure provision' is dependent upon many complex factors, not just site size. Alongside site size a critical issue is the location of the site, particularly with regard to the availability of existing services and infrastructure. Each site needs to be assessed and understood with regard to particular infrastructure conditions in the location.

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

Option 1: Disperse new development to a wider range of settlements (2)

Option 2: Concentrate new development in the largest settlements (1)

Option 3: Distribute new development by population (3)

Option 4: Concentrate development in a new settlement (4)

**DEV2 Why have you ranked the options in this way? (Please give reasons for your chosen ranking)**

As a general principle Belport consider that growth should be directed towards settlements and location with a good range of services and facilities and with good access to higher order services and facilities. We consider that is best reflected in Option 2.

By way of illustration Holybourne has a good range of services and facilities within the settlement and has good access to the higher order services and facilities in Alton (including regional public transport connectivity). Thereby Holybourne is demonstrably a suitable location for

accommodating growth. It is thereby noted that Holybourne is identified in both Option 1 and Option 2.

The scale of that growth in suitable location should be determined with reference to settlement specific constraint and opportunities as well as site specific considerations and development proposals which successfully address these considerations.

**GEN1 How do you feel about this consultation?**

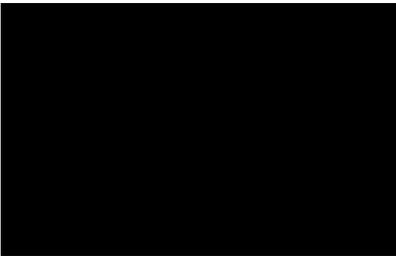
Happy

**GEN2 Is there anything else you would like to tell us in response to this consultation? (please explain).**

It is encouraging that this consultation has sought to look afresh at the challenges facing the District and has sought to proactively acknowledge these and explore how they can be addressed.

I trust these comments are helpful.

Yours Faithfully



Ref:  
Date: January 2023

Vail Williams LLP  
Lakeside North Harbour  
Western Road  
Portsmouth  
PO6 3EN

Sent via email to: [localplan@easthants.gov.uk](mailto:localplan@easthants.gov.uk)

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

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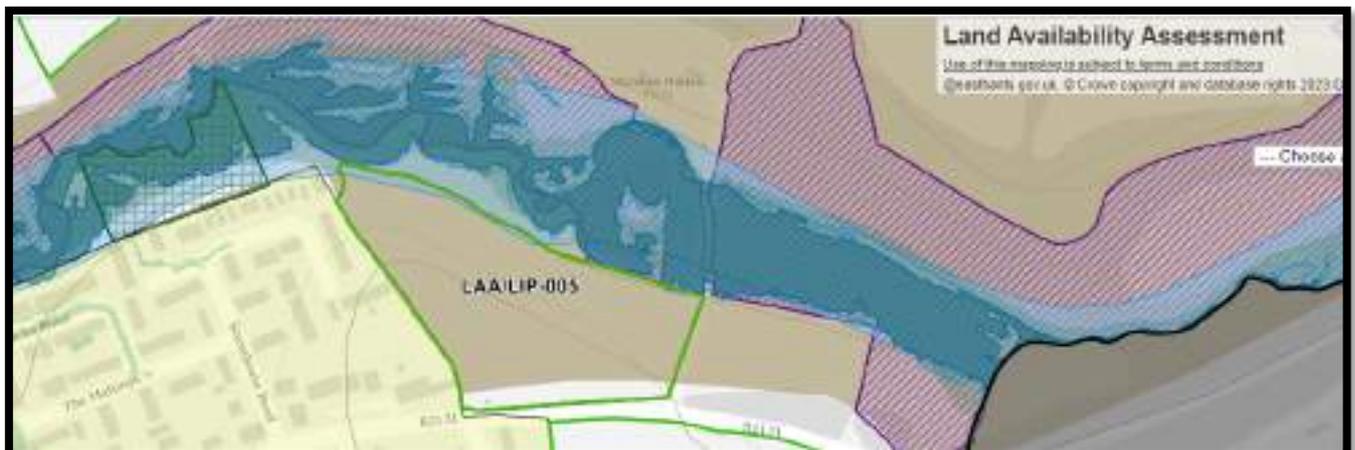
Dear Sir/Madam

**Re: East Hampshire District Council's – Issues and Priorities  
Local Plan 2021 – 2040 Regulation 18 Consultation Response**

Vail Williams LLP has been instructed to submit representations on behalf of Elberry Properties Ltd in relation to the East Hampshire District Council's Regulation 18, Part 1 Consultation.

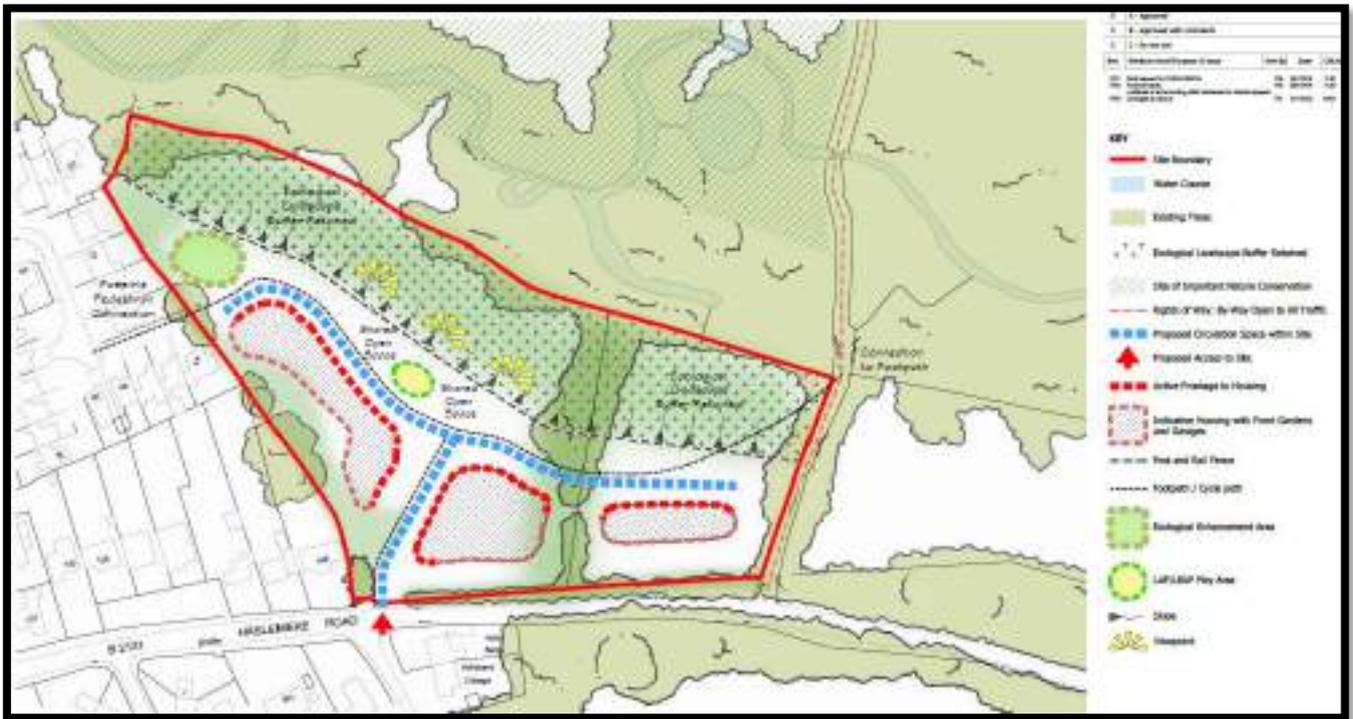
Elberry Properties Ltd is the promoter of a SHLAA site reference LIP034 which is also known in the Land Availability Assessment as LIP-005. The site is located on land north of Haslemere Road, Liphook, GU30 7BX. The site is located contiguous with Liphook's settlement boundary. In addition to the previous promotion of the site through the SHLAA process, Elberry Properties Ltd is also engaging locally through representation to Bramshott & Liphook Neighbourhood Development Plan Steering Group.

The site is identified below on the Council's Land Availability Assessment under ref: LAA/LIP-005.



The site is subject to surveys and assessments by architects, planning consultants, transport consultants etc. regarding the site being brought forward for development. An indicative site layout is overleaf regarding the way in which it is proposed to address the site's context, the needs of the area and the Council's Vision, Issue and Priority aims and objectives.

The site subject to these representations is illustrated below with an indicative plan which illustrates the proposed layout regarding the site's context, constraints, and way in which the shared spaces and movement will occur. The plan also indicates the location of the housing which has been context led.



These representations focus primarily on the Council's Issues and Priorities of the Local Plan, and also to set out at (the end of these representations) how the proposed site for housing specifically meets the Council's Vision, Issue and Priorities on a site specific basis and as such demonstrating why the site should be included in the Local Plan when the Planning Policy team seek to identify sites at the detailed assessment stages in the Plan making process.

These representations also provide full and comprehensive responses to the options set out in the public consultation.

### Issues and Priorities Regulation 18 – Part 1

It is noted that the LPA have the following **strategies**:

- Climate and Environment Strategy 2020-2025 (including net zero by 2050 and protection, improvement and enhancement of the natural environment)
- Welfare and Wellbeing strategy 2020-2024 (including "improving community connectivity and sense of place")
- Enhancing East Hampshire Place Making Strategy 2019 – 2036 (including "Strengthening identity and sense of place; improving public realm; and, improving connectivity through walking, cycling and wayfinding routes")

## **EHDC's Vision**

Elberry Properties Ltd note that the Council's Vision should be 'ambitious' and 'achievable' commentary will be provided broadly on the basis of the achievable requirement from a development perspective.

It is noted that the Council's Vision is derived from the evidence from previous consultations on the Local Plan which have resulted in the following aims and objectives:

- 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.

Elberry Properties Ltd supports these aims and objectives particularly the aims of healthy, accessible and inclusive communities, where quality homes provide green and welcoming places to live, work and play responding positively to climate change.

## **Vision consultation questions:**

**VIS1 (How do you feel about the Vision)** - Elberry Properties Ltd are happy with the Vision.

**VIS2 (Does the Vision cover key matters of importance)** – Yes

**VIS3 (Should the Vision be more area specific)**– No need to be. **VIS3a** The Vision is broad and considered achievable across the District as a whole. Geographical and/or area-based aims, objective, policies and priorities can be derived from a broad Vision, as such it is considered that the Vision is not required to be area specific.

## **Issues and Priorities**

### **Overview**

#### **OV1 (Please order the 5 key issues and priorities)**

Elberry Properties Ltd would rank the five key issues and priorities in the following priority order:

- First – Population and Housing.
- Second – Environment.
- Third – Climate.
- Fourth – Infrastructure.
- Fifth - Types of Housing.

#### **Issue: The Climate Emergency**

**CLIM1 (greenhouse gas emissions)** - Elberry Properties Ltd on the question of: avoiding increases of greenhouse gas emissions, where 'practicable' is understood and agreeable. It is noted that Building Regulations are predominantly the driving force for energy and carbon efficiency on buildings including moving away from fossil fuels.

It is therefore considered that the planning authority would be better placed focussing on sustainable locations of development as their focus with a view to reducing the need to travel by private vehicles, rather than doubling up planning policy with targets set out in building standards regulations.

**CLIM2 (broad climate solutions set out for prioritising)**– Rather than rank the matters of importance listed, Elberry Properties Ltd would like to comment on the options. It is considered that the first option, in respect of fossil fuels will be irrelevant before the Local Plan is adopted, as expected in 2026, because the Future Homes and Buildings Standards will come into force in 2025, which will bring a complete cessation to new homes with fossil fuels, prior to adoption of the local plan. As such this should not be a priority for the Local Plan as it would duplicate standards which will be delivered through building control/standards.

The second option (that all new buildings should be zero carbon) is also covered by the Future Homes and Buildings Standard in 2025.

The third option is not considered ‘achievable’. There should be no fixed requirement for renewable energy to apply to all development, the aims should be to take into consideration the positive contribution which renewable energy provision provides to helping to meet aim regarding the climate rather than a mandatory requirement.

The fourth option of water availability and consumption on site, on a site-by-site basis, should set flexible targets which would be considered as favourable as material considerations if on site provisions are made, however, with the ‘achievable’ point in mind targets and policies need to be realistic and encourage schemes to reduce water use and promote reuse of greywater, rather than mandatory requirements.

Furthermore, it is considered that requirements for water availability should be managed by the statutory utility providers/undertakers regarding reservoirs as a higher priority. New developments cannot collect fresh water, only grey water. A far better and future proof way of managing water use would be to look to work with the EA with regard to educating and working with landowners with riparian rights with regard to water use and with the water authority (southern Water) with regard to identifying (if required) where reservoir provision may be needed, as a prevention/‘macro’ approach to problem solving water shortages rather than looking to new (not existing) developments for a cure at a ‘micro’ level.

The fifth option of green infrastructure playing a role in reducing flood risk, is considered by Future Homes and Buildings Standard in 2025 to be a sound and practical aim and objective.

CLIM2 in summary: Option 1 and 2 should be removed as superfluous. Options 3 and 5 where practical and proposed in developments should carry weight in planning terms, but not be mandatory. Option 4 should focus primarily as an infrastructure matter.

**CLIM3 (Do you agree with EHDC’s own definition of net zero development)** – No. The first part of the definition sets out a consideration to include the consumption of energy at individual properties. This part of the definition is perhaps going too far beyond the scope of a public authority, regarding Article 8 of the Human Rights Act which protects rights to respect for your private and family life.

The second part of the definition should focus on the Local Plan supporting large scale renewable energy schemes to come forward independently from other developments; to meet the needs of existing and proposed development in the district. Proposed developments which include renewables should be given appropriate weight in support, although not a mandatory requirement to deliver for all on site needs, nor should off site provision be tied to any specific development; nor hinder bringing new sites forward. Instead focus should be on provision at an infrastructure level with energy schemes delivering renewable energy for existing, as well as proposed needs.

**CLIM4(a) (should the Local Plan focus on the described energy hierarchy) – No.** As above it is considered that Building Regulations already cover energy efficiency matters and the Future Homes and Buildings Standard in 2025 will be in place ahead of the EHDCs emerging Local Plan.

**CLIM5(a) (should the detailed criteria for talking climate change be included in the EHDCLP, Neighbourhood Plans and Design Codes) – No** to all. This is on the basis that building regulations covers the matters and duplication in the Local Plan, Neighbourhood Plans and Design Codes will become dated and either set targets which are not achievable or targets which loose pace with Building Control regulations. As such its superfluous and unable to keep pace with regulatory changes.

**CLIM6(a) (How do you feel about the definition of “living locally” i.e. the 20 minute neighbourhood)** Elberry Properties Ltd is “Very Happy” with the aim of “living locally” to influence the location of new homes. Living locally is considered to include the site promoted through these representations (LIP-005).

#### **Issue: Population and Housing**

**POP1(a) (Should the Council use the Housing Delivery Test or explore whether exception circumstances exist) -** Elberry Properties Ltd considers that the Council should use the standard method of calculating housing numbers. The current trend of LPAs seeking exceptional circumstances creates an unacceptable level of uncertainty to the general public and the developers with respect to the local economy and economic drivers. Elberry Properties Ltd is unaware of any LPA having succeeded in their delaying the local plan process for this purpose. It is considered inappropriate and unwise to delay the local plan process as the decision in December 2022 regarding the Levelling-Up and Regeneration Bill was to progress without changing the rule book on the standard calculations. This results in a multitude of speculative applications seeking to demonstrate ‘sustainable development’ and ultimately development outside the premises of the Local Plan.

**POP2(a) (Are there reasons not to use the housing figure of 517 per annum) -** Elberry Properties Ltd considers that it is appropriate for the LPA to seek to achieve housing provision and create a “development plan” fit to meet the needs of the current and future occupiers of the district, including provision of homes to meet and embrace housing needs.

**POP3(a) (Should EHDC help meet (1) all, (2) some or (3) none of SDNPs housing needs) -** Elberry Properties Ltd considers option 2 is most appropriate

**POP4(a) (Should EHDC (1) assist unmet needs regardless of location in SDNP (2) meet needs with direct relationship with East Hants communities, or (3) provide no assistance) -** Elberry Properties Ltd considers option 2 is most appropriate

**Issue: Types of Housing**

**HOU1(a) (What should policy on older persons accommodation include)-** Elberry Properties Ltd considers that emerging policy for provision of older person accommodation should be worded to encourage provision by way of facilitating a greater provision, rather than a fixed proportionate target.

**HOU2 (Is there anything else which should be included in the policy)-** Elberry Properties Ltd considers that should house types result in requirements for larger plot sizes delivering single storey accommodation / less efficient sites, then such policies should enable an appropriate level of flexibility to reduce requirements below the standard affordable housing provision.

**HOU4(a) (should there be a requirement on large sites for a percentage of adaptable housing) –** Yes. Elberry Properties Ltd would support a policy which requires larger sites to provide a percentage of adaptable new homes, provided that the proportion reflects a proportionate response to average needs and doesn't require new developments to overcompensate.

**HOU5(a) (Should there be a policy to set a percentage of smaller homes on all development sites)–** No. Elberry Properties Ltd considers that housing provision in terms of house sizes should reflect the housing needs of an area and be based on up-to-date assessments. A housing policy which encourages an appropriate housing mix should include reference to the site's context and the localised needs, rather than be set out as a mandatory proportion of a site's provision.

**HOU6(a) (should a percentage of smaller homes be a requirement on all developments or just sites over 10 units, select an option) –** No neither option should be implemented. Justification as above (HOU5a response). Housing mix should remain needs driven, context driven, and market driven, not prescribed by a local plan which will not keep pace with the factors listed herewith. It is considered that the options (limited to 2) should have included an option to place weight on not prescribing the housing mix.

**HOU7(a) (Affordable housing requirement is at 40% should the percentage (1) increase, (2) decrease or (3) stay the same –** Option 3, the provisions of affordable housing should remain the same. Decreasing the level will not help to achieve meeting the needs. Increasing the level will lead to a disproportionate provision of affordable housing over market housing. The preamble to this option only accounts for highlighting the shortfall of affordable housing it does not highlight (in balance) the shortfall in market housing. Potentially misleading. The other reason to maintain status quo is to avoid creating a situation where sites become unviable to deliver any housing; due to the ever-increasing costs of land, rises in building costs and reducing the amount of market housing on sites (should the level of affordable housing rise).

Elberry Properties Ltd – wish to add that when looking at brownfield sites the LPA should consider raising the number of units proposed before affordable housing is required to at least 15 as there are associated costs including existing buildings and residual value which necessitates higher purchase prices for land to develop. As such a low unit number trigger for affordable housing becoming required, leads to sites being unviable.

**HOU8 (Should other forms of housing be prescribed by the Local Plan) –** No.

**Issue: Environment**

**ENV1 (please order the four options by importance)**- Elberry Properties Ltd considers the following order as most important to least important:

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

**Issue: Infrastructure**

**IFR1 (What type of infrastructure is the most important)** - Order of preference: Transport / Utilities / Community / Health & Education / Sport & Green Space

**IFR2 (How do you feel about CIL funds)** – Neutral. Comment: Elberry Properties Ltd supports the use of CIL funds to be used locally to the area where new housing is provided. For the benefit of the proposed new residents and the existing residents in the area to meet their own needs.

**IFR3 (Which is the best site size for infrastructure provision through CIL)** – A mix of site sizes. Contributions are proportionate, as such the size of site question is superfluous. Comments on CIL in general: The fairest way to manage CIL is to invest it into the local area from where the funds are generated through new development. Investment should be into projects which benefit the widest demographic, or the greatest needs, (quantitative and qualitative) and should be identified by the local community.

**Issue: Development Strategy and Spatial Distribution****Development Strategy****DEV1 (Options for the Distribution of New Housing)**

In order of preference, Elberry Properties Ltd considers the order should be (from highest to lowest):

Option 3: Distribute new development by population: housing growth should be distributed in proportion to existing population levels

Option 2: Concentrate new development in the largest settlements: housing growth should be focused in larger settlements with more facilities and services

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 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

**DEV2 – Reason for ranking order** (above).

Option 3 enables growth to be proportional this allows settlements to grow at their own proportionate pace.

Option 2 enables new housing to be provided where there is the greatest level of existing services

Option 1 comparable to option 3, however, it is none specific as to the level of distribution and so could lead to a disproportionate level of provision in smaller areas if not done by existing population, as such as an option, it is an uncertain one.

Option 4 a new settlement would have no pre-existing heritage, custom or character. Hence the lowest rating.

**DEV3(a) (are there any alternative option to the 4 above)** - No. There are no new options to consider, however, Option 1 could be included as part of Option 3 i.e. the idea of identifying sites for development in locations with bus, pedestrian and cycle routes could be included in the proportionate option rather than a stand-alone option, because the two options appear to be seeking to cover similar circumstances.

**General Consultation questions**

**GEN1 (How do you feel about the consultation)** – Neutral. It is good to have an opportunity to provide representations, however, some of the questions have had limited scope for instance HOU6. Some of the preamble has also felt a little leading. The consultation is also very high level and not as detailed as it could have been.

**GEN2 – (Is there anything else you would like to tell us in response to this consultation).** - Yes.

Regarding Site: LIP-005, (historic SHLAA reference LIP034). Location: Land North of Haslemere Road. When it comes to looking at more detailed matters regarding implementing some of the strategic / high-level issues, priorities, and options, it is considered that LIP-005 meets an identified need and through design and layout accords with the aims and objectives set out in the Regulation 18 – Part 1 consultation regarding the Councils Vision; Population and Housing; the Environment; the Climate; Infrastructure. The types of Housing can of course be discussed with development management as part of a pre-application discussions.

Regarding the Council’s records on the Land Availability Assessment mapping system for LIP-005, it is noted that the LPA consider the site to be:

- Developable
- Available
- Achievable
- Deliverable (0 to 5 years)

Elberry Properties Ltd wish to confirm that this remains the case from their perspective. Over the past few months, the site has been surveyed by the development and design team with a view to developing an indicative site layout. The site layout has been sent to the Parish Council and we are actively engaging with the steering group with a view to working with the community. The site proposes to include a new footpath and cycle route through the site linking to the byway to the east with countryside PRow beyond, to avoid a stretch of Haslemere Road, which does not currently enable safe walking, as identified locally.

The site is considered to meet the needs of “living locally”, in terms of walking distance to Liphook’s shops and services. This is considered to make the site sustainable and meet the **Vision, Climate Emergency** as well as the **Population and Housing** Strategic aims and objectives by virtue of the location. Given the fact that the site

is on the bus route between Liphook and Haslemere and walking distance from Liphook station, plus the cycling and pedestrian improvements the site is also considered to be highly credible regarding the **infrastructure** aims and objectives, on the infrastructure issue the site adjoining the existing settlement also enables ease of connection to the local utilities.

It is also proposed to create a buffer to the SINC for biodiversity in addition to the provision of on-site open space in the form of a LAP and public benches to overlook the SINC and towards the Conservation Area for the wider public / community benefit of existing as well as proposed residents. This also respects the aims and objectives regarding the **Vision, Climate Emergency** and **Environmental** aims and objectives.

Regarding the Conservation Area. The River Wey Conservation Area follows the route of the River Wey between Hammer and Lindford covering a route distance in excess of 5 miles. The purpose of the designation was “designated in May 1983... in order to protect the series of aqueducts built along the River Wey... to create an extensive water meadow system”.

### Conservation Area

Due to the topography of the site (illustrated below-left) in an elevated position and as such is not part of any “water meadow system” (illustrated below-right EA flood map) and the fact that there are no aqueducts near the site it is considered that the Conservation Area boundary which was plotted in 1983 was done so in an illogical manner.

It is considered that the site was unintentionally included as part of the Conservation Area based on plotting from aerial images without consideration of the location of the aqueducts or topography of the area with respect to the formation of water meadows. The nearest known aqueduct is located to the west of London Road and Radford Park. There are no aqueducts to the east of the site and the next nearest aqueduct (after Radford Bridge) is located to the west of Bramshott over a mile away.

Finally, the last known aqueduct is understood to be located to the north of Headley. The site is elevated above Liphook and has a steep slope which is out of the floodplain. Due to the distance from the aqueducts and the site’s elevated position the site has no historic connection to the features of the River Wey.



As such it is considered that the site whilst in part included (by error or otherwise) within a Conservation Area has no impact or bearing on historic purposes of identifying the conservation area in the first place. As such, the proposed development of the site would not conflict with the purposes of adopting the conservation area. Furthermore, it is also considered that the proposed layout with large buffer to the SINC is actually a suitable proposal under the designation in any event

Brief discussions with the LPAs conservation and heritage team have taken place. It is considered that the appropriate course of action will be to submit a pre-application to the heritage team based on the above matter and the proposed layout and development to clarify their considerations regarding whether the proposed site, will have any significant impact on the historic rationale for the designation. This will form part of Elberry Properties Ltd engagement with the development management process.

The proposed development is edge of settlement and in a sustainable location. It would be built to current building standards, regarding carbon and climate change. The area of the site proposed for development is grazed paddock land, the proposals include a significant area of land to be left as natural open space, excluded from development and excluded from usable public space, as an ecological/biodiverse buffer between the proposed areas of built form and the SINC. In addition to the wild area buffer to the SINC, there is an area of BNG in the northwest of the paddock with a view to providing enhancement.

The orientation of the site is to have an ecological buffer fenced off as the slope levels off followed by shared open space which will be open to the public, existing and proposed residents, before circulation / movement space (pedestrian, cycle and proposed residents car movement space), with front elevations of housing facing the public realm with passive surveillance and significantly from a natural environment perspective, no ability to 'land grab' or 'garden creep' at the rear of properties which is often the case when residential properties back onto unmanaged natural open space.

The proposed layout is considered to protect the natural environment and improve community connectivity and sense of place, at the east side of Liphook on what is currently a private paddock / no public access. The proposed site will form part of the public realm and allow safe passage through the site by foot or cycle as well as presenting a logical edge of settlement facing the countryside rather than turning its back on it privately as at present.

The latter point of connectivity through the site the proposed development will incorporate a connection from the pavement which terminates outside 145 Haslemere Road and connect across the site to the Byway to the east of it and onwards into the Countryside's network of PRow.

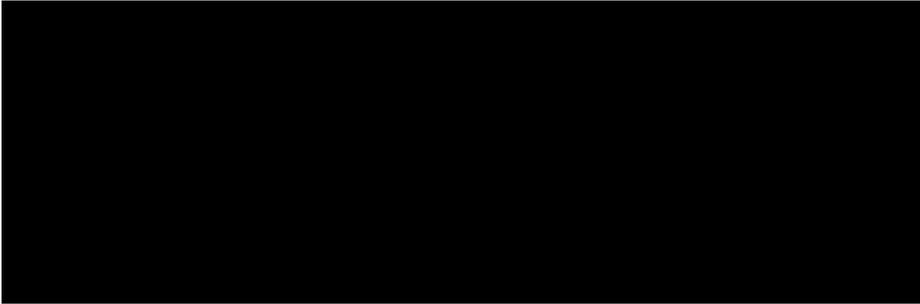
## Conclusions

LIP005 is considered in light of the Regulation 18 Part 1 consultation to accord with the LPAs Vision, Issues and Priorities. It is sustainably located and the proposed layout and design will meet the aims and objectives of the Local Plan. We would ask therefore that the site continues to be identified as: Developable; Available; Achievable and Deliverable in the next 5 years.

We are grateful for the opportunity to comment on the Council's Vision 2040, Issues and Priorities Regulation 18 – Part 1. Please ensure that we are kept fully informed of all progress on the Local Plan and any future opportunities to engage in the process.

If the Council requires any additional information, please do not hesitate to contact us. In the meantime, we look forward to receiving confirmation that the representations are duly made.

Yours faithfully,



Our Ref: [REDACTED]  
Your Ref:

Didsbury Business Centre  
137 Barlow Moor Road  
Didsbury  
Manchester  
M20 2PW

Planning Policy  
East Hampshire District Council  
Penns Place  
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BY EMAIL ONLY TO: [localplan@easthants.gov.uk](mailto:localplan@easthants.gov.uk)

9<sup>th</sup> January 2023

Dear Sir or Madam,

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

I am pleased to provide you with representations to the East Hampshire District Local Plan 2021-2040 Issues and Priorities Consultation on behalf of Bloor Homes Ltd. These representations are made with reference to a site promoted by my client and known as Horndean Expansion Land. The site lies immediately to the south of Local Plan Allocation HN1 Land East of Horndean, for which my client is developer of the central and southern section.

**Horndean Expansion Land**

The Horndean expansion land (which has also been known as Hazelton Farm) was the subject of a Regulation 18 Large Development Sites Consultation in 2019 as part of the now withdrawn draft Local Plan. Bloor Homes Ltd wish to promote this land for allocation in the emerging Local Plan and have prepared an updated document, setting out more detail on the vision for delivering this site. I have included this document as part of these representations.

The expansion land is a logical extension of a sustainable settlement, as extended by development on Local Plan Allocation HN1 'Land East of Horndean'. Homes on the expansion land would support employment generation at the Solen Freeport and assist in addressing unmet needs in the wider PfSH area. It would support a further range of services and optimise use of infrastructure provided as part of the Land East of Horndean development. For example, the two-form entry primary school consented within the outline permission for HN1 has been designed to allow for its extension and could be upgraded to support need generated by the expansion site. Importantly, it would also provide wider recreation opportunities through the creation of active travel routes from Horndean and Allocated Site HN1, which has already been designed to allow for active travel through the site, on through the Expansion Land to Havant Thickett and reservoir to the south of the site.

**Land East of Horndean**

Bloor Homes Ltd control the central and southern section of the allocation 'Land East of Horndean'. An extract of the Local Plan Policy Map showing the allocation is attached, along with a red line location plan showing the land the subject of the outline planning permission (55562/005). My client's site has outline planning permission for 800 homes. The permission will also deliver employment uses and essential services, including a local centre and a two-form entry primary school. Strong active travel connections will be provided to the existing developed area of Horndean, facilitating optimum

use of existing and new infrastructure and services and providing connections via public transport to the wider area.

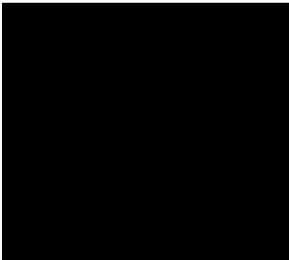
The site now forms the subject of a Reserved Matters application, which was submitted recently, and it is projected to start providing new homes by 2024. The northern portion of the allocation has planning permission for a care village and is also at an advanced stage of planning.

**Consultation Questions**

I have set out responses to the specific consultation questions in the attached table. Please do not hesitate to contact me if you require any clarification or additional information in respect of my responses.

Please note that I have provided these representations within the context provided by current national planning policy and guidance and the need to progress the Local Plan without further delay.

Yours faithfully,



**For and on behalf of White Peak Planning Ltd.**

## East Hampshire Local Plan 2021-2040 Issues and Priorities Consultation January 2023

Consultation Question	Response
<b>Vision Questions</b>	
VIS 1 How do you feel about this vision? (very happy, happy, neutral, unhappy, very unhappy)	In response to VIS 1, Bloor Homes Ltd is happy to support the vision.
VIS 2 Does the vision cover the key matters of importance that the Local Plan influence and inform?	The vision sets out key matters of importance
VIS 3 Should the vision be more specific about areas of the district being planned for through the Local Plan.	The vision should apply and set the standard for development in the district as a whole.
<b>Issues and Priorities</b>	
OV1 Please sort these key issues and priorities in order of importance to you. <ul style="list-style-type: none"> <li>• Climate Emergency</li> <li>• Environment</li> <li>• Population and Housing</li> <li>• Types of Housing Needs</li> <li>• Infrastructure</li> </ul>	No response proposed.
<b>Climate Emergency</b>	
CLIM1 Do you agree that new development should avoid any net increase in green house gas emissions, wherever practicable?	Local Plan policies to address the climate emergency must be evidence-based and aligned with national targets.
CLIM 2 What is most important to you? <ul style="list-style-type: none"> <li>• That the construction of new buildings should use less fossil fuels and more recycling of materials.</li> <li>• That all new buildings should be zero carbon</li> <li>• 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.</li> <li>• 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.</li> </ul>	See CLIM 1.

<ul style="list-style-type: none"> <li>• That trees and other green infrastructure could play an important role in reducing floor risks.</li> </ul>	
<p>CLIM 3 A best practice definition is considered to be one whereby:</p> <ul style="list-style-type: none"> <li>• 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;</li> <li>• The remaining energy demand is met with the equivalent amount of renewable power generation, either onsite or offsite;</li> <li>• 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.</li> </ul> <p>Do you agree that the Council should define ‘net-zero carbon development’ in this way? CLIM 3 a If you answered no, how should the definition be improved.</p>	<ul style="list-style-type: none"> <li>• A definition of net-zero carbon development should be subject to a proper technical review and consultation.</li> </ul>
<p>CLIM 4 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?</p> <p>CLIM 4a If you answered no, how should we balance the design of new buildings with the need to tackle climate change?</p>	<p>See CLIM 1.</p>
<p>CLIM 5 Should the detailed criteria for tackling climate change be specified in any of the following:</p> <ul style="list-style-type: none"> <li>• In the emerging East Hampshire Local Plan</li> <li>• In future neighbourhood plans</li> <li>• In local design codes</li> </ul> <p>CLIM 5a Explain your answer</p>	<p>Local Plan policies to address the climate emergency must be evidence-based and aligned with national targets unless there are justified localised matters that need to be dealt with at a more localised scale within the Local Plan itself, neighbourhood plans or local design codes. There is a risk of conflicting policies at different scales which could have an adverse impact on essential development being brought forward.</p>
<p>CLIM 6 How do you feel about using the idea of living locally to influence the location of new homes.</p> <p>CLIM 6a Please explain your response</p>	<p>See CLIM 1.</p>

<b>Population and Housing</b>	
<p>POP1 How you think we should proceed?</p> <ul style="list-style-type: none"> <li>• Use the standard method for calculation housing need as the basis for determining the requirements against which the five year housing land supply and Housing Delivery Test are measured.</li> <li>• Further explore whether exceptional circumstances exist to be able to devise a revised local housing requirement.</li> </ul> <p>POP1 a Please explain your answer.</p>	<p>Paragraph 3.20 of East Hampshire's Housing Needs Requirement Background Paper acknowledges that the SDNPA "will not necessarily plan to meet the full objective assessed need ... but will in effect meet local needs".</p> <p>Paragraph 4.15 of the paper refers to the Housing and Economic Development Needs Assessment Update (2022) which found an affordable housing need of 613 affordable homes per annum, equating to 97% of the standard method local housing need figure.</p> <p>In this context, it is highly unlikely that exceptional circumstances exist to be able to justify a revised lower local housing requirement. The standard method should therefore be used as a starting point to determine the minimum objectively assessed need for East Hampshire.</p>
<p>POP 2 Are there any strong reasons not to use the housing need figure of 517 new homes per year for the Local Plan?</p> <p>POP2 a Please explain your answers</p>	<p>The identified affordable housing need, as set out in the POP1 response, together with the recognition that the level of unmet need associated with the SDNPA and other neighbouring authorities (paragraph 4.36 of East Hampshire's Housing Needs Requirement Background Paper) is sufficient justification for upward revision of the 517 housing need figure to at least the identified 632 homes per annum identified using the standard method.</p>
<p>POP3 Based on the above should we meet:</p> <p>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</p> <p>POP 3 a Please explain your answer</p>	<p>Paragraph 3.20 of East Hampshire's Housing Needs Requirement Background Paper acknowledges that the SDNPA "will not necessarily plan to meet the full objective assessed need ... but will in effect meet local needs")., Given the limited delivery expected within the SDNP, it is appropriate to aim to meet the needs of East Hampshire's part of the SDNPA.</p>
<p>POP 4 At present we do not know the precise amount of unmet need, but we are aware of our neighbours seeking help, therefore do we:</p> <ul style="list-style-type: none"> <li>• Offer to assist with all unmet needs, regardless of scale and location;</li> <li>• Offer to assist with some unmet needs, where there may be a direct relationship with the communities of East Hampshire;</li> </ul>	<p>In line with national planning guidance, East Hampshire District Council should consider requests for help from neighbouring authorities to ascertain whether development needs that cannot be met wholly within a particular plan area could be met in East Hampshire (paragraph 26, NPPF, 2021).</p>

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<p>HOU2 Is there anything else that should be included in this policy?</p>	<p>No response proposed.</p>
<p>HOU3 Should the Local Plan include a specific policy on adaptable housing?</p>	<p>The Local Plan could include a specific policy on adaptable housing, indicating provision based on evidence of need and site suitability.</p>
<p>HOU4 Should there be a requirement on large sites for a percentage of new homes to be adaptable?</p> <p>HOU4 a Please explain your answer.</p>	<p>Specific requirements for adaptable homes should be set on a site by site basis subject to evidence of need and site suitability.</p>
<p>HOU5 Should the Local Plan include a policy to specify the percentage of smaller homes on development sites?</p>	<p>No. Housing mix policies should provide the necessary flexibility to reflect changing need and demand for homes across different locations and over the plan period.</p>
<p>HOU 5 a If yes, should this percentage focus on:</p> <ul style="list-style-type: none"> <li>1-2 bed homes</li> <li>2-3 bed homes</li> </ul>	<p>N/A</p>
<p>HOU6 Should a percentage of smaller homes to be provided on</p> <ul style="list-style-type: none"> <li>All development sites or</li> <li>Only large development sites (over 10 units).</li> </ul> <p>HOU6a Please explain your answer.</p>	<p>No. Housing mix policies should provide the necessary flexibility to reflect changing need and demand for homes across different locations and over the plan period.</p>
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HOU 8 Are there any other forms of housing that the Local Plan should refer to?  Hou 8a If yes, please state.	The local plan should refer to requirements for the provision of self-build plots.
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INF 1 What type of infrastructure is most important to you? Transport/health, schools, colleges, community facilities, sport, green spaces, energy supplies and water, internet and mobile phone reception.	No response proposed.
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INF 3 Which of these do you think provides the best outcome for infrastructure provisions? <ul style="list-style-type: none"> <li>• Many small sites dispersed across the district</li> <li>• Medium sized sites</li> <li>• Large sites</li> <li>• A mix of these</li> </ul> INF 3 a Please explain your answer.	Provision of development on larger sites provides the best outcome for infrastructure provision. For example, a large development is most likely to provide the economies of scale required to support provision of a new local centre within the development, providing community and retail infrastructure directly for, and within easy-reach of by active travel modes, the development
<b>Development Strategy</b>	
DEV 1 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	Based on the Plan attached to Option 2 in the East Hampshire District Council Spatial Development Options Background Paper, the Options, ranked in order of preference, are as follows:

<p>Option 4: Concentrate new development in a new settlement</p>	<ol style="list-style-type: none"> <li>1. Option 2: Concentrate new development in the largest settlements – as defined by ‘Option 2: Concentrate new development in the largest settlements, page 57 Issue and Options (2022) and page 9 Spatial Development Options Background Paper (2022) which includes for development within Tier 1 settlements and also Tier 2 settlements in the south of the district.</li> <li>2. Option 1: Disperse new development to a wider range of settlements</li> <li>3. Option 3: Distribute new development by population</li> <li>4. Option 4: Concentrate new development in a new settlement</li> </ol>
<p>DEV 2 Why have you ranked these options in this way?</p>	<p>Option 2 - concentrating new development in the largest settlements – presents scope to direct development to the most sustainable existing locations, making the best use of the sustainable elements of those settlements and reflecting the need for development within the south of the district close to neighbouring authorities and the Freeport.</p> <p>Horndean is a Tier 2 settlement which scores highly (25) within the range (15-29) for Tier 2 settlements in the East Hampshire Settlement Hierarchy Background Paper. It already benefits from a range of community facilities, such as a supermarket, GP surgery, sports pitches and community hall as well as both secondary and primary education. Building on larger sites within these locations is also more likely to ensure that sufficient infrastructure is provided to support these developments.</p> <p>Option 1 - with development in a wider range of settlements - is likely to place greater pressure on existing infrastructure. Additionally, whilst building homes nearer to schools in existing villages may increase the number of active travel journeys, travel to work patterns are such that these journeys will still be made by car due to the linked nature of the trip i.e. children are dropped off and picked up from school as part of a parent’s journey to work.</p> <p>Option 3 - distribute new development by population – has merit in that it does reflect the need to ensure that new housing is provided in the south of the district to meet identified need but it potentially fails to recognise the need for additional homes to support employment growth in neighbouring areas.</p>

DEV 3 Are there any alternative options we should consider?	No response proposed.
DEV 3 a If yes, please explain	N/A.

Our Ref: [REDACTED]  
Your Ref:

Didsbury Business Centre  
137 Barlow Moor Road  
Didsbury  
Manchester  
M20 2PW

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

[REDACTED]  
[REDACTED]

BY EMAIL ONLY TO: [localplan@easthants.gov.uk](mailto:localplan@easthants.gov.uk)

9<sup>th</sup> January 2023

Dear Sir or Madam,

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

I am pleased to provide you with representations to the East Hampshire District Local Plan 2021-2040 Issues and Priorities Consultation on behalf of Bloor Homes Ltd. These representations are made with reference to Land East of Horndean, a site promoted by my client. Land East of Horndean is allocated for housing and other mixed uses, as set out in Policy HN1 of the East Hampshire District Adopted Local Plan 2016 Housing and Employment Allocations (2016).

**Land East of Horndean**

Bloor Homes Ltd control the central and southern section of the allocation 'Land East of Horndean'. An extract of the Local Plan Policy Map showing the allocation is attached, along with a red line location plan showing the land the subject of the outline planning permission (55562/005). My client's site has outline planning permission for 800 homes. The permission will also deliver employment uses and essential services, including a local centre and a two-form entry primary school. Strong active travel connections will be provided to the existing developed area of Horndean, facilitating optimum use of existing and new infrastructure and services and providing connections via public transport to the wider area.

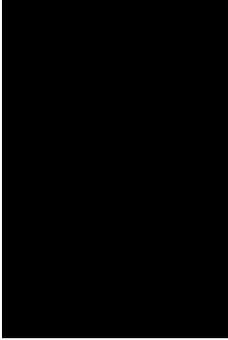
The site now forms the subject of a Reserved Matters application, which was submitted recently, and it is projected to start providing new homes by 2024. The northern portion of the allocation has planning permission for a care village and is also at an advanced stage of planning. As a sustainable extension to Horndean which is at an advance stage, the allocation should be carried forward in the emerging plan.

**Consultation Questions**

I have set out responses to the specific consultation questions in the attached table. Please do not hesitate to contact me if you require any clarification or additional information in respect of my responses.

Please note that I have provided these representations within the context provided by current national planning policy and guidance and the need to progress the Local Plan without further delay.

Yours faithfully,



**For and on behalf of White Peak Planning Ltd.**

## East Hampshire Local Plan 2021-2040 Issues and Priorities Consultation January 2023

Consultation Question	Response
<b>Vision Questions</b>	
VIS 1 How do you feel about this vision? (very happy, happy, neutral, unhappy, very unhappy)	In response to VIS 1, Bloor Homes Ltd is happy to support the vision.
VIS 2 Does the vision cover the key matters of importance that the Local Plan influence and inform?	The vision sets out key matters of importance
VIS 3 Should the vision be more specific about areas of the district being planned for through the Local Plan.	The vision should apply and set the standard for development in the district as a whole.
<b>Issues and Priorities</b>	
OV1 Please sort these key issues and priorities in order of importance to you. <ul style="list-style-type: none"> <li>• Climate Emergency</li> <li>• Environment</li> <li>• Population and Housing</li> <li>• Types of Housing Needs</li> <li>• Infrastructure</li> </ul>	No response proposed.
<b>Climate Emergency</b>	
CLIM1 Do you agree that new development should avoid any net increase in green house gas emissions, wherever practicable?	Local Plan policies to address the climate emergency must be evidence-based and aligned with national targets.
CLIM 2 What is most important to you? <ul style="list-style-type: none"> <li>• That the construction of new buildings should use less fossil fuels and more recycling of materials.</li> <li>• That all new buildings should be zero carbon</li> <li>• 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.</li> <li>• 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.</li> </ul>	See CLIM 1.

<ul style="list-style-type: none"> <li>• That trees and other green infrastructure could play an important role in reducing floor risks.</li> </ul>	
<p>CLIM 3 A best practice definition is considered to be one whereby:</p> <ul style="list-style-type: none"> <li>• 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;</li> <li>• The remaining energy demand is met with the equivalent amount of renewable power generation, either onsite or offsite;</li> <li>• 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.</li> </ul> <p>Do you agree that the Council should define ‘net-zero carbon development’ in this way? CLIM 3 a If you answered no, how should the definition be improved.</p>	<ul style="list-style-type: none"> <li>• A definition of net-zero carbon development should be subject to a proper technical review and consultation.</li> </ul>
<p>CLIM 4 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?</p> <p>CLIM 4a If you answered no, how should we balance the design of new buildings with the need to tackle climate change?</p>	<p>See CLIM 1.</p>
<p>CLIM 5 Should the detailed criteria for tackling climate change be specified in any of the following:</p> <ul style="list-style-type: none"> <li>• In the emerging East Hampshire Local Plan</li> <li>• In future neighbourhood plans</li> <li>• In local design codes</li> </ul> <p>CLIM 5a Explain your answer</p>	<p>Local Plan policies to address the climate emergency must be evidence-based and aligned with national targets unless there are justified localised matters that need to be dealt with at a more localised scale within the Local Plan itself, neighbourhood plans or local design codes. There is a risk of conflicting policies at different scales which could have an adverse impact on essential development being brought forward.</p>
<p>CLIM 6 How do you feel about using the idea of living locally to influence the location of new homes.</p> <p>CLIM 6a Please explain your response</p>	<p>See CLIM 1.</p>

<b>Population and Housing</b>	
<p>POP1 How you think we should proceed?</p> <ul style="list-style-type: none"> <li>• Use the standard method for calculation housing need as the basis for determining the requirements against which the five year housing land supply and Housing Delivery Test are measured.</li> <li>• Further explore whether exceptional circumstances exist to be able to devise a revised local housing requirement.</li> </ul> <p>POP1 a Please explain your answer.</p>	<p>Paragraph 3.20 of East Hampshire's Housing Needs Requirement Background Paper acknowledges that the SDNPA "will not necessarily plan to meet the full objective assessed need ... but will in effect meet local needs".</p> <p>Paragraph 4.15 of the paper refers to the Housing and Economic Development Needs Assessment Update (2022) which found an affordable housing need of 613 affordable homes per annum, equating to 97% of the standard method local housing need figure.</p> <p>In this context, it is highly unlikely that exceptional circumstances exist to be able to justify a revised lower local housing requirement. The standard method should therefore be used as a starting point to determine the minimum objectively assessed need for East Hampshire.</p>
<p>POP 2 Are there any strong reasons not to use the housing need figure of 517 new homes per year for the Local Plan?</p> <p>POP2 a Please explain your answers</p>	<p>The identified affordable housing need, as set out in the POP1 response, together with the recognition that the level of unmet need associated with the SDNPA and other neighbouring authorities (paragraph 4.36 of East Hampshire's Housing Needs Requirement Background Paper) is sufficient justification for upward revision of the 517 housing need figure to at least the identified 632 homes per annum identified using the standard method.</p>
<p>POP3 Based on the above should we meet:</p> <p>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</p> <p>POP 3 a Please explain your answer</p>	<p>Paragraph 3.20 of East Hampshire's Housing Needs Requirement Background Paper acknowledges that the SDNPA "will not necessarily plan to meet the full objective assessed need ... but will in effect meet local needs")., Given the limited delivery expected within the SDNP, it is appropriate to aim to meet the needs of East Hampshire's part of the SDNPA.</p>
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HOU 7a Please explain your answer.	
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<p>DEV 2 Why have you ranked these options in this way?</p>	<p>Option 2 - concentrating new development in the largest settlements – presents scope to direct development to the most sustainable existing locations, making the best use of the sustainable elements of those settlements and reflecting the need for development within the south of the district close to neighbouring authorities and the Freeport.</p> <p>Horndean is a Tier 2 settlement which scores highly (25) within the range (15-29) for Tier 2 settlements in the East Hampshire Settlement Hierarchy Background Paper. It already benefits from a range of community facilities, such as a supermarket, GP surgery, sports pitches and community hall as well as both secondary and primary education. Building on larger sites within these locations is also more likely to ensure that sufficient infrastructure is provided to support these developments.</p> <p>Option 1 - with development in a wider range of settlements - is likely to place greater pressure on existing infrastructure. Additionally, whilst building homes nearer to schools in existing villages may increase the number of active travel journeys, travel to work patterns are such that these journeys will still be made by car due to the linked nature of the trip i.e children are dropped off and picked up from school as part of a parent’s journey to work.</p> <p>Option 3 - distribute new development by population – has merit in that it does reflect the need to ensure that new housing is provided in the south of the district to meet identified need but it potentially fails to recognise the need for additional homes to support employment growth in neighbouring areas.</p>

DEV 3 Are there any alternative options we should consider?	No response proposed.
DEV 3 a If yes, please explain	N/A.



## Woolf Bond Planning

Chartered Town Planning Consultants

Our Ref: [REDACTED]

Email: [REDACTED]

16<sup>th</sup> January 2023

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

Response sent by email to [localplan@easthants.gov.uk](mailto:localplan@easthants.gov.uk)

Dear Sirs,

**East Hampshire District Local Plan 2021 to 2040: Issues and Priorities  
(Regulation 18 Part 1 Consultation (Nov 2022-Jan 2023))**

**Representations on behalf of Barratt David Wilson Homes**

### 1. Introduction

#### General

- 1.1. We refer to the above consultation exercise and respond on behalf of our clients, Barratt David Wilson Homes ("BDWH").
- 1.2. BDWH has a strong belief in the principle of the plan-led system and in setting out our representations upon the Regulation 18 Part 1 Consultation for the East Hampshire District Local Plan 2021-2040, we hope to be able to work with the Council in order to ensure the subsequent Local Plan is fit for purpose in seeking to facilitate sustainable development that can deliver the much needed new homes whilst also securing the provision of supporting infrastructure to ensure the creation of places where people will want to live and work in locations that are truly sustainable.

- 1.3. BDWH has considerable experience and expertise in dealing with and realising development schemes through the planning system.
- 1.4. In this context, we welcome the Council's preparation of the Local Plan, for which the current consultation is an initial step. The Local Plan should provide a strategy consistent with national policy to deliver the growth that the District and wider area needs.
- 1.5. Our comments have been informed by a review of the background documents which accompany the consultation exercise with the response framed by virtue of the different headings in the overarching Regulation 18 Consultation document.
- 1.6. BDWH has a controlling interest in **land south of Chalton Lane, Clanfield, which Site we are promoting as a housing allocation for up to approximately 200 dwellings** along with landscaped open space.
- 1.7. The planning policy context and the merits and suitability of the Site as a housing allocation are set out below.

## **2. Deliverable Opportunity for Housing Growth on land south of Charlton Lane, Clanfield**

### **Plans and Particulars**

- 2.1. Plans and particulars are submitted in support of our representations as follows:
  - Vision Statement (Jan 2023)
  - Transport Report (Jan 2023)

### **Context**

- 2.2. BDWH has a controlling interest in the land to the south of Chalton Lane, Clanfield. The Site extends in total to approximately 11ha.
- 2.3. The Site has been assessed in the Council's Land Availability Assessment ("LAA") as a developable site (Site Ref: LAA/CL-001).

- 2.4. We agree with the LPA's positive assessment of the Site as set out in the LAA, and expand upon its merits as a housing allocation below.
- 2.5. There are a range of substantial benefits associated with the allocation of the Site for housing that can assist in meeting identified housing need in a sustainable location, at one of the most sustainable settlements in the District<sup>1</sup>.

### **Sustainable Development Opportunity**

- 2.6. BDW has a history of legacy projects within EHDC, including the successful developments to the east of Green Lane, Clanfield at St James Place and Windmill View.
- 2.7. Both sites have provided additional community and sports facilities for the wider community, enhancing the recreation and community offer at Clanfield.
- 2.8. As shown on the accompanying Masterplan Vision Statement, the Site south of Chalton lane, Canfield is capable of accommodating approximately 200 dwellings (including 40% affordable housing), along with substantial areas of landscape open space.
- 2.9. As the Vision Statement explains, the technical team has assessed the merits of the site having regard to a range of technical considerations, including drainage, ecology, heritage, highways and landscape. The findings of those detailed studies have informed the masterplan proposals for the Site.

### **Highways and Sustainability**

- 2.10. As set out in the Council's Settlement Hierarchy Background Paper (2022), Clanfield is identified as the 7<sup>th</sup> most sustainable settlement in the District.
- 2.11. The supporting Transport Report prepared by Paul Basham Associates has assessed the suitability of developing the Site for housing in relation to highway and sustainability considerations.
- 2.12. As section 4 of the Report identifies, the Site is well located in terms of access to key facilities. As such, the site represents a good opportunity for

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<sup>1</sup> As assessed in the Council's Settlement Hierarchy Background Paper.

residents to take up sustainable modes of travel with good quality pedestrian and cycle links.

2.13. Table 2 on page 10 of the Transport Report helpfully sets out the accessibility of the site to local services and facilities. An extract is set below.

Facility/Service	Name/Location	Distance (m)	Walking Time (mins)	Cycling Time (mins)
Bus Stop (WB)	Peel Park	20m	1 minute	< 1 minute
Bus Stop (EB)	Peel Park	120m	1 minutes	< 1 minute
Playground	Peel Park Playground	100m	1 minute	< 1 minute
Outdoor Sports Pitches*	Clanfield Football Club	100m	1 minute	< 1 minute
Dentist*	South Lane Dental	300m	4 minutes	1 minute
Pubs*	The Rising Sun	300m	4 minutes	1 minute
Convenience Store*	Nisa Convenience Sotre	350m	4 minutes	1 minute
Post Office*	Nisa Convenience Sotre	350m	4 minutes	1 minute
Restaurant*	Cardamom	380m	4 minutes	1 minute
Community Hall*	Clanfield Memorial Hall	430m	5 minutes	2 minutes
Place of Worship*	St James Church	500m	5 minutes	1 minute
Junior School	Clanfield Junior School	550m	6 minutes	2 minutes
Youth or Social Club*	Clanfield Scout Hut	560m	7 minutes	2 minutes
Creches or day nurseries*	Little Gems Day Nursery	630m	8 minutes	3 minutes
Infant School	Petersgate Infant School	1.4km	17 minutes	4 minutes
Cafes*	Chandlers	1.5km	17 minutes	5 minutes
GP Surgeries*	The Clanfield Practice	1.5km	17 minutes	5 minutes
Pharmacies*	Rowlands Pharmacy Clanfield	1.5km	17 minutes	5 minutes
Secondary School*	Horndean Technology College	4.4km	53 minutes	14 minutes
Railway Station*	Rowlands Castle	8.7km	N/A	35 minutes

2.14. It is evident from Table 2 that the proposed development is within a short walking distance of several local amenities and therefore presents a great opportunity for a sustainable development.

- 2.15. When the list of amenities identified in Table 2 is compared to that identified in Appendix D of the EHDC's Settlement Hierarchy Background Paper it appears that some additional amenities are located close to the site, including youth/social club, pub, outdoor sports pitches and dentist.
- 2.16. Clanfield and the Site could therefore increase its scoring from 18 out of 40 to 22 out of 40, given that all the facilities listed as still within a 20 minute walk as per the methodology.
- 2.17. As the above table demonstrates, the site is within 20 minutes of a significant number of facilities (and less than 15 minutes for most facilities). The Site inherently embraces the 20 minute neighbourhood concept, adopting the best principles contained in 'The 20-Minute Neighbourhood' guide produced by the Town and Country Planning Association (TCPA). This also demonstrates that the Site is accessible given there are further facilities located close-by that are not included within the Settlement Hierarchy Background Paper and thus the Site should be considered suitable to support sustainable development.
- 2.18. It is clear that local services and facilities are within walking and cycling distance, which accords with the approach to sustainable development set out in the NPPF.
- 2.19. In addition to the above, development of the site for housing provides the opportunity to enhance the footpath connections across the site in order to improve their attractiveness and usability all year round. This represents a material benefit in relation to enhancing local permeability and accessibility between existing residential areas.
- 2.20. The following conclusions may be drawn from the content of the Transport Report:
- The Site is well located in terms of existing local amenities, benefitting from being in close proximity to local bus infrastructure, providing linkages between the site and both Petersfield and Havant. Services are also available to Portsmouth and Horndean within Clanfield village.
  - The Site also benefits from linking to the existing pedestrian network within Clanfield and the accessibility of the site is also supported by the surrounding residential communities, including recently consented

and implemented residential development proposals.

- The Site also presents an opportunity to improve accessibility for the existing residential communities of Clanfield via delivering a permeable development and improving the PROW network through the site. The Site will facilitate connectivity and encourage pedestrian/cycle linkages between new and old Clanfield which otherwise wouldn't be possible, without this site coming forward.
- A trip generation exercise has been undertaken to assess the likely traffic impact of the proposed development. This confirms that the proposed development is likely to generate a total of 100 vehicle and 27 pedestrian movements in the AM peak (0800 – 0900) and 100 vehicle and 18 pedestrian movements in the PM peak (1700 – 1800), with a total of 911 vehicle and 194 pedestrian movements throughout a 12-hour period.
- A trip distribution exercise has been undertaken utilising 2011 Journey to Work Census data. This confirms that 68% of vehicular trips are likely to head eastbound (towards the Strategic Road Network) and 32% of vehicular trips are likely to head westbound from the proposed site access.
- The Site would be served by one point of vehicular access onto Chalton Lane and would be provided in the form of a bellmouth junction. The access road would measure 6m in width supported by 12m radii and a 2m wide footway will flank either side to tie into the existing infrastructure. Visibility has been demonstrated as achievable to meet the recorded 85th%ile vehicle speeds. An additional emergency access may be achievable via Sunderton Lane which borders the site to the east.
- A junction capacity assessment has been undertaken to determine the capacity of a new access. The assessment has demonstrated that access arrangement would operate well within capacity in both the AM and PM peaks with low queue lengths and delays of less than 13 seconds on all arms throughout all the scenarios and time periods
- The assessment concludes that the site has the potential to provide a sustainable and deliverable form of development and is entirely appropriate in highway terms.

## **Landscape Considerations**

### General

- 2.21. The Vision Statement demonstrates the acceptability of developing the Site in landscape terms, including in relation to the impact on views into and from the neighbouring South Downs National Park.

2.22. A Landscape and Visual Impact Assessment was undertaken to inform the evolution of the Masterplan proposals, the content of which also considered the findings of the Council's Landscape Capacity Study<sup>2</sup> and concludes that there will be no significant residual landscape effects. This includes in relation to the neighbouring South Downs National Park.

#### Reviewing The Council's Landscape Capacity Study

2.23. As set out in the executive summary to the Council's Landscape Capacity Study, its aim is to provide landscape evidence that will be weighed with all the other evidence as part of the plan making process.

2.24. It is stated that the object of the Study is to identify those parts of the District that are the least sensitive in landscape and visual terms to development, enabling EHDC to select those areas it wishes to investigate further for potential housing development.

2.25. The Site has been assessed as part of 'Local Area 3f.1 Clanfield' as set out in East Hampshire DC Landscape Capacity Study –September 2018

2.26. Area 3f.1 is assessed as having a medium/low capacity overall to accommodate development (Figure 3f.1 refers).

2.27. The conclusion notes that there are some small areas within the assessment area that could accommodate new development; adding that the northern section is characterised by a number of small fields with robust hedgerows which could accommodate development.

2.28. Landscape consultants SLR Consultants Ltd have reviewed the Council's Landscape Capacity Study.

#### *Methodology*

2.29. They identify a significant issue with the "landscape sensitivity assessment" (Stage 2 of the process, see table 2).

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<sup>2</sup> Prepared by Terra Firma obo EHDC (Sept 2018)

- 2.30. As the Guidelines on Landscape and Visual Impact Assessment (GLVIA3) state, sensitivity should be defined by combining susceptibility to a type of development with the value of the landscape.
- 2.31. The factors in Table 2 are therefore susceptibility factors, not sensitivity factors: this is more than a semantic because the definition of susceptibility in GLVIA3 is *“the ability of a landscape ... to accommodate the proposed development without undue consequences for the maintenance of the baseline situation”*. One of the key factors that makes a landscape more able to accommodate residential development is the presence of existing residential development (or other suburban or developed uses) on the site, or, failing that, the visual influence of existing housing/development over the site. In essence a site is far more susceptible to change from new housing if it is remote and entirely rural and tranquil, with no influence of existing housing. But of the 34 factors listed in table 2 not one refers to the presence of existing housing, or the visual influence of existing housing over the land.
- 2.32. The same is also true for visual sensitivity, (stage 1 in the assessment process). Table 1 identifies 14 factors that are used to determine the visual sensitivity of a site; these are all perfectly valid, but the factor that is missing is the presence of existing housing, or visibility of existing housing. As with landscape sensitivity, views will be far more sensitive to residential development if they do not contain any existing housing.

#### *Assessment of Parcel 3f.1*

- 2.33. As set out above, the Site is included within a much larger assessment parcel, local area 3f.1.
- 2.34. As the study fairly says, there may be smaller parcels that may be less constrained in landscape terms.
- 2.35. In this case 3f.1 includes a small parcel of land north of Chalton Lane and immediately adjacent to the South Downs National Park. Furthermore, over half the area of 3f.1 includes a steeply sloping and visually prominent area south of Drift Road.

- 2.36. The assessment parcel therefore includes areas which are more sensitive than the Site itself, and the capacity assessment is therefore correct when it states that there is a smaller part of the site that is less constrained in landscape terms.
- 2.37. As such, the Study should be revised to include a finer grained analysis of sites falling within wider assessment areas.

#### *Study Conclusions*

- 2.38. The study concludes that area 3f.1 has medium to low capacity to accommodate residential development, the second lowest level of capacity out of five.
- 2.39. The study states that the area has medium/high visual sensitivity, medium landscape sensitivity and medium value.
- 2.40. One particular factor that is said to limit the capacity of this area to accommodate development is the potential "*impact of rural setting of historic village core of Clanfield*".
- 2.41. We have a number of issues with these conclusions:
- (a) It is notable that, looking at the landscape capacity summary maps (figures 12 and 13), the vast majority of assessment parcels are assessed as having low or medium/low capacity for development. Only three parcels are assessed as having medium capacity, and one medium/high. None have high capacity. In this context, even if the Capacity Study is taken on face value it means that a medium/low capacity places a site in the top half of all sites in terms of landscape capacity.
  - (b) As noted above, the assessment parcel 3f.1 is much larger than the proposed site, and includes areas which are more sensitive in landscape and visual terms, particularly the more rural, visually prominent area at the south of the assessment parcel. The proposed site therefore has more capacity for residential development than the Medium/Low conclusion suggests.
  - (c) The Capacity Study assumes a development scenario based upon 15-30 dwellings per hectare, with 2 to 3 storey homes and the required quantum of open space (see page 9). It is of course understandable that the study cannot apply a much more nuanced approach to potential development, which provides more than the standard POS, and avoids the most

sensitive areas. In the case of this proposal, one of the key features of the masterplan in the Vision Document is the retention of a large open space south of Chalton Lane, occupied by species rich grassland, which would thus retain the sense of a rural setting at the village Core of Clanfield, whilst also respecting the setting of the National Park.

- (d) The detailed assessment record sheet for 3f.1 (Appendix B) notes under settlement pattern that “*the northern section is enclosed on three sides by Clanfield. To the east, Sunderton Lane includes a row of detached and semi-detached properties with large gardens, then higher density development beyond. To the west is the historic core of Clanfield with a number of listed buildings...*” It is telling that in this context the sensitivity of the landscape is assessed as being medium, and if the influence of housing across the site was fully factored in (see my comments on methodology, above), this could be lower.
- (e) The detailed assessment record in relation to visual sensitivity states that the parcel as a whole has medium to high visual sensitivity, and yet the general visibility section focuses on parts of 3f.1 that are largely outside of the proposed site. In terms of the sensitivity of the skyline, specific mention is made of “*within the southern section, there is a local ridge N-S alignment, visible from surrounding area*” and “*southern section – open downland*”. It is therefore clear that the Capacity Study acknowledges that the southern part of 3f.1 is far more visually sensitive than the northern section, and yet the whole area is concluded to have medium to high visual sensitivity.
- (f) Value is assessed as being medium for the whole parcel, as the site is within the setting of the SDNP but has no other designations.

#### *Conclusions of SLR’s Landscape Capacity Review*

- 2.42. The Capacity Study is understandably large scale and broad brush, and acknowledges that smaller parts of assessment parcels might have more capacity for development.
- 2.43. In the case of parcel 3f.1, it is clear that the southern section of this parcel is much more sensitive in landscape and visual terms than the northern section, within which the proposed site is located.
- 2.44. It is also clear that a more subtle approach to design, providing a central, large open space south of Chalton Lane, could further reduce the potential effects of development.

2.45. The Capacity Study methodology does not take full account of the presence/visual influence of existing housing when considering the capacity for development; in this context it is notable that the study acknowledges that the northern part of 3f.1 is surrounded by houses on three sides, with a road (Chalton Lane) on the fourth, and all of these built forms influence the character of the intervening fields, reducing their susceptibility to residential development.

#### *Landscape Assessment*

2.46. The landscape assessment work undertaken to inform the masterplan proposals for the Site conclude that Site has a medium landscape sensitivity and a medium magnitude of landscape impact. Overall, the significance of the landscape character is assessed as moderate i.e. not significant in landscape terms.

2.47. The Site can accommodate the quantum of proposed development; and as shown on the accompanying Masterplan Vision Statement, development of the Site for housing can include substantial areas of landscaped open space.

2.48. The Masterplan Vision Statement demonstrates how this would be achieved, in so far as the masterplan is landscaped-led and provides for substantial areas of landscaped open space. This includes an appropriate set back and sensitive design response to the northern edge of the site.

2.49. The Site is not subject to any national and/or local landscape designations. However, the National Park boundary does extend up to Chalton Lane to the north of the Site and the Site is also identified in the adopted development plan as being within a local gap. However, local gap designations will necessarily need to be reviewed as part of the Local Plan process.

2.50. As set out in the Masterplan Vision Statement, the landscape context and merits of the site for housing development are summarised as follows:

- i. The views into the Site have been carefully considered in terms of the design, scale and integration with the landscape setting with views to and from the surrounding landscaping and adjacent residents;

- ii. These existing public rights of way are to be maintained and will influence the shape and form of the site;
  - iii. The development has the opportunity to deliver significant areas of high quality landscape;
  - iv. The development can provide strong connections and to link to existing facilities within the area, and alternative sustainable modes of movement within the village;
  - v. Existing vegetation is to be retained, managed and respected by the development, particularly to the edge of the development. Loss of vegetation in the core of the site is proposed to deliver a new landscape character and support the best use of land;
- 2.51. As to the local gap designation that is defined in the Core Strategy (Policy CP23 refers), the policy is clear that development is acceptable if it does not undermine the physical and visual separation of settlements, it does not compromise the integrity of the gap, and it cannot be located elsewhere. Accordingly, in coming to an informed view as to the role played by land within a designated local gap, one needs to assess the function of this space in fulfilling that policy.
- 2.52. The functionality/role of the site in relation to the local gap policy is considered at page 13 of the Masterplan Vision Statement.
- 2.53. It is stated that the Site does not provide for the separation of settlements as it is within the same settlement and as such cannot be contrary to criterion A.
- 2.54. With regards to criterion B the function of the gap as stated by policy is "the generally open and undeveloped nature of the gaps between settlements will be protected to help prevent coalescence and retain their separate identity". In so far as this gap is not between settlements and the space only functions as a green space, its development would not result in the loss of identity of the settlement of Clanfield or coalescence between settlements.
- 2.55. Criterion C is the decision making process for East Hampshire in relation to the approach to the future location of growth.
- 2.56. Given the presence of the National Park and the recognised settlement hierarchy, there are only certain settlements which are sufficiently sustainable to maintain appropriate growth.

- 2.57. Clanfield is one such settlement which has exceptional facilities for the community. However, outward expansion is restricted by the National Park to the north and wrapping around to the west, the A3M to the east, and the settlement gap between Horndean/Catherington/Clanfield to the south. As such the settlement is constrained. However, the Site south of Chalton Lane functions well as a location for growth as it does not compromise the protection of the National Park, the identity of the settlement or result in coalescence of settlements.
- 2.58. On the basis of the foregoing, including on account of the sustainable merits of Clanfield and its position within the settlement hierarchy, the Site provides a sustainable and appropriate location for future growth of Clanfield in helping to meet identified housing needs during the plan period.

### **Heritage**

- 2.59. A heritage assessment has also informed the evolution of the Masterplan proposals for the Site.
- 2.60. The heritage assets assessed largely comprise of vernacular 17th and 18th buildings with 19th century alterations and additions. Their significance is in part derived from their group value with one another, making up the historic nucleus of Clanfield.
- 2.61. The immediate setting of the designated heritage assets therefore makes a positive contribution to their significance
- 2.62. The wider setting of the heritage assets, including the Site and further east towards Windmill Hill, has been partially eroded by development of the mid-late 20th century, most notably the 1970s housing along Nickleby Road. There is also no inter-visibility between the Site and the majority of the listed buildings, with only the belfry of St James Church visible from within the Site.
- 2.63. The Site itself therefore makes a neutral contribution to the setting, and consequently to the significance of the relevant listed buildings.

- 2.64. It is anticipated that there will be no inter-visibility between the proposed development and the majority of the identified heritage assets, whilst views of St James Church will not be adversely impacted. This is due to, the low height of the proposed dwellings and the preserved view of the belfry from Chalton Lane. The proposed development is located away from the historic nucleus of the village and sympathetic to the setting of the listed buildings. The retained area of Alternative Natural Green Space ensures a level of distinction between the historic nucleus and the new development, providing a green buffer to the listed buildings which is in keeping with the rural character of the area.
- 2.65. The only heritage asset partially visible from the Site is the Church of St James, with its belfry rising above the development along Nickleby Road. The views towards the belfry are mainly important as a marker for those travelling into Clanfield from Chalton Road rather than from the Site. The view towards the belfry from Chalton Lane will be preserved and will also still be visible from within the retained open areas of the Site. It is anticipated that the proposed development will not be visible from the listed buildings, due to the low height of the dwellings.
- 2.66. The proposals are sympathetic to the setting of the heritage assets, retaining part of the open land ensuring a level of separation between the Site and the group of Listed Buildings.
- 2.67. Overall, the proposals are considered to cause no harm to the significance of the relevant listed buildings.

### **Benefits**

- 2.68. Development of the Site for housing secures many benefits, including as follows:
- Delivery of circa 200 new homes (including policy compliant affordable provision)
  - Aiming for provision of 10% Biodiversity Net Gain
  - Provision of quality open public space

- Support the employment of 620 people (Figures derived from HBF Economic Footprint Calculator (available online))
- Provision of Sustainable urban drainage (SuDs)
- Creation of Green Infrastructure, new planting and hedgerows
- Provision of cycle/pedestrian trails
- All new homes are to be within 10 minutes' walk of frequent bus services, primary school, nursery, local store.
- Site is available and delivered by BDW who are an HBF 5 Star Housebuilder

### **3. The Plan Period**

- 3.1. The Regulation 18 – Part 1 consultation document covers the period 2021 to 2040. However, the derivation of Local Housing Need relies upon the projected growth in households from 2022 through to 2032. Since the household growth projections will have incorporated the occupation of any dwellings completed in the 2021/22 monitoring year, this should be omitted from the plan period. Our separate but related response to the provisional housing target is provided in section 4 of this statement.
- 3.2. The Local Development Scheme (August 2022)<sup>3</sup> outlines the timetable for the preparation of the Local Plan. This envisages (section 4) consultation on a draft Submission Plan in spring 2024 with the examination expected to commence autumn 2024 and adoption in autumn 2025. Whilst this indicative timetable is repeated in the Regulation 18 Part 1 consultation document (page 6), this is not considered realistic.
- 3.3. Although it is noted that the Government is contemplating refinements to plan making procedures through the Levelling Up and Regeneration Bill and updates to the NPPF<sup>4</sup>, a review of the time taken for the examination of Strategic Local Plans submitted since 24<sup>th</sup> January 2019 (as referenced in paragraph 220 of the current NPPF) indicates<sup>5</sup> that for the 31 plans found sound, the examination period was 540 days (or 18 months). The same analysis also indicates that the period from commencement of the

<sup>3</sup> [Local plan timetable | East Hampshire District Council \(easthants.gov.uk\)](https://www.easthants.gov.uk/local-plan-timetable)

<sup>4</sup> A consultation on this is underway from 22<sup>nd</sup> December 2022 until 2<sup>nd</sup> March 2023 - [Levelling-up and Regeneration Bill: reforms to national planning policy - GOV.UK \(www.gov.uk\)](https://www.gov.uk/levelling-up-and-regeneration-bill)

<sup>5</sup> [Local Plan: monitoring progress - GOV.UK \(www.gov.uk\)](https://www.gov.uk/local-plan-monitoring-progress)

consultation on a draft submission plan through to receipt of the Inspector's Report was on average 763 days (or 2 years 1 month).

- 3.4. Applying this to the potential consultation on a draft submission Plan in spring 2024 indicates that receipt of the Inspector's Report could occur in late spring 2026 with adoption after this. Any delays in the consultation from the Council's expected spring 2024 will consequently delay an adoption date later in 2026, rather than 2025 as currently envisaged.
- 3.5. Furthermore, assuming the timetable in the LDS is achieved with submission in autumn 2024, the above analysis again indicates that allowing a minimum 18 months for the examination means that an Inspector's Report would again be received in spring 2026. The adoption date would therefore be after this.
- 3.6. Since the NPPF (paragraph 22) is clear that strategic policies should look ahead at least 15 years post adoption, the plan period should therefore extend until at least March 2042 given the Council's monitoring relates to broadly financial years (1<sup>st</sup> April to subsequent 31<sup>st</sup> March). This will therefore provide flexibility if the adoption of the plan occurs in late Spring 2026 after the 31 March date associated with the typical approach to monitoring. The Draft NPPF under consultation from 22<sup>nd</sup> December 2022 through to 2<sup>nd</sup> March 2023 retains within paragraph 22 a need to plan for a minimum of 15 years post adoption.
- 3.7. As explained, an extended plan period also provides flexibility to accommodate any delays in its preparation, especially if the envisaged consultations occur later than currently envisaged. The above analysis indicates that the plan period should therefore cover from April 2022 through to at least March 2042. This has consequential implications for assessments of the need within the district.

## **4. Population and Housing**

### **The Housing Requirement**

- 4.1. Page 21 onwards of the consultation draft Local Plan explains the derivation of the district's Local Housing Need, which approach includes adjustments to reflect the geographical 'split' between those parts of East Hampshire inside and outside of the South Downs National Park ("SDNP").
- 4.2. Table 5.1 on page 23 of the consultation draft Local Plan identifies a minimum Local Housing Need ("LHN") of 632 dwellings annually from 2022 across the whole of East Hampshire District.
- 4.3. As page 26 explains, the 632dpa figure is to be met by the provision of 517dpa within that part of EHDC excluding the SDNPA, with 115dpa to be met within that part of EHDC within the SDNP.
- 4.4. As such, and for the purpose of this Local Plan, the relevant figure is the 517dpa.
- 4.5. Page 26 also explains, this equates to 9,823 homes. Excluding existing supply (completions, sites with planning permission, existing allocations, and a windfall allowance), the council identifies a need to plan for approximately 3,405 new homes through the emerging Local Plan. This is a minimum requirement.
- 4.6. However, and as set out in section 3 above, the plan period should cover an additional 2 years, which requires land for a further 1,034 dwellings to be identified (2 years x 517dpa). This results in a need to plan for 10,857 dwellings as a minimum.

### **Unmet Housing Need: Duty to Cooperate**

- 4.7. In addition, to the minimum requirement to meet locally derived housing needs, paragraph 61 of the NPPF is clear that consideration of a higher housing requirement figure above the LHN could be factored in, particularly where neighbouring areas have unresolved needs.

- 4.8. That part of the District south of the SDNP (including where our client's Site at Clanfield is located) is within the Partnership for South Hampshire sub-region.
- 4.9. The ongoing work undertaken by the Partnership highlights that a number of local authorities within it, including the City of Portsmouth together with the Borough of Havant (which adjoins East Hampshire) have unmet housing needs.
- 4.10. It is clear that East Hampshire generally, and specifically the area south of the SDNP, should be explored in detail in relation to its potential to address this unmet need. This further justifies the provision of additional growth at Clanfield, and specifically our client's Site, which Site has been assessed by the Council as being deliverable.
- 4.11. This wider consideration of the part of the District south of the SDNP should also take account of the acknowledged sustainability of this location for growth when evaluated in a cross-authority manner. This is illustrated by the existing commitment for growth west of Waterlooville within the joint plans of Havant Borough and the City of Winchester District.
- 4.12. As explained below, the clear relationship of the southern parts of East Hampshire District to the significant employment, retail, leisure, cultural and educational opportunities in and around Waterlooville, Havant and Portsmouth would indicate that this is a clear location for sustainability growth, especially taking account the existing public transport services.
- 4.13. Further growth within the vicinity of Waterlooville (including in the southern parts of East Hampshire at Horndean and Clanfield would consequently reflect this).
- 4.14. The failure of the plan to accommodate additional growth to contribute towards the unresolved needs of the Partnership for South Hampshire (including that arising from the neighbouring authority of Havant Borough) is an indication that the plan as drafted is inconsistent with National Policy.
- 4.15. Therefore, having regard to the questions posed by draft Local Plan (question POP4), it is essential that the Council offers to assist in meeting the needs of neighbouring areas within the parts of the district with a clear functional relationship.

- 4.16. This is illustrated by the clear relationship between the part of the district south of the SDNP and the wider Partnership for South Hampshire.

### **Summary**

- 4.17. To conclude, the 10,857 dwelling requirement should be met as a minimum during the plan period to 2042 (@ 517dpa), with additional provision to be made to address unmet needs arising from neighbouring authorities.
- 4.18. In planning for the unmet needs from neighbouring authorities, the Local Plan should provide for growth at locations to the south of the SDNP that are within the functional relationship of PUSH. This includes the need to plan for growth at Clanfield.

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

### **General**

- 5.1. The draft Local Plan identifies a number of options for delivering growth across the plan area, comprising as follows:
- **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
- 5.2. Given the clear need for growth in the southern part of the District, both to support the existing communities alongside contributing towards unmet housing needs across the Partnership for South Hampshire area (especially arising in Havant Borough and the City of Portsmouth), a strategy which includes a greater range of growth locations should be selected. As such, **we**

**support a hybrid of options 1 and 2.** This will ensure growth is located at the most sustainable locations.

- 5.3. Additionally, whilst the assessment suggests that a dispersal strategy will prioritise access by walking and cycling, this negates the important role that access by public transport (including bus has). Furthermore, the existing assessment has not adequately considered the clear accessibility of the southern part of the district to other centres with employment, commercial and recreational opportunities in neighbouring authorities such as Waterlooville and Havant.
- 5.4. Whilst these are beyond a walking distance, they are accessible by cycling and/or bus services and therefore could readily contribute towards a sustainable lifestyle. This is especially noted as within Clanfield itself there are a number of existing facilities<sup>6</sup> for activities including those associated with both post offices<sup>6</sup> and associated convenience stores alongside the primary school. These collectively emphasise the suitability of Clanfield for growth as part of a wider strategy for development in the southern part of the District.
- 5.5. Growth in the southern part of the district should also be reflective of its role in accommodating around 25% of the non-SDNP population of the district (as indicated in option 3), although this should be adjusted to reflect the potential of this area to address unmet needs for the wider Partnership for South Hampshire area.

### **Merits of Clanfield as a Growth Location**

- 5.6. As set out above, our representations highlight the suitability of Clanfield as a location for growth within the plan area, especially taking account of its clear relationship to the wider opportunities within the Partnership for South Hampshire area and its consequential role in meeting wider needs. This is irrespective of the clear suitability of the village for development and the wider ability of the village to deliver on the wider aspirations of a 20 minute neighbourhood.

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<sup>6</sup> 14 White Dirt Lane (PO8 0QL) and 5-7 South Lane (PO8 0RB)

- 5.7. Whilst the Council's assessment has considered the impacts of a 20 minute walk (equates to 1,200m)<sup>7</sup>, it is not considered to have fully assessed the extended distance feasible within a 20 minute cycle.
- 5.8. Although a typical walking speed is 3mph<sup>8</sup> (4.8kmph) there is no equivalent provided for cycling. As cycling is feasible at a faster speed, the distance travelled will be greater.
- 5.9. The Department of Transport document LTN 02/08 'Cycle Infrastructure Design'<sup>9</sup> (section 2.2) explores typical cycle trip distances and confirms that **"two out of every three personal trips are less than five miles in length – an achievable distance to cycle for most people, with many shorter journeys also suitable for walking. For school children, the opportunities are even greater: three quarters of children live within a 15 minute cycle ride of a secondary school, while more than 90% live within a 15 minute walk of a primary school"**.
- 5.10. This confirms the potential for longer trips by bicycle, which will include commuting to work alongside those to secondary education as outlined above. Accordingly, this indicates that the geographical extent of the 20 minute neighbourhood will be enlarged from that envisaged by the Council.
- 5.11. This must be based on a comprehensive assessment of existing services rather than that based on existing policy designations including defined centres.
- 5.12. As is accepted in the Council's analysis of Clanfield, since the village has two post offices<sup>10</sup> with associated convenience stores, each surrounded by a range of local services including community hall, healthcare, recreation and public transport, they can both act as a centre for the 20 minute neighbourhood.
- 5.13. Furthermore, whilst there are services within Clanfield, bus services are readily available to take residents within 30 minutes to the wider opportunities both within (Petersfield and Horndean) and beyond the district (Cowplain and

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<sup>7</sup> The table following paragraph 3.9 of the Settlement Hierarchy topic paper indicates that a 20 minute walk could extend to 1,600m, there is no equivalent appraisal of the distances covered by bicycle. The

<sup>8</sup> As referenced in footnote 2 (page 6) of the Settlement Hierarchy Topic Paper

<sup>9</sup> <https://www.gov.uk/government/publications/cycle-infrastructure-design-ltn-120>

<sup>10</sup> 14 White Dirt Lane (PO8 0QL) and 5-7 South Lane (PO8 0RB)

Waterlooville) thereby contributing towards sustainable lifestyles. This is in addition to their proximity as cycling destinations which also contributions towards a sustainable lifestyle.

- 5.14. As the services also provide for journeys to and from work, this is a further indication of the suitability and sustainability of Clanfield, including the land controlled by our clients south of Chalton Lane.
- 5.15. Further analysis of the relevance of the 20-minute neighbourhood is contained in the transport Report prepared by Paul Basham Associates that accompanies our representations.
- 5.16. The TCPA Guidance<sup>11</sup> on 20 minute neighbourhoods (page 19) states “**Not all neighbourhoods will include a full range of services or facilities accessible by foot, which is why it is important to provide high-quality cycling routes and public transport for longer journeys to other places.**” As outlined, these opportunities are available at Clanfield with its ready accessibility to a wider range of services and facilities within other areas of the district south of the SDNP or in adjoining authorities (including at Waterlooville).
- 5.17. The Infrastructure Section of the consultant draft Local Plan references the different opportunities that development can provide towards enhancing infrastructure including the level of CIL contributions.
- 5.18. Whilst it references the ability of larger schemes to deliver on site infrastructure, it fails to highlight that some infrastructure is only warranted for the very largest schemes which are unlikely to be forthcoming in the plan area i.e. a significant number of dwellings is necessary to demonstrate the need for a new primary school is essential having regard to the envisaged number of children of relevant ages within the development. Therefore, in highlighting this, the draft Local Plan has not have regard to the feasibility of such development arising in the plan area.
- 5.19. Furthermore, taking account of the advice in the NPPF (paragraph 64), proposals of less than 10 dwellings do not provide affordable housing. These

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<sup>11</sup> <https://tcpa.org.uk/resources/the-20-minute-neighbourhood/>

are both factors in determining the suitability and scale of development sites within the Plan area and the consequential ability to address these matters.

- 5.20. Therefore, in determining the size of sites for allocation and the realism that this would be included in a robust strategy, having regard to the emphasis on both infrastructure and affordable housing within the Plan area, the emerging Plan should concentrate on sites and locations where these can readily be provided.
- 5.21. As noted, development of our client's Site south of Charlton Lane, Clanfield for up to approximately 200 dwellings (including 40% affordable housing) will make significant infrastructure contributions through CIL and other mechanisms which can contribute towards infrastructure in the District, including the measures already identified. Page 37 of the Regulation 18 Consultation asks whether the 40% affordable homes requirement should change. BDWH strongly advice this figure should not increase, as this could affect the viability and deliverability of future schemes, especially given the current and emerging requirements that new housing has/will have to deliver in terms of carbon reduction targets, biodiversity net gains requirements, S106/CIL contributions, alongside mitigating for nutrient neutrality.
- 5.22. The investments identified for Clanfield include improvements in recreational provision such as a pavilion at the Cricket Club.
- 5.23. Since a range of improvements have been identified, it would be appropriate to focus growth in locations like Clanfield where these are listed and could consequently be provided by development.
- 5.24. The BDWH Site in Clanfield can greatly assist in achieving EHDC vision which is set out on page 12 of the Regulation 18 consultation and the Site can contribute and deliver to EHDC strategic objectives.

## **6. Climate Emergency, Sustainability and the Environment**

### **Question CLIM2**

- 6.1. In response to the Regulation 18 consultation question CLIM2, BDWH embraces EHDC's Climate Emergency agenda.
- 6.2. A key aspect of BDW's sustainability framework is driving a reduction in carbon emissions across our homes through innovation and high quality design – including committing to all new house types being zero carbon (regulated energy) by 2030. To enable us to reach this milestone and continue to build zero carbon homes at scale and at a viable cost, we have set out a clear roadmap which includes researching and trialling innovative products and techniques, alongside collaborating in industry research projects, such as the Zed House and Energy House 2.0 respectively.
- 6.3. We strongly suggest to the Council that carbon reduction targets for new housing is in line with the Future Homes Standard.
- 6.4. In terms of the definition of 'net- zero carbon' the Council should follow an industry standard definition and set out where the definition comes from.

### **Question CLIM5**

- 6.5. In relation to question CLIM5, the criteria for tackling climate change needs to be in the emerging East Hampshire Local Plan and not in future NP or design codes as this could create duplicate criteria, leading to different and unequal requirements.

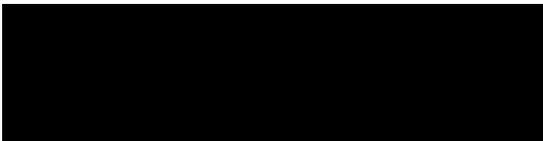
## **7. Summary**

- 7.1 We support the plan-making process, noting the importance of maintaining momentum with the evolving Plan to ensure the strategy for delivering the necessary growth within the District is achieved at the earliest opportunity.

- 7.2 In this regard, it is essential that the emerging Plan is prepared to be consistent with national advice as outlined earlier in this response.
- 7.3 The next stage in the Local Plan process will need to consider the suitability of site-specific allocations for housing in seeking to meet the identified housing need in sustainable locations. This should include a finer grain analysis of the evidence base, including in relation to the Council's Landscape Capacity Study.
- 7.4 For the reasons set out above, the next iteration of the Local Plan should:
- 1 Include the allocation of **land south of Chalton Lane, Clanfield, for up to approximately 200 dwellings.**
  - 2 10,857 dwellings should be met as a minimum during the plan period to 2042 (@ 517dpa), with additional provision to be made to address unmet needs arising from neighbouring authorities.
  - 3 In planning for the unmet needs from neighbouring authorities, the Local Plan should provide for growth at locations to the south of the SDNP that are within the functional relationship of PUSH.
  - 4 The Council's Landscape Capacity Study should be updated to include a finer grained analysis of sites currently assessed within larger land parcels that may include different characteristics.
- 7.5 We trust the above comments are of assistance in producing the Local Plan and await confirmation of receipt of our representations in due course.
- 7.6 Finally, we welcome the opportunity to enter into dialogue with the Council in relation to the preparation of the Local Plan.

Yours faithfully

*Woolf Bond Planning LLP*





## Woolf Bond Planning

Chartered Town Planning Consultants

Our Ref: [REDACTED]

Email: [REDACTED]

16<sup>th</sup> January 2023

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

Response sent by email to [localplan@easthants.gov.uk](mailto:localplan@easthants.gov.uk)

Dear Sirs,

**East Hampshire District Local Plan 2021 to 2040: Issues and Priorities  
(Regulation 18 Part 1 Consultation (Nov 2022-Jan 2023))**

**Representations on behalf of Foreman Homes**

### 1. Introduction

#### General

- 1.1. We refer to the above consultation exercise and respond on behalf of our clients, Foreman Homes ("FH").
- 1.2. FH has a strong belief in the principle of the plan-led system and in setting out our representations upon the Regulation 18 Part 1 Consultation for the East Hampshire District Local Plan 2021-2040, we hope to be able to work with the Council in order to ensure the subsequent Local Plan is fit for purpose in seeking to facilitate sustainable development that can deliver the much needed new homes whilst also securing the provision of supporting infrastructure to ensure the creation of places where people will want to live and work in locations that are truly sustainable.

- 1.3. FH has considerable experience and expertise in dealing with and realising development schemes through the planning system.
- 1.4. In this context, we welcome the Council's preparation of the Local Plan, for which the current consultation is an initial step. The Local Plan should provide a strategy consistent with national policy to deliver the growth that the District and wider area needs.
- 1.5. Our comments have been informed by a review of the background documents which accompany the consultation exercise with the response framed by virtue of the different headings in the overarching Regulation 18 Consultation document.
- 1.6. FH has a controlling interest in **land east of Lovedean Lane, south of Coldhill Lane, Lovedean, which Site we are promoting as a housing allocation for up to approximately 30 dwellings** along with landscaped open space.
- 1.7. The planning policy context and the merits and suitability of the Site as a housing allocation are set out below.

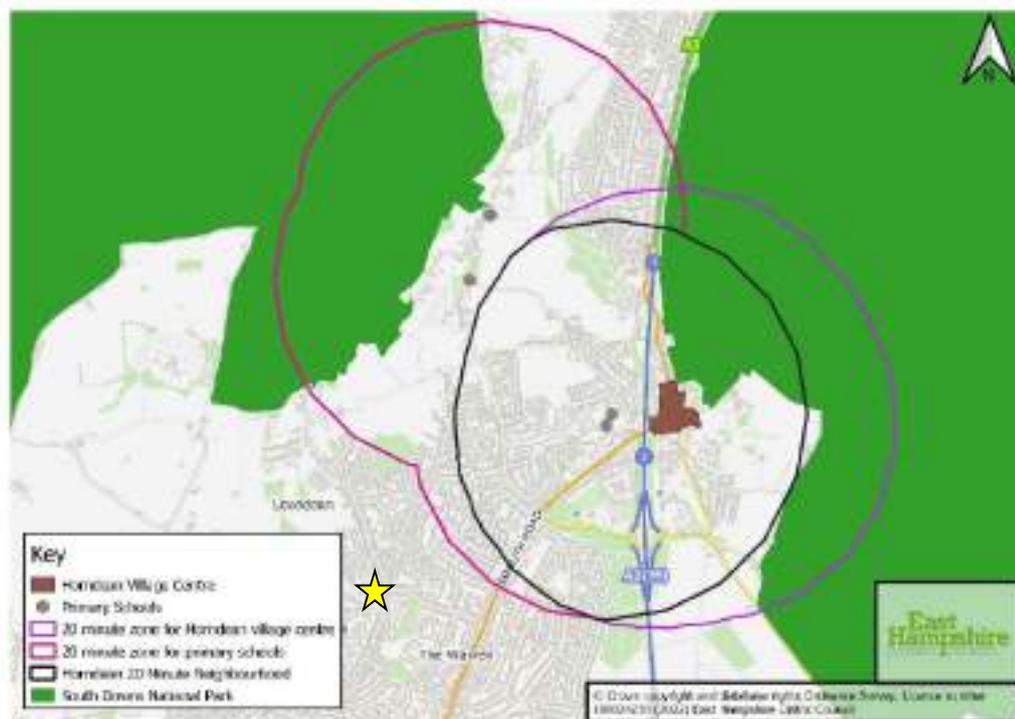
## **2. Deliverable Opportunity for Housing Growth on land east of Lovedean Lane, south of Coldhill Lane, Lovedean**

### **Context**

- 2.1. FH has a controlling interest in the land to the east of Lovedean Lane, south of Coldhill Lane, Lovedean. The Site extends in total to approximately 1.66ha.
- 2.2. The Site has been positively assessed in the Council's Land Availability Assessment ("LAA") as a developable site (Site Ref: LAA/HD-015).
- 2.3. We agree with the LPA's positive assessment of the Site as set out in the LAA, and expand upon its merits as a housing allocation below.

- 2.4. The allocation of the Site for housing can assist in meeting identified housing need in a location that provides access to services and facilities in Cowplain and Horndean.
- 2.5. EHDC's Settlement Hierarchy Background Paper recognises the extensive range of services and facilities available that are accessible within a reasonable distance from Lovedean, accessible by foot, cycle and short car journeys.
- 2.6. The Council's Settlement Hierarchy Background Paper indicates the Site as being located beyond a 20 minute neighbourhood, when drawn from existing services and facilities in East Hampshire. See annotated plan below.

**Map 6: Horndean 20-Minute Neighbourhood Area**



- 2.7. However, the Havant Local Plan indicates that land on Milton Road is a local centre (as illustrated by the yellow star on the annotated plan above). This Milton Road local centre is also within around 250m of Woodcroft Primary School. As our client's Site off Lovedean Lane is within 1,200m of both the Milton Lane local centre and Woodcroft Primary School, it would also be within a 20 minute neighbourhood as defined by the Council, albeit this is based on facilities within neighbouring Havant Borough.

- 2.8. As such, the Site off Lovedean Lane inherently embraces the 20 minute neighbourhood concept, adopting the best principles contained in 'The 20-Minute Neighbourhood' guide produced by the Town and Country Planning Association (TCPA). This also demonstrates that the Site is accessible given there are further facilities located close-by that are not included within the Settlement Hierarchy Background Paper and thus the Site should be considered suitable to support sustainable development.
- 2.9. It is clear that local services and facilities are within walking and cycling distance, which accords with the approach to sustainable development set out in the NPPF.

### **Benefits**

- 2.10. Development of the Site for housing can secure a number of benefits, including as follows:
- Delivery of circa 30 new homes (including policy compliant affordable provision)
  - Aiming for the provision of 10% Biodiversity Net Gain
  - Creation of Green Infrastructure, new planting and hedgerows
  - Provision of off-site enhancements to the network of public footpaths and cycle routes
  - Site is available and delivered by FH who operate locally and provide high quality new homes.

## **3. The Plan Period**

- 3.1. The Regulation 18 – Part 1 consultation document covers the period 2021 to 2040. However, and assuming the timetable in the LDS is achieved with submission in autumn 2024, the examination process could take 18 months; with adoption possibly in late 2026.
- 3.2. Allowing for a minimum 15-year period post-adoption, the Local Plan should cover the period to 2042.
- 3.3. This has consequential implications for the assessment of housing need to be met within the District.

## **4. Population and Housing**

### **The Housing Requirement**

- 4.1. Page 21 onwards of the consultation draft Local Plan explains the derivation of the District's Local Housing Need, which approach includes adjustments to reflect the geographical 'split' between those parts of East Hampshire inside and outside of the South Downs National Park ("SDNP").
- 4.2. Table 5.1 on page 23 of the consultation draft Local Plan identifies a minimum Local Housing Need ("LHN") of 632 dwellings annually from 2022 across the whole of East Hampshire District.
- 4.3. As page 26 explains, the 632dpa figure is to be met by the provision of 517dpa within that part of EHDC excluding the SDNPA, with 115dpa to be met within that part of EHDC within the SDNP.
- 4.4. As such, and for the purpose of this Local Plan, the relevant figure is the 517dpa.
- 4.5. Page 26 also explains, this equates to 9,823 homes. Excluding existing supply (completions, sites with planning permission, existing allocations, and a windfall allowance), the council identifies a need to plan for approximately 3,405 new homes through the emerging Local Plan. This is a minimum requirement.
- 4.6. However, and as set out in section 3 above, the plan period should cover an additional 2 years, which requires land for a further 1,034 dwellings to be identified (2 years x 517dpa). This results in a need to plan for a minimum of 10,857 dwellings.

### **Unmet Housing Need: Duty to Cooperate**

- 4.7. In addition, to the minimum requirement to meet locally derived housing needs, paragraph 61 of the NPPF is clear that consideration of a higher housing requirement figure above the LHN could be factored in, particularly where neighbouring areas have unresolved needs.

- 4.8. That part of the District south of the SDNP is within the Partnership for South Hampshire sub-region.
- 4.9. The ongoing work undertaken by the Partnership highlights that a number of local authorities within it, including the City of Portsmouth together with the Borough of Havant (which adjoins East Hampshire) have unmet housing needs.
- 4.10. It is clear that East Hampshire generally, and specifically the area south of the SDNP, should be explored in detail in relation to its potential to address this unmet need. This further justifies the provision of additional growth in the southern part of EHDC, including the allocation of our client's Site, which Site has been assessed by the Council as being developable.
- 4.11. This wider consideration of the part of the District south of the SDNP should also take account of the acknowledged sustainability of this location for growth when evaluated in a cross-authority manner. This is illustrated by the existing commitment for growth west of Waterlooville within the joint plans of Havant Borough and the City of Winchester District.
- 4.12. As explained below, the clear relationship of the southern parts of East Hampshire District to the significant employment, retail, leisure, cultural and educational opportunities in and around Waterlooville, Havant and Portsmouth would indicate that this is a clear location for sustainability growth, especially taking account the existing public transport services.
- 4.13. Further growth within the vicinity of Waterlooville (including in the southern parts of East Hampshire would reflect this).
- 4.14. The failure of the plan to accommodate additional growth to contribute towards the unresolved needs of the Partnership for South Hampshire (including that arising from the neighbouring authority of Havant Borough) is an indication that the Plan as drafted is inconsistent with National Policy.
- 4.15. Therefore, and having regard to the questions posed by draft Local Plan (question POP4), it is essential that the Council offers to assist in meeting the needs of neighbouring areas within the parts of the district with a clear functional relationship.

4.16. This is illustrated by the clear relationship between the part of the District south of the SDNP and the wider Partnership for South Hampshire.

### **Summary**

4.17. To conclude, the 10,857 dwelling requirement should be met as a minimum during the plan period to 2042 (@ 517dpa), with additional provision to be made to address unmet needs arising from neighbouring authorities.

4.18. In planning for the unmet needs from neighbouring authorities, the Local Plan should provide for growth at locations to the south of the SDNP that are within the functional relationship of PUSH.

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

### **General**

5.1. The draft Local Plan identifies a number of options for delivering growth across the plan area, comprising as follows:

- **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

5.2. Given the clear need for growth in the southern part of the District, both to support the existing communities alongside contributing towards unmet housing needs across the Partnership for South Hampshire area (especially arising in Havant Borough and the City of Portsmouth), a strategy which includes a greater range of growth locations should be selected. As such, **we support a hybrid of options 1 and 2**. This will ensure growth is located at the most sustainable locations.

## 6. Summary

- 6.1. We support the plan-making process, noting the importance of maintaining momentum with the evolving Plan to ensure the strategy for delivering the necessary growth within the District is achieved at the earliest opportunity.
- 6.2. In this regard, it is essential that the emerging Plan is prepared to be consistent with national advice as outlined earlier in this response.
- 6.3. The next stage in the Local Plan process will need to consider the suitability of site-specific allocations for housing in seeking to meet the identified housing need in sustainable locations.
- 6.4. For the reasons set out above, the next iteration of the Local Plan should:
- 1 Include the allocation of **land east of Lovedean Lane, south of Coldhill Lane, Lovdean, for up to approximately 30 dwellings.**
  - 2 10,857 dwellings should be met as a minimum during the plan period to 2042 (@ 517dpa), with additional provision to be made to address unmet needs arising from neighbouring authorities.
  - 3 In planning for the unmet needs from neighbouring authorities, the Local Plan should provide for growth at locations to the south of the SDNP that are within the functional relationship of PUSH.
- 6.5. We trust the above comments are of assistance in producing the Local Plan and await confirmation of receipt of our representations in due course.

Yours faithfully



Enc.

## EHDC Local Plan Comments

Mon 16/01/2023 19:15

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 Sir/Madam

Please find below my comments on the East Hants Local Plan which is currently out for public consultation. I have also submitted a call for sites form, but I wanted to make the Council aware of our land which is available for development and hope that it is considered for development as an allocation in the next Local Plan consultation. I have attached a plan of our land which is located to the rear of 64 Downhouse Road, Catherington.

DEV1 Please rank these options in order of preference

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

It is considered that the approach should concentrate on expanding the existing settlements such as Catherington which are already sustainably located, close to services and facilities.

- a) identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved;
- b) use tools such as area-wide design assessments and Local Development Orders to help bring small and medium sized sites forward;
- c) support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes; and
- d) work with developers to encourage the sub-division of large sites where this could help to speed up the delivery of homes.

Paragraph 69 confirms that at least 10% of housing requirements should be met from sites of 1 hectare or less. This should be delivered through the Local Plan to ensure certainty.

Whilst our land has a scale greater than 1 hectare, it is felt that part of this land could be allocated for development purposes to meet this requirement. It is considered that due to the absence of an appropriate proportion of smaller development sites across the District, the Plan would likely be considered unsound.

### General Consultation Question

2.43 GEN1 How do you feel about this consultation? (Very happy / **Happy** / Neutral / Unhappy / Very unhappy).

2.44 GEN2 Is there anything else you would like to tell us in response to this consultation? (please explain).

**We wish to make you aware of our land which is available for development in the short term and hope it is considered through the Local Plan review for an allocation. It is located in a sustainable location, with Catherington having a settlement policy boundary which part of the site is located within.**

**The majority of the land is located within the Gap Between Settlements, however it does have defined landscape boundaries which prevents views in and out of the land. Part of the site is also located within a conservation area, however a well-designed scheme can take into consideration this constraint.**

Kind regards



**From:** [REDACTED]  
**Sent:** 16 January 2023 19:11  
**To:** EHDC - Local Plan  
**Subject:** EHDC Local Plan Comments  
**Attachments:** [REDACTED]

**Categories:** Consultation Responses

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

Dear Sir/Madam

Please find below my comments on the East Hants Local Plan which is currently out for public consultation. I have also submitted a call for sites form, but I wanted to make the Council aware of our land which is available for development and hope that it is considered for development as an allocation in the next Local Plan consultation. I have attached a plan of our land which is located to the east of Catherington Lane.

DEV1 Please rank these options in order of preference

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

It is considered that the approach should concentrate on expanding the existing settlements such as Catherington which are already sustainably located, close to services and facilities.

- a) identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved;**
- b) use tools such as area-wide design assessments and Local Development Orders to help bring small and medium sized sites forward;**
- c) support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes; and**
- d) work with developers to encourage the sub-division of large sites where this could help to speed up the delivery of homes.**

Paragraph 69 confirms that at least 10% of housing requirements should be met from sites of 1 hectare or less. This should be delivered through the Local Plan to ensure certainty.

Whilst our land has a scale greater than 1 hectare, it is felt that part of this land could be allocated for development purposes to meet this requirement. It is considered that due to the absence of an appropriate proportion of smaller development sites across the District, the Plan would likely be considered unsound.

General Consultation Question

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**We wish to make you aware of our land which is available for development in the short term and hope it is considered through the Local Plan review for an allocation. It is located in a sustainable location, with Catherington having a settlement policy boundary which part of the site is located within.**

**The majority of the land is located within the Gap Between Settlements, however it does have defined landscape boundaries which prevents views in and out of the land. Part of the site is also located within a conservation area, however a well-designed scheme can take into consideration this constraint.**

**I have attached a plan of the land and it is developable for circa 35 houses.**

Kind regards,

**[REDACTED]**

## Local Plan consultation - response on behalf of the owners of land to the east side of Lindford Road, Lindford

Mon 16/01/2023 16:13

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

Cc: [REDACTED]

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

Dear sir/madam,

In respect of the Local Plan consultation, comments set out below (and the accompanying ecological summary note) are focussed on the relative merits of the parcel of land on the eastern side of Lindford Road, Lindford in the context of the strategy for development. A review of the settlement hierarchy in early 2019 resulted in the classification of Lindford as a settlement with a small number of services. Accordingly, it is a settlement that could (and should) accommodate a degree of growth to ensure the strategy meets the housing growth needs of the district through the provision of dispersed housing growth at the majority of settlements across the borough that have defined Limits to Built Development, which applies to Lindford.

**A review of the JCS settlement hierarchy (for areas outside of the South Downs National Park) was undertaken in the summer of 2018. This involved a community facilities audit and desk-based research to score and rank the settlements, taking account of accessibility. A revised settlement hierarchy was proposed and presented in the draft Local Plan consultation of early 2019.**

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

The ecological summary note contains a detailed analysis of the Wealden Heaths Visitor Survey (dated 2018) and data from a survey of the Wealden Heaths Phase II SPA undertaken in 2022 - the below link will navigate the reader to to the corresponding webpage.

<https://www.southdowns.gov.uk/call-to-help-care-for-heaths-as-bird-numbers-soar/>

It is hugely encouraging to learn that bird populations at the Wealden Heaths have grown to numbers not seen for in excess of 25 years.

As the application site is relatively proximate to the Broxhead Common area it is appropriate to draw upon data presented within the 2018 Wealden Heaths visitor survey. Pertinent information is bulleted out below:

- Broxhead Common is the only assessed site where **dog walking is not stated as a reason for a site being selected as a single main reason for visitation by users.**
- In terms of visit frequency, the percentage of daily visitors at Broxhead Common is just 11%
- At Broxhead Common, **visitor footfall was dispersed at a low density across almost the entire site** when compared to other sites
- **Broxhead Common had the smallest overall group size**, with 1.3 people per group (adults and minors).
- The typical number of dogs per group at Broxhead Common is 0.8. Bearing in mind the site has the smallest overall group size and the highest rate of dispersal, **the number of dogs at Broxhead Common is the lowest amongst all sites**
- **Broxhead Common is subject to the shortest visitor dwelling time of the surveyed sites**, with the average visit duration for each visit at 44 minutes
- Within the 2018 visitor survey there is representation of the distribution of the 75% nearest postcodes to provide an indication of each site's 'draw'. These distances were plotted as radius applied to individual sites, visualised in Map 9, for which the below extract is centred on Broxhead Common.
- Analysis of map 9 of the visitor survey confirms that 22 postcodes were reported within the boundary of Lindford Parish area.

The 2021 census records there are a total of 1,101 households within Lindford parish, meaning that **2% of Lindford's households** (i.e.  $22 / 1,101 * 100$ ) interacted with Broxhead Common during the associated period of the 2018 visitor survey, which is negligible. Development of the site for up to 8 dwellings would have a **negligible impact on visitor numbers to the Broxhead Common.**

The response to the Housing Outside Development Limits is enclosed, as this document provides key evidence on the merits of the site to accommodate a self-build or custom-build housing scheme.

The landowners are looking to work proactively with the Planning Policy team as part of the Local Plan review process with a view to the site being allocated for housing.

A pre-application request is to be submitted imminently to Natural England to gauge their views on the corresponding impact of the proposed development on the Wealden Heaths Phase II SPA in accordance with policies CP21 and CP22. Any response received from Natural England shall be shared with EHDC.

Kind regards,

[Redacted signature block]

## response to issues and priorities regulation 18 part 1 consultation on East Hampshire Local Plan 2021 to 2040

Mon 09/01/2023 18:23

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 Local Plans East Hampshire Council:

I am sending this email from [REDACTED] and I am acting as [REDACTED] regarding land at Haslemere Road, Liphook site reference LAA/LIP-011.

These are comments on the issues and priorities document to support the emerging East Hampshire Local Plan Review 2021-2040, which are set out below:

Our comments are based on the section of the borough that is in the north east of the Council area marked on the map on page 29 of the report and refers to the settlement of Liphook and our site that has been given the reference LAA/LIP-011. In earlier correspondence in 2018 call for sites we indicated that the land was available with an area of 1.22 hectares and for approx 35 market houses. Later following a request for the provision of suitable alternative green space ( SANG) a reduction would be made to the built up area of the site to provide a total of 24 housing units of mixed numbers and sizes of units.

We confirmed that this situation remains the same to EHDC email reply on 4th July 2022 relating to a call for sites, and that the site was still available and that we will be pleased to continue to discuss details about the best range of housing uses for the development of the site with you during this on going period of local plan formulation.

We draw attention to the details provided in pages 30 to 36 of the report relating to age profiles and housing needs as observed in an updated HEDNA 2022 report and support those findings. We especially note that on page 31 the increase in population of the over 65's up to 45.5 % of 21246 persons. This has implications for the type of housing that needs to be provided and we suggest that our site might be well suited for provision more specifically for housing for the elderly rather than a general market housing site. We would be pleased to discuss this possibility with you and subject to the results of a more specific housing needs survey, would be pleased to examine the layout and details such a provision might be suitable for this location.

Answers to Questions:

HOU1 A housing needs survey would provide the answers to the specific housing numbers needed and if phrased correctly would result in details showing the different types of

housing that could be provided, such as bungalows, flats and separate retirement homes across the Borough and then specifically that could be most suited for this Liphook location and then this site.

HOU1a Reasons: The reasons are because of this predicated high housing need for this specialist group of over 65's" as provided by HEDNA and which can be reinforced by a separate specific housing needs survey that will be able to explore, numbers, types and suitable locations for any provision.

We also support the details relating to pages 32 and 33 for housing needs of disabled people and answers to the questions are:

HOU3 adaptable housing : YES

HOU 4 ON large sites for % of new homes to be adaptable: YES

Re Pages 33 to 35:

HOU5 Policy for a % of smaller homes on development sites: YES

HOU5a ANSWER 1-2 bed homes

HOU 6 ONLY on larger speculative market sites

Re pages 35 to 36:

HOU 7 40% is realistic so stay the same

HOU8 To stress that both affordable housing and housing for the elderly ( all types) can be viewed as " exceptions sites " and be calculated as in addition to the general housing land supply figures if there is proven need.

We note the development strategy and distribution section on pages 51 to 61 and consider that option 1 dispersed new growth to a wider range of settlements would be appropriate. We support the fact that, as shown on the option 1 plan on page 55, Liphook is marked as a tier 1 settlement deemed suitable to receive new development. It is also so designated under option 2 concentrate new development to the largest settlements.

In conclusion we confirm that we support the location of Liphook as a settlement that should be capable for growth and would be pleased to discuss the role that our client's site at Haslemere Road, Liphook can play in providing housing and perhaps as specialist housing site for the elderly subject to further discussions and research with yourselves.

[Redacted]

[Redacted]

[Redacted]