

## Responses from Statutory Consultees

### East Hampshire Draft Local Plan 2021-2040 Reg18, 2024

	Page number
Basingstoke and Deane Borough Council	2
Chichester District Council	4
Defence Infrastructure Organisation	6
Environment Agency	13
Hampshire and IOW Constabulary	44
Hampshire County Council	46
Hart District Council	90
Havant Borough Council	93
Historic England	96
Integrated Care Board ICB	116
National Gas	129
National Grid	132
National Highways	137
Natural England	140
Network Rail	171
Portsmouth Water	181
South Downs National Park Authority	193
South East Water	217
Southern Water	219
Surrey County Council	225
Thames Water	233
Waverley Borough Council	251
Winchester City Council	254



Basingstoke  
and Deane

Basingstoke and Deane Borough Council

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Planning Policy Team  
East Hampshire District Council  
Penns Place  
Petersfield  
GU13 4EX

4 March 2024

Dear Sir/Madam

**East Hampshire Draft Local Plan 2021 -2040 – Regulation 18 Consultation**

Thank you for consulting Basingstoke and Deane Borough Council (BDBC) on the East Hampshire Regulation 18 Local Plan Update 2021-2040. The opportunity to engage and collaborate on strategic planning matters, policies and cross boundary issues is welcomed.

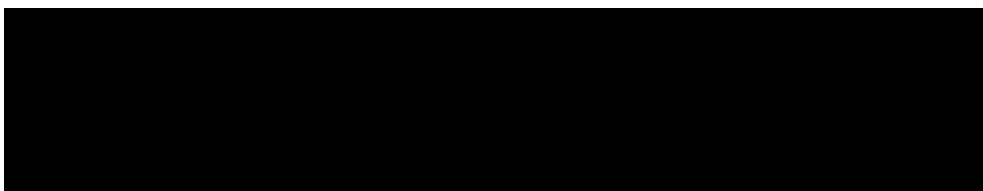
The adopted Basingstoke and Deane Local Plan covers the period 2011 to 2029. We are also currently undertaking public consultation on our Draft Local Plan, which covers the period 2021 to 2040. The consultation period commenced on 22 January and closes on 4 March.

The strategic emphasis in the East Hampshire Draft Plan on designing for carbon neutrality and resilience to future climate change over the plan period and beyond is supported. BDBC has also declared a climate emergency and the overarching theme of countering climate change runs throughout the Local Plan.

It is noted that the plan proposes meeting its housing requirement in full based on the standard method calculations, whilst also making an allowance for unmet needs in the South Downs National Park Authority. As identified in our draft Local Plan, we are also seeking to meet our proposed housing requirement in full.

BDBC raises no objection to the proposed spatial strategy subject to the identified housing need being met by EHDC and SDNPA during the plan period. The opportunity to engage in further discussions about allocations at Alton, particularly in relation to their potential impact on transport corridors such as the A31 and A339 would be welcomed.

It is noted that the Plan proposes to meet its economic needs through the intensification of employment zones and employment site allocations. BDBC provide no objection to the proposed spatial strategy in relation to the distribution and location of employment land allocations, subject



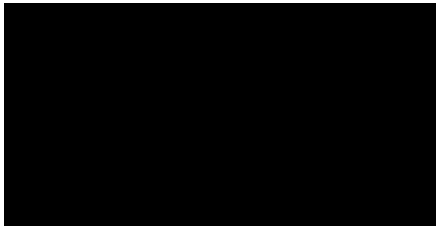
to appropriate mitigation and infrastructure requirements for the proposed sites being secured through the final policy wording.

It is noted that the draft Plan doesn't identify sufficient land to meet the needs of gypsies, travellers and travelling show people and that the approach to meeting these accommodation needs is still subject to further engagement and evidence gathering. As you are already aware, BDBC is not in the position to assist with meeting the need identified, given the current level of need within this borough and the availability of suitable sites to accommodate those needs. We anticipate continued dialogue on this issue through the duty to co-operate as both Plan's progress.

The collaborative working with other local authorities in the Solent Region on seeking to avoid and mitigate the impacts of nutrients from new development, upon the Test, Itchen and sensitive environment of the Solent is supported. We also support the approach set out to work with neighbouring authorities within the Thames Basin Heaths Special Protection Area (SPA) or buffer zones to avoid and/or mitigate impacts on the SPA.

We look forward to continuing our engagement in relation to our respective emerging local plans. Please keep us informed of progress and any areas for collaboration.

Yours sincerely



Planning Policy Manager

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

If calling please ask for:



Our ref:

Your ref:

27 February 2024

Dear Sir/Madam

## **East Hampshire Local Plan 2021 – 2040 Regulation 18: Draft Local Plan**

Thank you for consulting Chichester District Council (CDC) on the draft East Hampshire District Local Plan 2021 – 2040 (EHLP), published in January 2024. This letter sets out our response to the consultation.

CDC notes that:

- the draft EHLP sets out a minimum housing requirement of 9,082 dwellings over the plan period (including an allowance for unmet needs within the South Downs National Park);
- taking account of sources of supply there is a residual requirement of 2,857 dwellings;
- the draft EHLP proposes the allocation of sites for 3,500 dwellings.

It is also noted that at this stage the draft EHLP makes no assumptions on unmet need from other neighbouring authorities. CDC welcomes the statement in paragraph 3.11 that any surplus could be attributed to future identified unmet need, although it is recognised that EHDC would particularly look to neighbouring authorities in the South Hampshire sub-region. This reflects the agreed position on unmet housing need as set out in the January 2024 Statement of Common Ground between CDC and East Hampshire. CDC would welcome further discussion with East Hampshire District Council on this matter.



1/cont.

East Hampshire Local Plan Review – Regulation 18 response

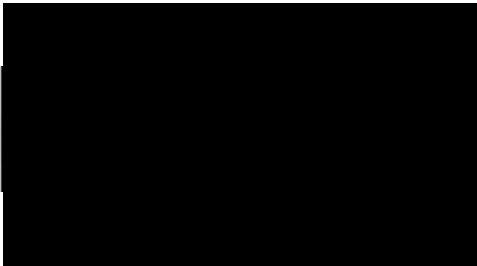
27 February 2024

2

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If you have any queries concerning this letter, please do not hesitate to contact   


Yours sincerely



Divisional Manager Planning Policy




# Defence Infrastructure Organisation



Ministry of Defence  
Safeguarding Department  
DIO Head Office  
St George's House  
DMS Whittington  
Lichfield  
Staffordshire WS14 9PY

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Draft Local Plan 2021-2040 (Regulation 18)  
Our reference:  
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Planning Policy Team  
East Hampshire District Council  
Planning Dept,  
Penns Place  
Hampshire  
GU31 4EX

28<sup>th</sup> February 2024

Dear Sir/Madam

It is understood that East Hampshire District Council are undertaking a revised draft consultation on the Draft Local Plan 2021-2040.

The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the MOD as a statutory consultee in the UK planning system to ensure designated zones around key operational defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites are not adversely affected by development outside the MOD estate. For clarity, this response relates to MOD Safeguarding concerns only and should be read in conjunction with any other submissions that might be provided by other MOD sites or departments.

Paragraph 101 of the National Planning Policy Framework (December 2023) requires that planning policies and decisions take into account defence requirements by '*ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.*' Statutory consultation of the MOD occurs as a result of the provisions of the Town and Country Planning (Safeguarded aerodromes, technical sites and military explosives storage areas) Direction 2002 (DfT/ODPM Circular 01/2003) and the location data and criteria set out on safeguarding maps issued to Local Planning Authorities by the Department for Levelling Up.

The area covered by any East Hampshire District Council Draft Local Plan 2021-2024 will both contain and be washed over by safeguarding zones that are designated to preserve the operation and capability of defence assets and sites (including RAF Odiham, ISS Oakhanger, and Defence Munitions Longmoor).

**Copies of these relevant plans, in both GIS shapefile and .pdf format, can be provided on request through the email address above.**

The review or drafting of planning policy provides an opportunity to better inform developers of the statutory requirement that MOD is consulted on development that triggers the criteria set out on Safeguarding Plans, and the constraints that might be applied to development as a result of the requirement to ensure defence capability and operations are not adversely affected.

To provide an illustration of the various issues that might be fundamental to MOD assessment carried out in response to statutory consultation, a brief summary of the main safeguarding areas of concern is provided below. Depending on the statutory safeguarding zone within which a site allocation or proposed development falls, different considerations will apply.

The airspace above and surrounding aerodromes is safeguarded to ensure that development does not form a physical obstruction to the safe operation of aircraft using that aerodrome. Colour coded zones are marked on safeguarding maps that provide heights which, if proposed development would reach or exceed them, would trigger MOD consultation. These zones also indicate areas where development might reduce the capability or otherwise compromise the operation of technical assets such as communications, navigation, or surveillance systems including radar. In addition to permanent physical development within these zones, the change of use of land to allow/facilitate flying activities; and the use of cranes, piling rigs or other tall plant or equipment to implement development may also be of concern.

Birdstrike safeguarding zones with a radius of 12.87km are designated around certain military aerodromes and marked on safeguarding maps with a heavy dotted line. Aircraft within these zones are most likely to be approaching or departing aerodromes and would be at critical stages of flight. Within these statutory consultation zones the creation or enhancement of environments attractive to those large and flocking bird species that pose a hazard to aviation safety can have a significant effect. This can include:

- the landscaping schemes associated with developments including the provision of green/brown roofs, or roof gardens. This would also include both on and off-site provision of Biodiversity Net Gain (BNG). Where off-site provision is to provide BNG, the locations of both the host development and any other site should both/all be assessed against statutory safeguarding zones and MOD consulted where any element falls within the marked statutory safeguarding zone; and/or
- the creation of new waterbodies such as reservoirs, wetlands, ponds and/or attenuation basins and other elements associated with sustainable drainage systems.

Technical assets that facilitate air traffic management, primarily radar, navigation, and communications systems are safeguarded to limit the impact of development on their capability and operation. The height, massing, and materials used to finish a development may all be factors in assessing the impact of a given scheme. Developments that incorporate renewable energy systems may be of particular concern given their potential to

provide large expanses of metal at height, for example where proposals include a wind turbine or roof mounted solar PV system.

Statutory safeguarding zones are designated around Military explosives storage sites, to ensure that development and land uses will be compatible with MOD capability. Within these zones, where applicable, requirements relating to the siting, design, and construction of buildings, or changes to land use may apply. In principle, the MOD does not object to land in the outer explosives safeguarding zone being developed for residential, commercial, and industrial land use purposes. Any buildings within this zone must be 'non-vulnerable' to blast effects, that is of robust construction, so should an explosive event occur, the structure would not collapse or sustain damage that could cause critical injury to the occupants. Of particular concern within this zone are tall buildings (in excess of 3 storeys), light weight construction and large areas of glazing. The MOD will object to development proposals which support people living, working and congregating within the inner explosives safeguarding zone,

Where development falls outside designated safeguarding zones the MOD may have an interest where development is of a type likely to have any impact on operational capability. Usually this will be by virtue of the scale, height, or other physical property of a development. Examples these types of development include, but are not limited to

- Solar PV development which can impact on the operation and capability of communications and other technical assets by introducing substantial areas of metal or sources of electromagnetic interference. Depending on the location of development, solar panels may also produce glint and glare which can affect aircrew or air traffic controllers.
- Wind turbines may impact on the operation of surveillance systems such as radar where the rotating motion of their blades can degrade and cause interference to the effective operation of these types of installations, potentially resulting in detriment to aviation safety and operational capability. This potential is recognised in the Government's online Planning Practice Guidance which contains, within the Renewable and Low Carbon Energy section, specific guidance that both developers and Local Planning Authorities should consult the MOD where a proposed turbine has a tip height of, or exceeding 11m, and/or has a rotor diameter of, or exceeding 2m;
- Any development that would exceed a height of 50m above ground level. Both tall (of or exceeding a height of 50m above ground level) structures and wind turbine development introduce physical obstacles to low flying aircraft; and
- Any development, including changes of use and regardless of height, outside MOD safeguarding zones but in the vicinity of military training estate or property.

The proposed draft Policy NBE3 - Nature recovery identifies that "Development will only be permitted where a measurable BNG of at least 10% is demonstrated and secured in perpetuity (for at least 30 years) subject to c. The submission of a 30 year management plan detailing how the post-development biodiversity values of the site and any supporting off-site mitigation will be achieved and funded over the time period; and d. The location of any off-site habitats created are within areas which maximise opportunities for local nature recovery wherever this is possible".



The MOD request that; when drafting policy and guidance which addresses biodiversity, ecology, habitat mitigation and Biodiversity Net Gain; the Council bear in mind that some forms of environmental improvement or enhancement may not be compatible with aviation safety. Where off-site provision is to provide BNG, the locations of both the host development and any other site should both/all be assessed against statutory safeguarding zones and the MOD should be consulted where any element falls within the marked statutory safeguarding zone.

The MOD welcome proposed draft Policy CLIM4 – “Proposals for renewable energy schemes, including ancillary development, will be under a presumption in favour of permission where the direct, indirect, individual, and cumulative impacts on the following considerations are, or will be made, acceptable. This means that: b. aeronautical and other military considerations have been satisfactorily addressed.

The MOD has, in principle, no objection to any renewable energy development, though some infrastructure enabling renewable energy production, for example wind turbine generators or solar photo voltaic panels can, by virtue of their physical dimensions and properties, impact upon military aviation activities, cause obstruction to protected critical airspace surrounding military aerodromes, or impede the operation of safeguarded defence technical installations. In addition, where turbines are erected in line of sight to defence radars and other types of defence technical installations, the rotating motion of their blades can degrade and cause interference to the effective operation of these types of installations potentially resulting in detriment to aviation safety and operational capability. The MOD request that the wording of the draft policy is broadened to inform developers that only those applications for development which would not compromise, restrict or otherwise degrade the operational capability of safeguarded MOD sites and/or assets will be supported.

**Within any new Local Plan, policies and the reasoned justification supporting them should, ideally, refer to the presence of safeguarding zones and/or provide a developer with an indication as to potential limitations that might apply to certain development types. In order to provide a broader representation of MOD interests, and to ensure prospective developers are aware of the implications of developing within an area containing MOD safeguarded zones, it is requested that the Regulation 19 East Hampshire District Council’s Local Plan 2021-2040 contains policy wording that makes clear that only those applications for development which would not compromise, restrict or otherwise degrade the operational capability of safeguarded MOD sites and/or assets will be supported.**

A number of the sites allocated in the Joint Local Plan Preferred Options document fall within statutory safeguarding zones. For your convenience, please find a table at Appendix A which provides a summary of the safeguarding criteria that would apply to those potential development sites identified. MOD recommend that any more detailed policies for these sites include wording which indicates that development should be designed to ensure that it would have no impact on the operation or capability of defence sites or assets. The table below provides a summary of those sites and the triggers for statutory safeguarding consultation that would apply:

I trust this clearly explains our position on this update. Please do not hesitate to contact me should you wish to consider these points further.

Yours sincerely



DIO Assistant Safeguarding Manager

**Appendix A**

POLICY REFERENCE/POTENTIAL DEVELOPMENT SITE	SAFEGUARDING ZONE(S) AFFECTED	DEVELOPMENT TRIGGERING STATUTORY SAFEGUARDING CRITERIA
ALT1	RAF Odiham (height and birdstrike safeguarding zones)	<ul style="list-style-type: none"> <li>• Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement.</li> <li>• Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily</li> </ul>
ALT2	RAF Odiham (height and birdstrike safeguarding zones)	<ul style="list-style-type: none"> <li>• Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement.</li> <li>• Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily</li> </ul>
ALT3	RAF Odiham (height and birdstrike safeguarding zones)	<ul style="list-style-type: none"> <li>• Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement.</li> <li>• Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily</li> </ul>
ALT4	RAF Odiham (height and birdstrike safeguarding zones)	<ul style="list-style-type: none"> <li>• Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement.</li> <li>• Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily</li> </ul>
ALT5	RAF Odiham (height and birdstrike safeguarding zones)	<ul style="list-style-type: none"> <li>• Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement.</li> <li>• Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily</li> </ul>
ALT6	RAF Odiham (height and birdstrike safeguarding zones)	<ul style="list-style-type: none"> <li>• Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement,</li> <li>• Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including</li> </ul>

		the potential for an environment attractive to hazardous bird species to be formed temporarily.
ALT7	RAF Odiham (height and birdstrike safeguarding zones)	<ul style="list-style-type: none"> <li>• Development of, or exceeding, 15.2m in height above ground level will trigger statutory consultation requirement.</li> <li>• Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily.</li> </ul>
ALT8	RAF Odiham (height and birdstrike safeguarding zones)	<ul style="list-style-type: none"> <li>• Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement,</li> <li>• Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily</li> </ul>
W&B1	RAF Odiham (height safeguarding zone)	<ul style="list-style-type: none"> <li>• Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement.</li> </ul>
W&B2	RAF Odiham (height safeguarding zone)	<ul style="list-style-type: none"> <li>• Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement.</li> </ul>
W&B3	RAF Odiham (height safeguarding zone)	<ul style="list-style-type: none"> <li>• Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement.</li> </ul>
W&B4	RAF Odiham (height safeguarding zone)	<ul style="list-style-type: none"> <li>• Development of, or exceeding, 15.2m in height above ground level will trigger statutory consultation requirement.</li> </ul>
W&B5	RAF Odiham (height safeguarding zone))	<ul style="list-style-type: none"> <li>• Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement</li> </ul>
W&B6	RAF Odiham (height safeguarding zone)	<ul style="list-style-type: none"> <li>• Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement.</li> </ul>
W&B7	RAF Odiham (height safeguarding zone)	<ul style="list-style-type: none"> <li>• Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement.</li> </ul>
W&B8	RAF Odiham (height safeguarding zone)	<ul style="list-style-type: none"> <li>• Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement.</li> </ul>
BEN1	RAF Odiham (height and birdstrike safeguarding zones)	<ul style="list-style-type: none"> <li>• Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement.</li> <li>• Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily.</li> </ul>
BWH1	RAF Odiham (height and birdstrike safeguarding zones)	<ul style="list-style-type: none"> <li>• Development of, or exceeding, 45.7m in height above ground level will trigger statutory consultation requirement.</li> <li>• Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily.</li> </ul>
BWH2	RAF Odiham (height and birdstrike safeguarding zones)	<ul style="list-style-type: none"> <li>• Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement.</li> </ul>

		<ul style="list-style-type: none"> <li>• Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily.</li> </ul>
MSD1	RAF Odiham (height and birdstrike safeguarding zones)	<ul style="list-style-type: none"> <li>• Development of, or exceeding, 45.7m in height above ground level will trigger statutory consultation requirement.</li> <li>• Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily</li> </ul>
HOP1	RAF Odiham (height and birdstrike safeguarding zones)	<ul style="list-style-type: none"> <li>• Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement.</li> <li>• Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily</li> </ul>

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

8 March 2024

Dear Planning Policy team,

**Consultation on the Draft Local Plan (2021 – 2040) (Regulation 18)**

Thank you for consulting the Environment Agency on the Draft Local Plan (2021 – 2040) (Regulation 18 consultation).

Please find our comments set out below. Please note that there is also a section with our comments on the Strategic Flood Risk Assessment, which forms part of the evidence base for the draft Local Plan.

**Part 1: General comments**

**Nature Recovery**

East Hampshire's unique character and environmental assets are heavily dependent on its vibrant network of rivers, including the iconic chalk streams (River Meon, Lavant, North Wey and Ems) and their floodplains. We are concerned that the current draft Local Plan, despite its comprehensive nature, fails to adequately address the protection and enhancement of these vital resources.

While the document spans 328 pages, the word "river" appears only six times. This starkly reflects the negligible consideration given to riverine ecosystems and their multifaceted value. This gap is further evident in the proposed site allocations, which include concerning developments near chalk streams and floodplains, potentially compromising their ecological integrity and flood defence capabilities.

We urge the council to prioritise river health (some of the district's rivers are deteriorating under the Water Framework Directive) and collaborate with us to establish robust policies and strategies. As currently written, we believe the plan is not consistent with the National Planning Policy Framework, paragraphs 180 and 185.

However, to address this we propose the inclusion of a dedicated "Protection and Enhancement of Watercourses Policy" within the Local Plan (see our comments on the 'Water Environment' section of the Plan below). This policy offers concrete measures to address the identified concerns and ensure sustainable development practices function alongside river protection. We also feel there is sufficient justification and a need to ensure sites are deliverable for site specific policies, which will ensure that development coming forward make a positive contribution to nature recovery across the district.

We believe that a collaborative approach, informed by sound data and expertise, is crucial to ensure the health and resilience of East Hampshire's rivers. We are committed to working alongside the council and other stakeholders to achieve this shared goal. We urge you to seriously consider our concerns and engage in dialogue to find effective solutions for safeguarding these irreplaceable natural assets.

## **Part 2: Comments on specific policies & sections**

### **Policy NBE3: Biodiversity Net Gain**

It is recommended that the requirement to achieve a net gain on all elements of the biodiversity metric, i.e. area habitats, watercourse, and hedgerows, is specifically stated in the supporting paragraphs of this policy. We are seeing planning applications where the watercourse metric has not been completed. This is often due to a misunderstanding of when the watercourse metric is required. Where the riparian zone (measured 10 metres from the bank top) is within the project boundary, the watercourse metric is required as part of the biodiversity net gain assessment, particularly relevant to some of the sites you are proposing to bring forward.

### **Water Environment (5.46 to 5.50)**

As currently written, we do not believe this section of the plan goes far enough and is not consistent with section 15 of the NPPF 'Conserving and enhancing the natural environment'.

This section of the plan could be strengthened further to bring it in line with NPPF para 185 which states that:

*'To protect and enhance biodiversity and geodiversity, plans should:*

- a) Identify, map and safeguard components of Local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and Local partnerships for habitat management, enhancement, restoration or creation; and*
- b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity'.*

The importance of the watercourse network within the district should be mapped, and safeguarded. The district contains many headwaters, which are priority rivers. Furthermore, the North Wey in the north of the district and the River Ems and Lavant Stream in the south of the district are designated chalk rivers. Chalk rivers are unique habitats supporting diverse aquatic life and provide ecosystem services by filtering and purifying water. Only 200 chalk rivers are known globally, and 85% of these are in the UK.

It is essential that these watercourses are protected.

We request that a specific policy is included for protecting the district's watercourses. To help facilitate this we offer some wording and justification below:

### **PROPOSED NEW POLICY**

#### **Protection and Enhancement of Watercourses**

##### **Protecting watercourse functions and setting:**

1. Development proposals adjacent to or containing a watercourse must demonstrate that they will not have an adverse impact on the hydrological, ecological, and geomorphological functions of the watercourse and its associated corridor. This includes ensuring no net loss of biodiversity, maintenance of natural flow regimes, and minimisation of bank erosion.

##### **Enhancing watercourse value:**

2. Development proposals should actively seek to enhance the biodiversity, landscape, and recreational value of the watercourse and its corridor through good design principles, such as naturalisation of banks, creation of wetland features, and provision of public access where appropriate.

##### **De-culverting and buffer zones:**

3. De-culverting existing watercourses will be prioritised where feasible. No new culverting will be permitted, and proposals should not prejudice future opportunities for de-culverting.
4. Development proposals adjacent to or containing a watercourse must provide or retain a buffer zone with a minimum width of 10 metres between the top of the bank and the development. This buffer zone should be managed for long-term ecological benefit and include measures to allow for natural movement of fish where barriers exist.

##### **Compliance and Guidance:**

5. Proposals must demonstrate compliance with the Water Framework Directive, relevant River Basin Management Plans, and Local catchment management plans. Developers must follow guidance from the Environment Agency on flood risk management and take all necessary steps to avoid downstream impacts on water quality.

*Justification for this new policy:*

1. East Hampshire's diverse watercourses, including the headwaters of the North Wey chalk river and the Lavant Stream and River Ems, are irreplaceable ecological assets with unique biodiversity and ecosystem services. Chalk rivers are unique habitats supporting diverse aquatic life and provide ecosystem services by filtering and purifying water. Only 200 chalk rivers are known globally, and 85% of these are in the UK. Protecting these watercourses is essential for the health of the Local environment and the well-being of communities.
2. Culverting of watercourses has detrimental consequences for ecology, flood risk, geomorphology, human safety, and aesthetics. Maintaining continuous watercourse corridors maximises their benefits and ensures long-term sustainability.
3. The land adjacent to rivers provides an ecological buffer zone, and along with the river provides an important and effective part of a network of linked habitat corridors to allow the movement of species between suitable habitats. Buffer zones form a vital part of green infrastructure provision and are required for the following purposes:
  - i. To provide a wildlife corridor that links a number of habitats and affording species a wider and therefore more robust and sustainable range of linked habitats.
  - ii. To allow the watercourse to undergo natural processes of erosion and deposition, and associated changes in alignment and bank profile, without the need for artificial bank protection works and the associated destruction of natural bank habitat.
  - iii. To provide for the terrestrial life stages of aquatic insects, for nesting of water-related bird species, and for bank dwelling small mammals.
  - iv. To allow for the maintenance of a zone of natural character with vegetation that gives rise to a range of conditions of light and shade in the watercourse itself.
  - v. To allow, where appropriate, for the regrading of banks to a lower and safer profile, in areas where there is public access.
  - vi. To prevent overshadowing of watercourses by buildings.
  - vii. To reduce the risk of accidental pollution from run-off.

**Policy NBE7: Managing Flood Risk**

It is good to see reference to Natural Flood Management (NFM) in section NBE7.4 of this policy. However, the term is not specifically mentioned. This section could reference the well-established terms “Natural Flood Management” and “Nature Based Solutions” which bring multiple benefits alongside reducing flood risk. The terms “Natural Flood Management” and “Nature Based Solutions” are well established terms and would provide clear guidance to developers for finding resources and best practice. We suggest



the following sentence be included: “This includes encouraging the use of Natural Flood Management (NFM) solutions and Nature-Based Solutions (NBS) within SuDS features.”

### **Policy NBE8: Water Quality, Supply and Efficiency**

This policy could promote the use of Natural Flood Management /Nature Based Solutions for flood management, water quality improvement, and habitat creation.

### **Policy NBE9: Water Quality Impact on the Solent International Sites**

This solely addresses nitrogen and phosphorus pollution from wastewater but ignores other potential impacts commercial development can have on the Solent, such as increased surface runoff, pollution from car parks, and waste management challenges. Exempting entire development categories can create disincentives for sustainable practices within them, potentially leading to an overall increase in environmental impact from commercial developments compared to housing. We would advise that the policy is expanded to address water quality impacts from all development activity to protect international habitat designations.

### **Policy NBE12: Green and Blue Infrastructure**

The policy fails to address rivers, which are a critical part of GBI and can be vulnerable to development pressure. Consequently, there is no guidance on how rivers should be protected and restored. Please see suggestion for a river policy above. These policies should cross-reference each other.

### **Policy NBE13: Protection of Natural Resources**

Whilst this policy seeks to protect Natural Resources, we have identified a number of sites which fall within the Principal Aquifer and Source Protection Zone 1.

Given the number of sites which have sensitive groundwater resources and have historic land contamination, we feel there is sufficient justification to have a policy solely related to groundwater and contaminated land. In addition, we would be seeking site specific policies address these issues where relevant. We have given more detail regarding each site in **Appendix 1**.

As it currently stands policy NBE13 doesn't go far enough and is not consistent with NPPF which states:

*‘Ground conditions and pollution 189.*

*Planning policies and decisions should ensure that:*

*a) a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination. This includes risks arising from natural hazards or former activities such as mining, and any proposals for mitigation including land remediation (as well as potential impacts on the natural environment arising from that remediation);*

b) after remediation, as a minimum, land should not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990; and

c) adequate site investigation information, prepared by a competent person, is available to inform these assessments.

190. Where a site is affected by contamination or land stability issues, responsibility for securing a safe development rest with the developer and/or landowner’.

### **Part 3: Comments on the Strategic Flood Risk Assessment (SFRA)**

#### Sequential Test

It would be useful if on the Sequential Test spreadsheet showed which sites are being taken forward.

#### Level 2 SFRA

The SFRA Level 2 (Strategic Flood Risk Assessment (SFRA) Level 2 – Exception Tests) dated November 2023 assesses the following sites:

- LAA reference AL005 - Brick Kiln Lane, Alton (residential)
- LAA reference WHI020 - Land at former Bordon Garrison, Whitehill & Bordon (mixed use including residential)
- WOR004 - Wilsom Road, Alton (employment)

#### Brick Lane (AL005) and Land at former Bordon Garrison, Whitehill & Bordon (WHI020)

The SFRA explains that these two allocation sites have parts of the sites shown to have surface water overland flow paths and part of the site to have potential for groundwater flooding to occur at surface. Hampshire County Council (HCC) as the Lead Local Flood Authority must be consulted in this regard and satisfied that surface water can be managed effectively.

#### Wilsom Road (WOR004)

The river Wey runs through the site, and Flood Zone 3 is shown across a considerable area of the site. The site is shown to be prone to surface water Flooding and there is potential for groundwater to appear at the surface. The SFRA concludes the Exceptions Test is not applicable. It states ‘As the proposal is for employment use only it is defined as a ‘less vulnerable’ development in the Government’s PPG - Flood Risk and Coastal Change, Table 2. Table 2 sets out that provided no development is proposed in Flood Zone 3b an Exception Test is not required, no development is proposed in Flood Zone 3b.’

We disagree with the above statement and consider that the Exceptions Test has not been passed. We have concerns around the deliverability of this site for the following reasons:

- No detailed Flood modelling is available for this site. The Level 1 SFRA sets out where no detailed modelling is available, Flood Zone 3 should be used as a precautionary approach to define the extent of the functional Floodplain (Flood Zone 3b). Therefore,

this site should be considered functional Floodplain (FZ3b). To establish the extent of the functional Floodplain, Flood modelling would need to be undertaken.

- The latest version (August 2022) of the Planning Practice Guidance (PPG) for Flood risk and coastal change, advises the return period for functional Floodplain as 3.3%. The Level 1 SFRA from 2021 defines the functional Floodplain as a 5% return period. Consideration should be made to the new return period (3.3%) for defining the functional Floodplain. This will inform the Local plan but will also influence future planning applications where proposals come forward in the Floodplain.
- The PPG for Flood risk and Coastal Change now advises *‘Where Flood storage from any source of Flooding is to be lost as a result of development, on-site level-for-level compensatory storage, accounting for the predicted impacts of climate change over the lifetime of the development, should be provided.’* Also, that *‘Whilst the use of stilts and voids below buildings may be an appropriate approach to mitigating Flood risk to the buildings themselves, such techniques should not normally be relied upon for compensating for any loss of Floodplain storage.’*

The Level 2 SFRA needs to consider all sources of Flood risk and whether there is sufficient space on site for built development and space to provide mitigation options e.g. level for level Floodplain compensation.

- Currently the Level 2 SFRA does not consider climate change. The extent of risk may be larger than shown in the Flood Map for Planning. If detailed modelling is being undertaken to establish the functional Floodplain, assessing the 1% annual probability Flood with an allowance for climate change will inform whether there is sufficient space without increasing Flood risk elsewhere and be safe.
- Paragraph 167 of the National Planning Practice Framework states *‘All plans should apply a sequential, risk-based approach to the location of development – taking into account all sources of Flood risk and the current and future impacts of climate change – so as to avoid, where possible, Flood risk to people and property. They should do this, and manage any residual risk, by: a) applying the sequential test and then, if necessary, the exception test...’*

We hope you have found these comments to be helpful and should you wish to discuss any of these points in further detail then please do not hesitate to contact me.

Many thanks,



**Appendix 1 - Specific comments on Chapter 12 Site Specific Allocations**

Site Allocations	Page	Proposed Number of Homes	Env Constraints
<b>Alton (including Holybourne)</b>			
1. ALT1 – Land at Brick Kiln Lane	336 SU7034439199	150	<p><b>Flood zone 3, main river, defences (EA maintained and 3<sup>rd</sup> party maintained), source protection zone 3, principal aquifer, history of land contamination, surface water /and or groundwater flooding.</b></p> <p><b>Nature recovery</b> - We have significant concerns about the proposed housing development at this site. This site is located at the headwaters of the North Wey, a designated chalk stream and a priority habitat with high ecological value.</p> <p>Chalk streams are rare and irreplaceable ecosystems highly susceptible to pollution and changes in water flow. Development at the headwaters can have a significant downstream impact on water quality, habitat integrity, and biodiversity. This is particularly concerning given our ongoing restoration efforts with the Surrey Wildlife Trust, Local community groups, and Alton Town Council, for example at Alton Flood Meadows, Riverside Walk, Molson Coors Brewery and King's Pond.</p> <p>We are concerned that the proposed development could:</p> <ul style="list-style-type: none"> <li>- Increase sedimentation and nutrient pollution, harming sensitive aquatic life.</li> <li>- Alter water flow patterns, impacting spawning and migration of fish and invertebrates.</li> <li>- Fragment important habitats and disrupt ecological connectivity.</li> </ul> <p>We are also open to collaborating to explore options for minimising the impact on the chalk stream at this specific location, such as:</p>

		<ul style="list-style-type: none"> <li>- Reducing the size or density of the development.</li> <li>- Implementing strict construction and stormwater management practices.</li> <li>- Creating significant buffer zones and incorporating green infrastructure solutions.</li> </ul> <p>We remain committed to working collaboratively with the council to find sustainable development solutions that respect and protect our precious environmental assets. We believe a responsible approach can achieve both development needs and environmental protection.</p> <p><b>Contamination</b> - This site/or the vicinity of has a history of historic land contamination. To ensure that the planned development, located over principal/secondary aquifer A and doesn't pose unacceptable risks to the water environment, a <b>site-specific policy</b> should ensure that a contamination investigation along with a remediation strategy and verification process is included.</p> <p><b>Flood Risk</b> – Notwithstanding our comments regarding the SFRA we recommend a <b>Site-Specific policy</b> which sets out the requirement for a Flood Risk Assessment which demonstrates that the development will be safe for its lifetime taking account of the vulnerability of its uses, without increasing Flood risk elsewhere, and, where possible, will reduce Flood risk overall. We also recommend all development avoids Flood Zones 2 &amp; 3 that includes climate change allowances for the lifetime of the development, with a policy of a suitable buffer zone. It is good to see policy of a buffer zone, however, we recommend a value is given to this proposed buffer zone, such as 10 metres or more to ensure structural integrity of the watercourse and access requirements are maintained which will both ensure Flood risk is not increased. The value given should be specific to the site and justified by site specific reasons.</p> <p><b>Surface water /and or Groundwater Flooding</b> - We would refer you to Hampshire County Council as the Lead Local Flood Authority for comment on Flood risk associated with Surface Water and Groundwater at this site.</p>
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<p>2. ALT2 – Chawton Park Surgery</p>	<p>343 SU7077338410</p>	<p>Health</p>	<p><b>Source protection zones 2 and 3, principal aquifer, history of land contamination, surface water /and or groundwater flooding.</b></p> <p><b>Contamination</b> - This site/or the vicinity of has a history of historic land contamination. To ensure that the planned development, located over principal/secondary aquifer A and doesn't pose unacceptable risks to the water environment, a <b>site-specific policy</b> should ensure that a contamination investigation along with a remediation strategy and verification process is included.</p> <p><b>Surface water /and or Groundwater Flooding</b> - We would refer you to Hampshire County Council as the Lead Local Flood Authority for comment on Flood risk associated with Surface Water and Groundwater at this site.</p>
<p>3. ALT3 – Land Adjacent to Alton Sewage Treatment Works, Alton</p>	<p>345 SU7311439612</p>	<p>Employment</p>	<p><b>Principal aquifer, next to sewage treatment works, history of land contamination, Surface water /and or groundwater flooding.</b></p> <p><b>Contamination</b> - This site/or the vicinity of has a history of historic land contamination. To ensure that the planned development, located over principal/secondary aquifer A and doesn't pose unacceptable risks to the water environment, a <b>site-specific policy</b> should ensure that a contamination investigation along with a remediation strategy and verification process is included.</p> <p><b>Surface water /and or Groundwater Flooding</b> - We would refer you to Hampshire County Council as the Lead Local Flood Authority for comment on Flood risk associated with Surface Water and Groundwater at this site.</p>
<p>4. ALT4 – Land at Whitedown Lane, Alton</p>	<p>347 SU7034438786</p>	<p>90</p>	<p><b>Source protection zone 3, secondary aquifer, surface water /and or groundwater flooding.</b></p> <p><b>Surface water /and or Groundwater Flooding</b> - We would refer you to Hampshire County Council as the Lead Local Flood Authority for comment on Flood risk associated with Surface Water and Groundwater at this site.</p>

<p>5. ALT5 – Land at Travis Perkins (Mounters Lodge Part)</p>	<p>350 SU7095138101</p>	<p>24</p>	<p><b>Principal aquifer, history of land contamination, surface water /and or groundwater flooding.</b></p> <p><b>Contamination</b> - This site/or the vicinity of has a history of historic land contamination. To ensure that the planned development, located over principal/secondary aquifer A and doesn't pose unacceptable risks to the water environment, a <b>site-specific policy</b> should ensure that a contamination investigation along with a remediation strategy and verification process is included.</p> <p><b>Surface water /and or Groundwater Flooding</b> - We would refer you to Hampshire County Council as the Lead Local Flood Authority for comment on Flood risk associated with Surface Water and Groundwater at this site.</p>
<p>6. ALT6 – Land at Wilsom Rd, Alton</p>	<p>351 SU7283539041</p>	<p>Employment</p>	<p><b>Flood zones 2 and 3, main river defences (EA maintained and 3<sup>rd</sup> party maintained), principal aquifer, surface water /and or groundwater flooding.</b></p> <p><b>Nature Recovery</b> - The description fails to identify the Caker Stream which flows through the middle of the site. <b>A site-specific policy</b> should require a large undeveloped buffer zone of at least 10-metres to both sides of the watercourse. We would like to see a commitment to the restoration of the Caker Stream as part of any development and we would welcome discussions with the council in this regard.</p> <p><b>Flood risk</b> - There is evidence of historical flooding at this site.</p> <p>Notwithstanding our comments regarding the SFRA we recommend a <b>Site-Specific policy</b> which sets out the requirement included for a site-specific Flood Risk Assessment which demonstrates that the development will be safe for its lifetime taking account of the vulnerability of its uses, without increasing Flood risk elsewhere, and, where possible, will reduce Flood risk overall. We also recommend all development avoids Flood Zones 2 &amp; 3 that includes</p>

			<p>climate change allowances for the lifetime of the development, with a policy of a suitable buffer zone.</p> <p>It is good to see policy of a buffer zone, however, we recommend a value is given to this proposed buffer zone, such as 10 metres or more to ensure structural integrity of the watercourse and access requirements are maintained which will both ensure Flood risk is not increased. The value given should be specific to the site and justified by site specific reasons. In seeking to allocate a specific type of development or land use, planning authorities should apply the Sequential Test to demonstrate that there are no available, appropriate sites in areas with less risk of Flooding. Flood plain storage compensation will be required if development is proposed within the Flood Zones.</p> <p><b>Surface water /and or Groundwater Flooding</b> - We would refer you to Hampshire County Council as the Lead Local Flood Authority for comment on Flood risk associated with Surface Water and Groundwater at this site.</p>
7. ALT7 – Land at Lynch Hill, Alton	355 SU7327040047	Employment	<p><b>Flood zone 2 (only just inside red line boundary) surface water /and or groundwater flooding.</b></p> <p><b>Flood Risk</b> - There is evidence of historical Flooding at this site.</p> <p>Notwithstanding our comments regarding the SFRA we recommend a <b>Site-Specific policy</b> which sets out the requirement for a Flood Risk Assessment which demonstrates that the development will be safe for its lifetime taking account of the vulnerability of its uses, without increasing Flood risk elsewhere, and, where possible, will reduce Flood risk overall. We also recommend all development avoids Flood Zones 2 &amp; 3 that includes climate change allowances for the lifetime of the development, with a policy of a suitable buffer zone. It is good to see policy of a buffer zone, however, we recommend a value is given to this proposed buffer zone, such as 10 metres or more to ensure structural integrity of the watercourse and access requirements are maintained which will both ensure Flood risk is not</p>



			<p>increased. The value given should be specific to the site and justified by site specific reasons.</p> <p><b>Surface water /and or Groundwater Flooding</b> - We would refer you to Hampshire County Council as the Lead Local Flood Authority for comment on Flood risk associated with Surface Water and Groundwater at this site.</p>
8. ALT8 – Land at Neatham Manor Farm, Alton	358 SU7376440000	1000	<p><b>Principal aquifer, surface water /and or groundwater flooding.</b></p> <p><b>Surface water /and or Groundwater Flooding</b> - We would refer you to Hampshire County Council as the Lead Local Flood Authority for comment on Flood risk associated with Surface Water and Groundwater at this site.</p>
<b>Whitehill and Bordon (Including Linford)</b>			
9. W&B1 - Whitehill and Bordon Town Centre	372 SU7953235587	317 (mixed use)	<p><b>Principal aquifer, history of land contamination, surface water /and or groundwater flooding.</b></p> <p><b>Contamination</b> - This site/or the vicinity of has a history of historic land contamination. To ensure that the planned development, located over principal/secondary aquifer A and doesn't pose unacceptable risks to the water environment, a <b>site-specific policy</b> should ensure that a contamination investigation along with a remediation strategy and verification process is included.</p> <p><b>Surface water /and or Groundwater Flooding</b> - We would refer you to Hampshire County Council as the Lead Local Flood Authority for comment on Flood risk associated with Surface Water and Groundwater at this site.</p>
10. W&B2 – Land at former Bordon Garrison	374 SU7892435850	115	<p><b>Main River, Principal aquifer, history of land contamination, surface water /and or groundwater flooding.</b></p> <p><b>Nature Recovery</b> - This entry fails to identify the Oxney Moss as a sensitive ecological receptor and constraint. The Oxney Moss borders the east of the site, a <b>site-specific policy should</b> require a 10-metre ecological buffer zone to protect the river. We would like to see a commitment to the restoration of</p>

			<p>the Oxney Moss as part of any new permissions and we would welcome discussions with the council in this regard.</p> <p><b>Contamination</b> - This site/or the vicinity of has a history of historic land contamination. To ensure that the planned development, located over principal/secondary aquifer A and doesn't pose unacceptable risks to the water environment, a <b>site-specific policy</b> should ensure that a contamination investigation along with a remediation strategy and verification process is included.</p> <p><b>Surface water /and or Groundwater Flooding</b> - We would refer you to Hampshire County Council as the Lead Local Flood Authority for comment on Flood risk associated with Surface Water and Groundwater at this site.</p>
11. W&B3 – BOSC residential expansion	376 SU7882436585	38	<p><b>Principal aquifer, history of land contamination.</b></p> <p><b>Contamination</b> - This site/or the vicinity of has a history of historic land contamination. To ensure that the planned development, located over principal/secondary aquifer A and doesn't pose unacceptable risks to the water environment, a <b>site-specific policy</b> should ensure that a contamination investigation along with a remediation strategy and verification process is included.</p>
12. W&B4 – Louisburg Residential Extension	378 SU7928836650	27	<p><b>Principal aquifer, history of land contamination, surface water /and or groundwater flooding.</b></p> <p><b>Contamination</b> - This site/or the vicinity of has a history of historic land contamination. To ensure that the planned development, located over principal/secondary aquifer A and doesn't pose unacceptable risks to the water environment, a <b>site-specific policy</b> should ensure that a contamination investigation along with a remediation strategy and verification process is included.</p>

			<b>Surface water /and or Groundwater Flooding</b> - We would refer you to Hampshire County Council as the Lead Local Flood Authority for comment on Flood risk associated with Surface Water and Groundwater at this site.
13. W&B5 – North of Louisburg Employment Proposal	380 SU7983036868	Employment	<p><b>Principal aquifer, history of land contamination, surface water /and or groundwater flooding.</b></p> <p><b>Contamination</b> - This site/or the vicinity of has a history of historic land contamination. To ensure that the planned development, located over principal/secondary aquifer A and doesn't pose unacceptable risks to the water environment, a <b>site-specific policy</b> should ensure that a contamination investigation along with a remediation strategy and verification process is included.</p> <p><b>Surface water /and or Groundwater Flooding</b> - We would refer you to Hampshire County Council as the Lead Local Flood Authority for comment on Flood risk associated with Surface Water and Groundwater at this site.</p>
14. W&B6 – Land at Lion Court, Farnham Rd	382 SU7988337024	Employment	<p><b>Principal aquifer, history of land contamination.</b></p> <p><b>Contamination</b> - This site/or the vicinity of has a history of historic land contamination. To ensure that the planned development, located over principal/secondary aquifer A and doesn't pose unacceptable risks to the water environment, a <b>site-specific policy</b> should ensure that a contamination investigation along with a remediation strategy and verification process is included.</p>
15. W&B7 – Land at Hollywater Road and Mill Chase Road	385 SU8095735432	126	<p><b>Principal aquifer, history of land contamination, surface water /and or groundwater flooding.</b></p> <p><b>Contamination</b> - This site/or the vicinity of has a history of historic land contamination. To ensure that the planned development, located over principal/secondary aquifer A and doesn't pose unacceptable risks to the water environment, a <b>site-specific policy</b> should ensure that a contamination</p>

			<p>investigation along with a remediation strategy and verification process is included.</p> <p><b>Surface water /and or Groundwater Flooding</b> - We would refer you to Hampshire County Council as the Lead Local Flood Authority for comment on Flood risk associated with Surface Water and Groundwater at this site.</p>
16. W&B8 – Land at the Forest Centre, Whitehill and Bordon	388 SU8007235045	44	<p><b>Secondary A aquifer, surface water /and or groundwater flooding.</b></p> <p><b>Surface water /and or Groundwater Flooding</b> - We would refer you to Hampshire County Council as the Lead Local Flood Authority for comment on Flood risk associated with Surface Water and Groundwater at this site.</p>
<b>Horndean</b>			
17. HDN1 – Land at Woodcroft Farm	394 SU6824412210	164	<p><b>Source protection zones 1, 2 and 3, principal aquifer, situated near historical landfills, surface water /and or groundwater flooding.</b></p> <p><b>Groundwater Protection</b> - The site is in an inner source protection zone. These are set up for the Havant and Bedhampton Springs. Which provide a strategically important public water supply.</p> <p>As such there it is likely that there will need to be tight controls on any development to ensure risks can be adequately managed. As with the current permitted applications, any developer would need to work closely with us and Portsmouth Water to ensure the risk are appropriately managed and controlled.</p> <p>We would also highlight that there is the potential for karstic feature to be present within the new allocation areas. A careful assessment of karstic risks should be undertaken as part of any development investigations.</p> <p><b>Contamination</b> - This site is in the vicinity of/and or has a history of historic land contamination. To ensure that the planned development, located over principal/secondary aquifer A and SPZ1, does not pose unacceptable risks to</p>

			<p>the water environment, a <b>site-specific policy</b> should include the need for a contamination investigation along with a remediation strategy and verification process.</p> <p><b>Surface water /and or Groundwater Flooding</b> - We would refer you to Hampshire County Council as the Lead Local Flood Authority for comment on Flood risk associated with Surface Water and Groundwater at this site.</p>
18. HDN2 – Land south of Five Heads Road	397 SU6987313696	118	<p><b>Source protection zones 1, 2 and 3, principal aquifer, situated near historical landfills, surface water /and or groundwater flooding.</b></p> <p><b>Groundwater Protection</b> - The site is in an inner source protection zone. These are set up for the Havant and Bedhampton Springs. Which provide a strategically important public water supply.</p> <p>As such there it is likely that there will need to be tight controls on any development to ensure risks can be adequately managed. As with the current permitted applications, any developer would need to work closely with us and Portsmouth Water to ensure the risk are appropriately managed and controlled.</p> <p>We would also highlight that there is the potential for karstic feature to be present within the new allocation areas. A careful assessment of karstic risks should be undertaken as part of any development investigations.</p> <p><b>Contamination</b> - We also note that for HDN2, a historic landfill is mapped on the edge of the development area. Due to the presences of the SPZ1, the area is extremely sensitive to any contamination. To ensure that the planned development, located over principal/secondary aquifer A and SPZ1, does not pose unacceptable risks to the water environment, a <b>site-specific policy</b> should include the need for a contamination investigation along with a remediation strategy and verification process.</p>

			<p><b>Surface water /and or Groundwater Flooding</b> - We would refer you to Hampshire County Council as the Lead Local Flood Authority for comment on Flood risk associated with Surface Water and Groundwater at this site.</p>
19. HDN3 – Land north of Chalk Hill Road	400 SU7023413682	38	<p><b>Source protection zones 1, 2 and 3, principal aquifer, history of land contamination, surface water /and or groundwater flooding.</b></p> <p><b>Groundwater Protection</b> - The site is in an inner source protection zone. These are set up for the Havant and Bedhampton Springs. Which provide a strategically important public water supply.</p> <p>As such there it is likely that there will need to be tight controls on any development to ensure risks can be adequately managed. As with the current permitted applications, any developer would need to work closely with us and Portsmouth Water to ensure the risk are appropriately managed and controlled.</p> <p>We would also highlight that there is the potential for karstic feature to be present within the new allocation areas. A careful assessment of karstic risks should be undertaken as part of any development investigations.</p> <p><b>Contamination</b> - This site is in the vicinity of/and or has a history of historic land contamination. To ensure that the planned development, located over principal/secondary aquifer A and SPZ1, does not pose unacceptable risks to the water environment, a <b>site-specific policy</b> should include the need for a contamination investigation along with a remediation strategy and verification process.</p> <p><b>Surface water /and or Groundwater Flooding</b> - We would refer you to Hampshire County Council as the Lead Local Flood Authority for comment on Flood risk associated with Surface Water and Groundwater at this site.</p>

<b>Liphook</b>			
20. LIP1 – land North of Haslemere Road, Liphook	406 SU8512331856	24	<p><b>Flood zone 2, principal aquifer, Main River, surface water /and or groundwater flooding.</b></p> <p><b>Nature Recovery</b> - The site is located close to the river Wey. <b>A site-specific policy</b> should require a large undeveloped buffer zone of at least 10-metres to the watercourse. We would like to see a commitment to the restoration of the river Wey as part of any development and we would welcome discussions with the council in this regard.</p> <p><b>Flood Risk</b> - There is evidence of historical Flooding at this site which will need to be considered.</p> <p>Notwithstanding our comments regarding the SFRA we recommend a <b>Site-Specific policy</b> which sets out the requirement for a Flood Risk Assessment which demonstrates that the development will be safe for its lifetime taking account of the vulnerability of its uses, without increasing Flood risk elsewhere, and, where possible, will reduce Flood risk overall. We also recommend all development avoids Flood Zones 2 &amp; 3 that includes climate change allowances for the lifetime of the development, with a policy of a suitable buffer zone. It is good to see policy of a buffer zone, however, we recommend a value is given to this proposed buffer zone, such as 10 metres or more to ensure structural integrity of the watercourse and access requirements are maintained which will both ensure Flood risk is not increased. The value given should be specific to the site and justified by site specific reasons.</p> <p><b>Surface water /and or Groundwater Flooding</b> - We would refer you to Hampshire County Council as the Lead Local Flood Authority for comment on Flood risk associated with Surface Water and Groundwater at this site.</p>
21. LIP2 - Land West of Headley Road, Liphook	408 SU8365332314	20	Principal aquifer.

22. LIP3 – Land at Chittley Farm	410 SU8489931357	67	<p><b>Principal aquifer, history of land contamination, surface water /and or groundwater flooding.</b></p> <p><b>Contamination</b> - This site/or the vicinity of has a history of historic land contamination. To ensure that the planned development, located over principal/secondary aquifer A and doesn't pose unacceptable risks to the water environment, a <b>site-specific policy</b> should ensure that a contamination investigation along with a remediation strategy and verification process is included.</p> <p><b>Surface water /and or Groundwater Flooding</b> - We would refer you to Hampshire County Council as the Lead Local Flood Authority for comment on Flood risk associated with Surface Water and Groundwater at this site.</p>
<b>Clanfield</b>			
23. CFD1 – Land at Clanfield County Farm	416 SU6966916245	100	<p><b>Source protection zones 2 and 3, principal aquifer, surface water /and or groundwater flooding.</b></p> <p><b>Groundwater Protection</b> - The site is in the SPZ2 for Havant and Bedhampton Springs. Which provide a strategically important public water supply. Due to the sensitivity of this particular zone, and increased prevalence of Karst known to be present in the wider SPZ, additional scrutiny, assessment and safeguards may need to apply to any development.</p> <p><b>Surface water /and or Groundwater Flooding</b> - We would refer you to Hampshire County Council as the Lead Local Flood Authority for comment on Flood risk associated with Surface Water and Groundwater at this site.</p>
24. CFD2 – Land at Drift Rd	420 SU7022915620	80	<p><b>Source protection zones 2 and 3, principal aquifer, surface water /and or groundwater flooding.</b></p> <p><b>Groundwater Protection</b> - The site is in the SPZ2 for Havant and Bedhampton Springs. Which provide a strategically important public water supply. Due to the sensitivity of this particular zone, and increased prevalence of Karst known</p>



			<p>to be present in the wider SPZ, additional scrutiny, assessment and safeguards may need to apply to any development.</p> <p><b>Surface water /and or Groundwater Flooding</b> - We would refer you to Hampshire County Council as the Lead Local Flood Authority for comment on Flood risk associated with Surface Water and Groundwater at this site.</p>
<b>Four Marks</b>			
25. FMS1 – Land West of Lymington Barn	425 SU6608134978	90	<p><b>Principal aquifer, history of land contamination.</b></p> <p><b>Foul Water Disposal</b> - It is essential that the developer engages the sewer undertaker at the earliest possible stage to ensure that they can provide coverage for any new development.</p> <p>The geological condition of the area would result in very significant challenges and limitations on alternative means of disposal for any foul sewage. There is a significant probability that <b>we would not be able to grant Environmental permit</b> for a new non-mains discharge in this area, particularly if any system cannot meet British standard (BS:6297) method (such as boreholes or other deep infiltration soakaways).</p> <p>If the infiltration system is not sized or designed in accordance with guidance in the British Standard it is likely to concentrate the discharge over a smaller area and/or discharge at a greater depth. This will pose a higher risk of groundwater pollution because it reduces the potential for further treatment of the effluent compared to a drainage field meeting the British Standard. As such, we are far more likely to refuse an environmental permit for such discharges. Our preferred infiltration systems are drainage fields designed in accordance with British Standard B26297.</p> <p>We may also restrict the uses of deep infiltration systems for surface water drainage, particularly within any area of additional sensitivity such as source protection zone 1.</p>

			<p><b>Contamination</b> - This site/or the vicinity of has a history of historic land contamination. To ensure that the planned development, located over principal/secondary aquifer A and doesn't pose unacceptable risks to the water environment, a <b>site-specific policy</b> should ensure that a contamination investigation along with a remediation strategy and verification process is included.</p>
26. FMS2 – Land rear of 97 – 103 Blackberry Lane	428 SU6685634430	20	<p><b>Principal aquifer.</b></p> <p><b>Foul Water Disposal</b> - It is essential that the developer engages the sewer undertaker at the earliest possible stage to ensure that they can provide coverage for any new development.</p> <p>The geological condition of the area would result in significant challenges and limitations on alternative means of disposal for any foul sewage. There is a significant probability that <b>we would not be able to grant an Environmental permit</b> for new non- mains discharges in this area, particularly if any system cannot meet British standard (BS:6297) method (such as boreholes or other deep infiltration soakaways).</p> <p>If the infiltration system is not sized or designed in accordance with guidance in the British Standard it is likely to concentrate the discharge over a smaller area and/or discharge at a greater depth. This will pose a higher risk of groundwater pollution because it reduces the potential for further treatment of the effluent compared to a drainage field meeting the British Standard. As such, we are far more likely to refuse an environmental permit for such discharges. Our preferred infiltration systems are drainage fields designed in accordance with British Standard B26297.</p> <p>We may also restrict the uses of deep infiltration systems for surface water drainage.</p>

			<p><b>Contamination</b> - This site/or the vicinity of has a history of historic land contamination. To ensure that the planned development, located over principal/secondary aquifer A and doesn't pose unacceptable risks to the water environment, a <b>site-specific policy</b> should ensure that a contamination investigation along with a remediation strategy and verification process is included.</p>
27. FMS3 – Boundaries Surgery	430 SU6725735333	Health	<p><b>Principal aquifer, history of land contamination.</b></p> <p><b>Foul Water Disposal</b> - It is essential that the developer engages the sewer undertaker at the earliest possible stage to ensure that they can provide coverage for any new development.</p> <p>The geological condition of the area would result in significant challenges and limitations on alternative means of disposal for any foul sewage. There is a significant probability that we would not be able to grant Environmental permits for new non- mains discharges in this area, particularly if any system cannot meet British standard (BS:6297) method (such as boreholes or other deep infiltration soakaways). If the infiltration system is not sized or designed in accordance with guidance in the British Standard it is likely to concentrate the discharge over a smaller area and/or discharge at a greater depth. This will pose a higher risk of groundwater pollution because it reduces the potential for further treatment of the effluent compared to a drainage field meeting the British Standard. As such, we are far more likely to refuse an environmental permit for such discharges. Our preferred infiltration systems are drainage fields designed in accordance with British Standard B26297.</p> <p>We may also restrict the uses of deep infiltration systems for surface water drainage, particularly within any area of additional sensitivity such as source protection zone 1.</p> <p><b>Contamination</b> - This site/or the vicinity of has a history of historic land contamination. To ensure that the planned development, located over principal/secondary aquifer A and doesn't pose unacceptable risks to the</p>

			water environment, a <b>site-specific policy</b> should ensure that a contamination investigation along with a remediation strategy and verification process is included.
28. FMS4 – Land south of Winchester Road, Four marks	432 SU6573934391	100	<p><b>Principal aquifer, history of land contamination.</b></p> <p><b>Foul Water Disposal</b> - It is essential that the developer engages the sewer undertaker at the earliest possible stage to ensure that they can provide coverage for any new development.</p> <p>The geological condition of the area would result in significant challenges and limitations on alternative means of disposal for any foul sewage. There is a significant probability that we would not be able to grant an <b>Environmental permit for</b> new non-mains discharges in this area, particularly if any system cannot meet British standard (BS:6297) method (such as boreholes or other deep infiltration soakaways). If your infiltration system is not sized or designed in accordance with guidance in the British Standard it is likely to concentrate the discharge over a smaller area and/or discharge at a greater depth. This will pose a higher risk of groundwater pollution because it reduces the potential for further treatment of the effluent compared to a drainage field meeting the British Standard. As such, we are far more likely to refuse an environmental permit for such discharges. Our preferred infiltration systems are drainage fields designed in accordance with British Standard B26297.</p> <p>We may also restrict the uses of deep infiltration systems for surface water drainage, particularly within any area of additional sensitivity such as source protection zone 1.</p> <p><b>Contamination</b> - This site/or the vicinity of has a history of historic land contamination. To ensure that the planned development, located over principal/secondary aquifer A and doesn't pose unacceptable risks to the water environment, a <b>site-specific policy</b> should ensure that a contamination</p>

			investigation along with a remediation strategy and verification process is included.
29. FMS5 – Land at Fordlands, Brislands Lane, Four Marks	485 SU6650934216	Travellers Pitch x 2	<p><b>Principal aquifer, history of land contamination.</b></p> <p><b>Foul Water Disposal</b> - It is essential that the developer engages the sewer undertaker at the earliest possible stage to ensure that they can provide coverage for any new development.</p> <p>The geological condition of the area would result in significant challenges and limitations on alternative means of disposal for any foul sewage. There is a significant probability that we would not be able to grant an Environmental permit for new non-mains discharges in this area, particularly if any system cannot meet British standard (BS:6297) method (such as boreholes or other deep infiltration soakaways).</p> <p>If the infiltration system is not sized or designed in accordance with guidance in the British Standard it is likely to concentrate the discharge over a smaller area and/or discharge at a greater depth. This will pose a higher risk of groundwater pollution because it reduces the potential for further treatment of the effluent compared to a drainage field meeting the British Standard. As such, we are far more likely to refuse an environmental permit for such discharges. Our preferred infiltration systems are drainage fields designed in accordance with British Standard B26297.</p> <p>We may also restrict the uses of deep infiltration systems for surface water drainage, particularly within any area of additional sensitivity such as source protection zone 1.</p> <p><b>Contamination</b> - This site/or the vicinity of has a history of historic land contamination. To ensure that the planned development, located over principal/secondary aquifer A and doesn't pose unacceptable risks to the water environment, a <b>site-specific policy</b> should ensure that a contamination</p>

			investigation along with a remediation strategy and verification process is included.
<b>Rowlands Castle</b>			
30. RLC1 – Land at Deerleap (North)	440 SU7319910604	5	<p><b>Flood Zones 2 and 3, source protection zones 2 and 3, principal aquifer.</b></p> <p><b>Groundwater Protection</b> - This site is in an inner source protection zone. These are set up for the Havant and Bedhampton Springs. Which provide a strategically important public water supply. As such there it is likely that there will need to be tight controls on any development to ensure risks can be adequately managed, particularly in relation to any sewage disposal. As with the current permitted applications in this SPZ1, any developer would need to work closely with us and Portsmouth Water to ensure the risk are appropriately managed and controlled.</p> <p>We would also highlight that there is the potential for karstic feature to be present within the new allocation areas. A careful assessment of karstic risks should be undertaken as part of any development investigations.</p> <p><b>Flood Risk</b> - Notwithstanding our comments regarding the SFRA we recommend a <b>Site-Specific policy</b> which sets out the requirement for a Flood Risk Assessment which demonstrates that the development will be safe for its lifetime taking account of the vulnerability of its uses, without increasing Flood risk elsewhere, and, where possible, will reduce Flood risk overall. We also recommend all development avoids Flood Zones 2 &amp; 3 that includes climate change allowances for the lifetime of the development, with a policy of a suitable buffer zone. It is good to see policy of a buffer zone, however, we recommend a value is given to this proposed buffer zone, such as 10 metres or more to ensure structural integrity of the watercourse and access requirements are maintained which will both ensure Flood risk is not increased. The value given should be specific to the site and justified by site specific reasons.</p>

31. RLC2 – Land at Deerleap (South)	443 SU7319810527	8	<p><b>Source protection zones 1, 2 and 3, principal aquifer.</b></p> <p><b>Groundwater Protection</b> - This site is in an inner source protection zone. These are set up for the Havant and Bedhampton Springs. Which provide a strategically important public water supply. As such there it is likely that there will need to be tight controls on any development to ensure risks can be adequately managed, particularly in relation to any sewage disposal. As with the current permitted applications in this SPZ1, any developer would need to work closely with us and Portsmouth Water to ensure the risk are appropriately managed and controlled.</p> <p>We would also highlight that there is the potential for karstic feature to be present within the new allocation areas. A careful assessment of karstic risks should be undertaken as part of any development investigations.</p>
32. RLC3 – Land at Oaklands House	446 SU7294209762	51	<p><b>Source protection zones 1c and 4, secondary A aquifer.</b></p> <p><b>Groundwater Protection</b> - This site is in an inner source protection zone. These are set up for the Havant and Bedhampton Springs. Which provide a strategically important public water supply. As such there it is likely that there will need to be tight controls on any development to ensure risks can be adequately managed, particularly in relation to any sewage disposal. As with the current permitted applications in this SPZ1, any developer would need to work closely with us and Portsmouth Water to ensure the risk are appropriately managed and controlled.</p> <p>We would also highlight that there is the potential for karstic feature to be present within the new allocation areas. A careful assessment of karstic risks should be undertaken as part of any development investigations.</p>
33. RLC4 – Land at Little Leigh Farm	448 SU7285808754	81	<p><b>Source protection zone 1c, secondary aquifer.</b></p>

			<b>Groundwater Protection</b> - This site is in the SPZ1C for the Havant and Bedhampton springs. The SPZ1C, refers to a confined aquifer. In this location the chalk aquifer that supports the groundwater source is confined from the surface by layers of clay. As such it is unlikely that water draining into the surface at this site is likely to impact on the source. There may however be constraints on anything that could impact the sources at depth (such as deep piling, or any borehole soakaway). The site though is not directly in a SPZ1.
<b>North Area</b>			
34. BEN1 – Land west of Hole Lane, Bentley	455 SU7810544047	20	Source protection zone 3, principal aquifer
35. BWH1 – Top Field land adjacent to Glebe Field	458 SU6682840388	5	Source protection zone 3, principal aquifer
36. BWH2 – Land at the corner of Church Street	461 SU6635340361	5	Source protection zone 3, principal aquifer
37. MSD1 – Land rear of Junipers Medstead	463 SU6555136907	16	Source protection zone 3, principal aquifer
<b>Northeast Area</b>			
38. HED1 – Land at Middle Common	468 SU8469436603	6	Principal aquifer
39. HOP1 – Land North of Fullers Road, Holt Pound	470 SU8166743703	19	<p><b>Flood Zone 2 &amp; 3, Secondary Aquifer.</b></p> <p><b>Nature Recovery</b> - The site is located at the headwater of the Farnham Bourne. All headwaters are priority habitats, but this has not been identified as a constraint. <b>A site-specific policy</b> should ensure a large undeveloped buffer zone of at least 10-metres to the watercourse. We would like to see a commitment to the restoration of the Farnham Bourne as part of any development and we would welcome discussions with the council in this regard.</p> <p><b>Flood Risk</b> - Notwithstanding our comments regarding the SFRA we recommend a <b>Site-Specific policy</b> which sets out the requirement for a Flood Risk Assessment which demonstrates that the development will be safe for its</p>



			lifetime taking account of the vulnerability of its uses, without increasing Flood risk elsewhere, and, where possible, will reduce Flood risk overall. We also recommend all development avoids Flood Zones 2 & 3 that includes climate change allowances for the lifetime of the development, with a policy of a suitable buffer zone. It is good to see policy of a buffer zone, however, we recommend a value is given to this proposed buffer zone, such as 10 metres or more to ensure structural integrity of the watercourse and access requirements are maintained which will both ensure Flood risk is not increased. The value given should be specific to the site and justified by site specific reasons.
<b>South Area</b>			
40. CTN1- Land at Parsonage Farm	476 SU6932213991	6	<p><b>Source Protection Zone, 1,2 &amp; 3, principal aquifer.</b></p> <p><b>Groundwater Protection</b> - This site is in an inner source protection zone. These are set up for the Havant and Bedhampton Springs. Which provide a strategically important public water supply. As such there it is likely that there will need to be tight controls on any development to ensure risks can be adequately managed. As with the current permitted applications, any developer would need to work closely with us and Portsmouth Water to ensure the risk are appropriately managed and controlled.</p> <p>We would also highlight that there is the potential for karstic feature to be present within the new allocation areas. A careful assessment of karstic risks should be undertaken as part of any development investigations.</p>
41. CTN2 – Land at the Dairy	478 SU6933114134	7	<p><b>Source Protection Zone, 1,2 &amp; 3, principal aquifer.</b></p> <p><b>Groundwater Protection</b> - This site is in an inner source protection zone. These are set up for the Havant and Bedhampton Springs. Which provide a strategically important public water supply. As such there it is likely that there will need to be tight controls on any development to ensure risks can be adequately managed. As with the current permitted applications, any</p>

			<p>developer would need to work closely with us and Portsmouth Water to ensure the risk are appropriately managed and controlled.</p> <p>We would also highlight that there is the potential for karstic feature to be present within the new allocation areas. A careful assessment of karstic risks should be undertaken as part of any development investigations.</p>
42. LOV1 – Land rear of 191-211 Lovedean Lane	480 SU6839712875	30	<p><b>Source Protection Zone, 1,2 &amp; 3, secondary aquifer.</b></p> <p><b>Groundwater Protection</b> - This site is in an inner source protection zone. These are set up for the Havant and Bedhampton Springs. Which provide a strategically important public water supply. As such there it is likely that there will need to be tight controls on any development to ensure risks can be adequately managed. As with the current permitted applications, any developer would need to work closely with us and Portsmouth Water to ensure the risk are appropriately managed and controlled.</p> <p>We would also highlight that there is the potential for karstic feature to be present within the new allocation areas. A careful assessment of karstic risks should be undertaken as part of any development investigations.</p>

## **Evidence Base**

Department for Environment, Food and Rural Affairs (2023). *Plan for Water*. [online] Available at: <https://www.gov.uk/government/publications/plan-for-water-our-integrated-plan-for-delivering-clean-and-plentiful-water>.

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Environment Agency (2022). *River basin management plans: updated 2022*. [online] Available at: <https://www.gov.uk/guidance/river-basin-management-plans-updated-2022>.

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GU31 4EX

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**Our ref:** East Hants / Other Matters  
**Your ref:**

7<sup>th</sup> February 2024

Dear Sir of Madam

**RESPONSE TO REGULATION 18 CONSULTATION - OUR LOCAL PLAN 2021 – 2040 REGULATION 18 – EAST HAMPSHIRE LOCAL PLAN**

Thank you for your email of the 22<sup>nd</sup> January 2024 and the opportunity to respond to the consultation. Having considered the proposed local plan I have the following comments to make with reference to the prevention of crime and disorder<sup>1</sup>.

We are pleased to see the comments of our previous consultation have in great measure been incorporated into this iteration of the Local Plan.

Integrated Impact Assessment Objectives, Point 5

Many communities also suffer the effects of ‘disorder’, which includes anti-social behaviour and other behaviour adversely affecting the local environment. Disorder in this context relates to activities that fall below the level of criminality, however, the effects can be devastating for the individuals involved and communities.

When referenced within the document, “5. To actively promote health and wellbeing across East Hampshire and create safe communities free from crime”

The above objective does not mention disorder but it affects many communities. We would ask that this assessment objective is amended to read, “5. To actively promote health and wellbeing across East Hampshire and create safe communities free from crime and disorder”

Policy DGC2 Sustainable Transport

Paragraph DGC 2.2, gives the conditions that must be met to allow development to be permitted.

<sup>1</sup> In the context of this letter “disorder” includes Anti-Social Behaviour (ASB)



[www.hampshire.police.uk](http://www.hampshire.police.uk)



Deaf? Non-emergency text **07781 480999**



For crime and community information [www.hampshirealert.co.uk](http://www.hampshirealert.co.uk)





At subparagraph b:

b. provides attractive and well-designed walking and cycling networks with relevant supporting infrastructure that will improve the perceived safety and security of these modes;

The perception that a route or activity is safer than it actually is, may cause people to pursue a course of action which ultimately places them in danger. The aim should be to improve the safety of the route or activity not just its perception. We would suggest that the word “perceived” is removed from paragraph DGC 2.2 subparagraph b.

If I can be of any further assistance please do not hesitate to contact me.

I would be grateful if you would contact me at the next stage of the consultation process.

Yours faithfully,

[Redacted Signature]

Designing Out Crime Officer



East Hampshire District Council  
Civic Offices  
Penns Place  
Petersfield  
Hampshire  
GU31 4EX

Hampshire 2050  
The Castle  
Winchester, Hampshire SO23 8UL  
Telephone 0300 555 1375  
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Enquiries to

[REDACTED]

My reference

Direct Line

[REDACTED]

Your reference

Date

7 March 2024

E-mail

[REDACTED]

**For the attention of** [REDACTED]

Dear Sir,

### **East Hampshire District Council Local Plan 2021-2040 Regulation 18 Consultation**

Thank you for consulting Hampshire County Council on the East Hampshire District Council draft Local Plan. The County Council provides a detailed response in its capacity as the Local Highway Authority (including public rights of way), Local Education Authority, Minerals and Waste Planning Authority, Lead Local Flood Authority, and as a Public Health body, responsible for ensuring the health and wellbeing of Hampshire's population as a key stakeholder in the planning process. These detailed comments can be found appended to this letter.

Due to the lack of evidence including a transport assessment to review, the Highway Authority is currently unable to support the allocation of ALT8 Land at Neatham Manor Farm, Alton.

Hampshire County Council has recently adopted a new Local Transport Plan (LTP4) for the County. This document sets out the vision intended outcomes, guiding principles and policies for planning and delivering transport in Hampshire in the period up to 2050. Key objectives within this document are the encouragement of modal shift, decarbonising the transport system and the need to plan more effectively for people and places.

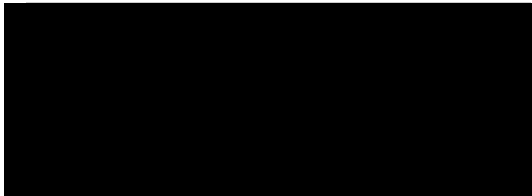
Policies related to health and wellbeing, carbon reduction climate change, healthy streets, site allocations and inclusivity would usefully be strengthened by reference to the LTP4. Public Health Hampshire have a range of resources and advice for refining policies to tackle health and wellbeing challenges in East Hampshire and welcome on-going engagement.

Director of Hampshire 2050

[REDACTED]

I trust that this is helpful. Should you have any queries or wish to discuss this further, please do not hesitate to contact [REDACTED] using the details at the top of this letter.

Yours sincerely,



Head of Spatial Planning  
Hampshire 2050

## APPENDIX 1

### Detailed Hampshire County Council Comments on the draft Local Plan Policies

Section/ policy	Comment/ suggestion
01: Introduction and background	Draft Local Plan should include links to other documents such as the Hampshire Minerals and Waste Plan (HMWP) and its policies where applicable. The County Council can advise further.
02 Vision and Objectives p.28	<p>The County Council, as the authority with public health responsibilities, welcome putting healthy, accessible and inclusive communities front-and-centre in the Plan's vision. There are many cross-cutting themes that align with <a href="#">Hampshire's Public Health Strategy 2023-2026</a></p> <p>Suggestion: strengthen the link between health, wellbeing and climate change by reference to the Public Health Strategy. Reference to Chapter 8 of the NPPF within National Planning Policies section (1.5 page 14) would also reinforce this key thread within the plan.</p> <p>Encourage clear reference to East Hampshire Welfare and Wellbeing Strategy (refresh due Sept 2024) to demonstrate how, across the organisation, health is a thread woven throughout all decisions and policies.</p> <p>The objectives could helpfully cross reference to other objectives in sections A and B around sustainable growth and quality/greener development. The broader consideration of wider determinates as set out within the Integrated Impact Assessment would allow the delivery to widen these healthy place objectives. The County Council can provide further advice on prioritising the health and well-being of communities in delivering what's needed to support new development.</p>
<b>04: Responding to the climate emergency</b>	
p.48 chapter 4	Suggest strengthening the link to climate change and health within this policy. The impacts of climate change are likely to disproportionately impact those in the most deprived areas.
CLIM 1: Tackling the climate emergency	Policy CLIM1 should explicitly include the benefits to health of addressing the climate emergency such as air quality, noise pollution, reduction in risk of urban over-heating, drought and flooding.



Section/ policy	Comment/ suggestion
CLIM 1.1	<p>Suggest including reference to the carbon management hierarchy to reduce the production of further carbon from development (in accordance with Policy C4 of Local Transport Plan 4 (LTP4)). This seeks to place climate change at the heart of decision-making by employing an avoid-reduce-replace-offset hierarchy approach to carbon management.</p>
CLIM 1.2 CLIM 1.3 CLIM 1.4	<p>Suggest inclusion of a requirement to investigate opportunities to reduce travel demand and the need to travel, as well as prioritising sustainable modes of travel. Policy C3 of LTP4 sets out a Road User Utility Framework which the Highway Authority would expect to be reflected in the design proposals of any new development.</p> <p>Also suggest reference to this Framework in part d. of policy CLIM 1.3.</p> <p>Criterion e. of policy CLIM1.3 is supported- suggest clarifying in supporting text that this requirement should not be limited to provision of infrastructure for use of private cars only, and that all vehicle types and users are considered.</p> <p>The requirement for carbon emissions (particularly those from transport) to be quantified and assessed as part of the Sustainability Statement is supported. This aligns with Department for Transport advice<sup>1</sup> on the quantification of carbon from transport and policies C4 and DM2 of LTP4.</p>
CLIM 1-5	<p>In its role as a public landowner and statutory functions in delivering operational public-built assets, such as new schools and care homes, the County Council suggests that the draft Local Plan is consistent with the national target of achieving carbon neutral by 2050 in line with para.159(b) of National Planning Policy Framework (2023) stating, “<i>any local requirements for the sustainability of buildings should reflect the Government’s policy for national technical standards.</i>”</p> <p>Recommend referring to data in the Joint Strategic Needs Assessment (JSNA) showing that in East Hampshire in 2022 there were more D – G energy rated houses than A – C rated, with roughly two thirds of these low EPC rated homes being owner-occupied. Thus, as well as ensuring that new developed are efficient it is important that this plan recognises the need to work with residents to improve the existing housing stock.</p>

<sup>1</sup> Transport Decarbonisation: Local Authority Toolkit, Department for Transport (2022), <https://www.gov.uk/government/collections/transport-decarbonisation-local-authority-toolkit>

Section/ policy	Comment/ suggestion
	<p>The County Council can advise on policy wording which supports the delivery of the Healthy Homes principle, which recognise the need for climate resilience, thermal comfort (helping reduce fuel poverty), preventing air pollution, reducing carbon emissions, and limited noise and light pollution.</p>
CLIM 4.1	<p>Suggest include wording to ensure impacts on the public rights of way (PROW) network are considered. Solar farms and wind farms can have very significant adverse impacts to the PROW network through enclosure and landscape impacts. PROW area sensitive receptor for impact and pollution assessments.</p> <p>Additional wording is recommended to criterion c:</p> <p>c. the impacts are acceptable on the amenity of sensitive neighbouring uses (including local residents <u>and the Public Rights of Way network</u>) by virtue of matters such as noise, dust, odour, shadow flicker, air quality and traffic.</p> <p>Suggest additional supporting paragraph:</p> <p><u>It is important that development protects and enhancements the public rights of way network, and that it does not impact upon the safe public, priority use of these rights of way. This includes maintaining the amenity of these routes, and their rural character. The additional enclosure of public rights of way is only acceptable in exceptional circumstances with sufficient mitigation to minimise the impacts.</u></p>
<b>Section 05: Safeguarding our natural and built environment</b>	
<p>NBE1: Development in the Countryside</p> <p>NBE 1.1</p>	<p>Suggest strengthening criterion c by reference to expected standards for the distance between the development site and access to sustainable transport modes. The Standing Advice Note from Active Travel England<sup>2</sup> on active travel and sustainable development provides guidance.</p> <p>Recommended that <u>additional wording</u> is added to the policy criteria: <u>X. provide protection and enhancement of the public rights of way network.</u></p> <p>Suggested additional supporting paragraph:</p>

<sup>2</sup> Standing Advice Note: Active travel and sustainable development, Active Travel England (2023), <https://assets.publishing.service.gov.uk/media/652e5d136972600014ccf984/active-travel-england-standing-advice-note-active-travel-and-sustainable-development.pdf>

Section/ policy	Comment/ suggestion
	<p><u>5.X development shall recognise the Public Right of Way network and should not result in an adverse impact on that network, rather it should provide protection and enhancement, including to the safe public priority use of the public rights of way network. The additional enclosure of public rights of way is only acceptable in exceptional circumstances with sufficient mitigation to minimise the impacts. The use of public rights of way as motorised vehicular access routes is typically unacceptable. Development proposals will suitably mitigate and compensate for adverse impacts to onsite and offsite countryside infrastructure.</u></p>
<p>NBE2 Biodiversity</p>	<p>Nature conservation contributes to prevention of ill-health through benefits to both <a href="#">physical</a> and <a href="#">mental</a> health of residents via opportunities for nature connection. See <a href="#">Connection to Nature - EIN068 (naturalengland.org.uk)</a>. The Hampshire <a href="#">JSNA</a> states that in East Hampshire rates of referral for mental health services is increasing, with rates for females in 2021 at 163 per 10,000 compared to 122 per 10,000 in 2017. A greener environment that helps to contribute to positive mental and physical health for residents, and environment health is key.</p> <p>Policy NBE10 established landscape also contributes to the mental wellbeing of residents through increased opportunity for nature connection.</p>
<p>NBE7 Managing Flood Risk (SFRA)</p>	<p>The Lead Local Flood Authority (LLFA) note that a level 1 Strategic Flood Risk Assessment (SFRA), Level 2 SFRA and Sequential Test documents have been produced to support the Local Plan.</p> <p>It is noted that the recommendations from this document have been used to shape the districts flood risk policy (including 7.3-7.5 on Sustainable Drainage Systems (SuDS) and groundwater flooding issues).</p>
<p>NBE7 Managing Flood Risk (catchment management plans)</p>	<p>LLFA requires that this policy includes a link to the County Council's Catchment Management Plans (priority areas) (and other references in paragraph 5.57).</p> <p>The Catchment Management Plans Priority Areas cover all/part of 14 site allocations in the emerging Plan.</p> <p>Request amended policy wording:</p> <p><u>Any development proposed within a flood risk priority area identified in Hampshire County Council's Catchment Management Plans, will be expected to comply with the policy statements in those Plans (and any updates and future action plans).</u></p>

Section/ policy	Comment/ suggestion
NBE7 Managing Flood Risk (monitoring)	Given that there are elements of this policy that fall within the remit of the LLFA to comment on such as NEB7.1 c),e), 7.3, 7.4 it will be necessary to consider the LLFA objections as well to fully monitor the entire policy.
NBE7 Managing Flood Risk (general- culverting)	<p>The LLFA would expect all watercourse routes on any allocated sites to be retained as close to their current alignment as possible. Culverting of these watercourses will not be permitted except for essential access. Early pre-application discussions should be undertaken with the LLFA if there is considered to be a need for culverting.</p> <p>The County Council can provide other general advice on applying the Flood Map for Surface Water.</p>
NBE10 Landscape  10.2	<p>Recommended including a requirement that proposals must respect the sense of place, sense of tranquillity or remoteness, and the quiet enjoyment, of the landscape from public rights of way. Suggest additional point to NBE10.2:</p> <p>‘Development proposals will be supported where there will be no significant impact to: The Public Right of Way network.’</p>
NBE12: Green and Blue Infrastructure	<p>The County Council can advise on policy wording to ensure new landscape proposals function for climate resilience and health outcomes.</p> <p>The public rights of way network is not referenced as part of the Green Infrastructure network. Recommended inclusion of reference to Para 5.83 (or as an additional supporting para):</p> <p><u>Para 5.83 Green and blue Infrastructure (GI) describes all of the natural and managed green spaces, features and water bodies that together make up a multifunctional network or grid across rural and urban areas. This includes the public rights of way network, that, as well as providing travel infrastructure in the rural environment, provides green corridors linking other green and blue infrastructure.</u></p> <p>Additionally, it is recommended the following additional wording be added to Policy NBE12.1 e):</p> <p>where new green infrastructure is provided within new development, suitable arrangements should be in place for its future funding, maintenance and management long term. <u>This includes for public rights of way.</u></p> <p>The following additional point to the wording of Policy NBE12 is also recommended:</p>

Section/ policy	Comment/ suggestion
	<p><u>It protects and enhances the quality and extent of public rights of way, access to the countryside, and network connectivity. Where relevant, the proposal will include the enhancement of the public rights of way network, both onsite and offsite. This may include suitable and enhancing diversions.</u></p>
NBE 13: Protection of Natural Resources	Suggest reference made to the Hampshire Minerals and Waste Plan in the 'Why we need this policy' section and the 'Minerals' section of the implementation supporting text.
NBE14 Heritage assets and the historic environment	Page 136: recommended that <u>Historic public rights of way</u> be added to the list under historic landscapes.
<b>Section 06 Creating Desirable Places</b>	
p.145 Objective B	<p>The benefits of healthy urbanism approaches through design should form a key part of the development policies. Healthy approaches to design can impact on numerous areas of health and wellbeing. Frameworks such as Building for Healthy Life (BHL) and Streets for Healthy Life (SHL) form key baseline monitoring assessments to ensure the aims of these policies are followed through to implementation and delivery.</p> <p>The County Council can provide best practice examples of planning policy and guidance related to inclusive design, including creating environments that help people to remain living independent for longer. In particular, using the <a href="#">Healthy Streets</a> approach puts people who are walking and cycling as the priority and supports active travel, physical activity, social cohesion and feeling safe, and improved mental health, as well as other benefits such as reductions in air and noise pollution and economic benefits to local streets.</p>
DES1: Well- Designed Places  DES 1.1	<p>Suggest including an expectation that applicants make reference to the cycling network and walking zones identified in the East Hampshire Local Cycling and Walking Infrastructure Plan (currently in development), seeking to deliver elements of the network as appropriate to the site.</p> <p>Further clarification is needed to Policy DES1 to understand the rationale behind prioritising the avoidance of new greenhouse gas emissions above the other National Design Guide characteristics of a well-designed place.</p>
DES3: Residential Density and	The requirement for development densities to be within the range of neighbouring residential densities is queried. Low-density development is intrinsically less sustainable in transport terms.

Section/ policy	Comment/ suggestion
Local Character  DES 3.1	Mitigation of landscaping impacts should not rely on low-density development, rather high-quality design, and well-designed planting.  Maximising density of sites will make local facilities, public transport, and active travel more viable and opportunities to maximise density should be pursued, which may mean planning for higher densities that have previously been delivered on adjoining sites.
DES4 Design Codes	The County Council as public landowner, is concerned that the draft policy excludes characteristics of national guidance such as the National Design Guide (Context, Identity, Uses, Public Spaces and Nature). It also seeks clarifications with regard to the design code and which development this would apply to and expected date of implementation.  The County Council report that new design codes predominantly focus on the external appearance of designs which can lead to a neglect of human health focused outcomes and seek that coding policies ensure that the health outcome of design codes are equally reflected in their wording and guidance. The County Council can advise on policy wording and practice.

Section/ policy	Comment/ suggestion
<b>07: Enabling Communities to Live Well</b>	
p.171 Figure 7.1	Suggestions for this image around the JSNA - inclusion of 'strong, vibrant, <i>inclusive</i> and healthy communities...'. Suggest changes to wider determinants of health: <ul style="list-style-type: none"> <li>• change 'exercise' to 'physical activity'</li> <li>• include 'substance use' in health behaviours,</li> <li>• include 'community connection', 'education <i>and skills</i>', 'homelessness' and 'digital access' in socio-economic factors</li> <li>• include 'transport and access' in the built environment section.</li> </ul>
HWC1: Health and Wellbeing of communities  HWC 1.1	Applicants should be encouraged to utilise the Healthy Streets approach and Hampshire Movement and Place Framework, as set out in policy DM2 of LTP4. These tools are intended to assist with the development of high-quality neighbourhoods by identifying accessible and inclusive interventions that support improved health and wellbeing of residents.  Recommend additional policy criterion to reflect the wellbeing and recreation benefits and objectives of the public rights of way network. <u>Development proposals will need to suitability mitigate and</u>

Section/ policy	Comment/ suggestion
	<p><u>compensate for adverse impacts to onsite and offsite countryside infrastructure (public rights of way).</u></p> <p>Suggest amendments to criteria b) and c):  b. ... <u>and providing suitable connectivity for the public rights of way network;</u>  c. <u>This includes the incorporation, protection, and enhancement of the public rights of way network;</u></p>
HWC1.1c	Criterion c) include ' <i>...that are inclusive and designed for a range of needs, interests and ages.</i> '
p.178 Table 7.1: Monitoring of enabling communities to live well	<p>Suggests strengthen policy and monitoring framework with reference to the JSNA (which forms a key part of the Integrated Impact Assessment).</p> <p>The indicator for the number of Health Impact Assessments submitted may not be robust enough to show benefits or outcomes. The use of post completion assessments such as Building for Healthy Life might be a better measure of health-related changes and mitigation.</p>
<b>08: Delivering Green Connections</b>	
p.180 para 8.2	8.2 include 'public health activities for prevention and early intervention of ill-health' into the health services statement.
DGC1 Infrastructure  DGC 1.1	<p>Infrastructure for sustainable transport should be available from first occupation to ensure that sustainable travel behaviours can be embedded, and use of the private car is not the only option for residents who occupy the site during the early phases of development.</p> <p>Suggest policy wording is strengthened to clarify that this means, in most cases, at first occupation.</p> <p>Policy DGC1 should include public rights of way infrastructure to ensure suitable obligations to mitigate and compensate development impacts on the network are sought, and that provision is made for local and regional public green spaces for countryside access, wellbeing, and recreation.</p> <p>Para 8.10 recommended text:  8.10 Infrastructure is a very broad term including roads and other transport facilities, <u>public rights of way</u>, flood defences, schools and other educational facilities, medical facilities, sporting and recreational facilities, open spaces, <u>and public green spaces.</u></p>

Section/ policy	Comment/ suggestion
	Emerging Infrastructure Delivery Plan should include the public rights of way network and public countryside sites such as parks, country parks, heritage sites, and other accessible green spaces.
DGC1 Infrastructure  DGC 1.2	<p>1.2 states that proposals must consider all the infrastructure implications of a scheme, not just those on the site or its immediate vicinity.</p> <p>A significant proportion of visitors to the Queen Elizabeth Country Park come from within the East Hampshire District. The County Council has identified proposed Local Plan site allocations that are within the visitor distance of Staunton Country Park and Queen Elizabeth Country Park. Increased housing development within the visitor catchment is likely to increase demand for these facilities and the associated cumulative impacts will need mitigating. To fund necessary infrastructure improvements at these country parks (as identified in the forward plans), developer contributions which meet the regulatory tests may be sought where this is supported by evidence of visitor numbers and pressure.</p>
DGC2: Sustainable transport	<p>The consideration of implications and needs should include insights and findings gathered through meaningful community engagement.</p> <ul style="list-style-type: none"> <li>• 8.25 should include 'wheeling' alongside walking and cycling</li> <li>• 8.27 <a href="#">Healthy Streets</a> principles should be applied against the LCWIP ambitions.</li> <li>• 8.32 include air quality benefits of reduced number of private car journeys</li> </ul>
DGC2: Sustainable transport	<p>The public rights of way network forms a significant part of the sustainable transport network, particularly in rural areas. It is a key asset for pedestrian, cycling and equestrian access to the countryside and between locations through the countryside in a safe and enjoyable way. It is fundamental to the equestrian economy that contributes to rural economies.</p> <p>Policy DGC2, and its supporting paragraphs, should include reference to the public rights of way network as follows;</p> <p>...b. provides attractive and well-designed walking and cycling networks with relevant supporting infrastructure that will improve the perceived safety and security of these modes. <u>This shall include protection and enhancement of the public rights of way network and provision to horse-riding infrastructure where relevant;...</u></p> <p>g. does not have a severe impact on the operation of, safety of, or accessibility to the local or strategic highway networks, <u>including the public rights of way network;</u></p> <p>h. mitigates impacts on the local or strategic highway networks, <u>including the public rights of way network, caused from the</u></p>



Section/ policy	Comment/ suggestion
	<p>development itself and/or the cumulative effects of development, through the provision of, or contributions towards, necessary and relevant transport improvements <u>onsite and offsite</u>; and...</p> <p><u>Para 8.36</u></p> <p>It is essential that new development integrates with existing sustainable transport networks and provide safe, suitable access and connections to the walking, cycling and public transport infrastructure, as well as providing new linkages to these, where required. It is necessary for all users' needs to be represented in the design of new streets and access points for new development, <u>including users of the those of the public rights of way network.</u></p> <p>Development will provide a safe and secure on-site movement layout that minimises conflicts between road traffic, cyclists and pedestrians, whilst considering the needs of people with disabilities, and also accommodating the efficient delivery of goods, materials and supplies.</p>
<p>DGC2: Sustainable transport</p> <p>Para 8.39-8.40</p>	<p><u>Para 8.39 – request inclusion of ‘or public rights of way’ at the end of the first sentence.</u></p> <p>Suggest additional text at the end of the para: <u>This includes for the public rights of way network. Any assessment, and plan, must include relevant public rights of way.</u></p> <p>Para 8.40- request inclusion of PROW networks with reference to the Local Highway Authority as a partner.</p>
<p>DGC2: Sustainable transport (General-inclusivity)</p>	<p>Suggest expanding inclusivity where Plan mentions walking and cycling, with reference to “wheeling”. 'Walking and wheeling' represents the action of moving as a pedestrian, whether or not someone is walking or wheeling unaided or using any kind of wheeled mobility aid, including wheelchairs, mobility scooters, walking frames, prams or buggies.</p>
<p>Figure 1.2 p.17</p>	<p>There is a noticeable absence of key train routes within the Regional Map which should be added to reinforce the sustainable transport options within the region and the policy framework.</p>
<p>DGC4 Protection of Community Facilities</p> <p>DCG4.2 Marketing Requirements</p>	<p>The County Council own and manage a vast number of buildings and land to deliver its statutory functions. Policy DGC4 has important implications for the rationalisation of the County Council's estate. This may sometimes result in the 'necessary loss' of particular community facilities (such as libraries) in County Council ownership, in order to reinvest proceeds of sale in local service improvements.</p> <p>The County Council's service improvement programmes have strict timeframes and budget funding. A mandatory 12-month marketing</p>

Section/ policy	Comment/ suggestion
	<p>exercise would cause additional delay and costs which could directly impact on the delivery of the public services.</p> <p>Request that the emerging Policy DGC4 is amended to include sufficient flexibility to accommodate the unique role and function of public service providers and their need for managed change.</p> <p>Suggest amendments to the draft policy wording: If either of the criteria are satisfied... 'only permitted if: it is no longer needed, and alternatives are easily accessible without causing unreasonable reduction or shortfall in the local service provision; and <u>or</u> it can be demonstrated through a rigorous marketing exercise that: i) the use is no longer viable, and ii) all reasonable efforts have been made to retain it, and there is no alternative viable use of the land or facility as a community facility Details of the marketing requirements are set out in Appendix D.'</p>
<p>Policy DGC5: provision and enhancement of open space, sport and recreation</p>	<p>DGC 5.1: Request requirement for applicants to demonstrate that off-site provision can be accessed via existing high-quality walking and cycling infrastructure or frequent public transport service or makes a contribution towards providing such links.</p> <p>Public Health can advise on the rationale for ensuring provision is designed with input from the local communities, with a focus on inclusivity.</p>
<p><b>9. Homes for All</b></p>	
<p>H1 Housing Strategy</p>	<p>9.26 refers to a land Availability Assessment. The LLFA note a thorough assessment of flood risk from all sources has been undertaken within the sequential test document covering all available sites. However, it is not clear how the assessment findings have informed the site allocation selection. Several sites have sizable areas at risk of various sources of flooding (e.g. ALT6 Land at Wilsom Road, Alton) and it is not clear from the sequential test, that there were not alternative sites at a lower risk where these could be accommodated.</p> <p>The sustainability justification column has not been completed within the sequential test. This column could be used to indicate whether a site has been allocated and why a site has been chosen despite not wholly being in Flood Zone 1 with a low risk of flooding from all sources.</p>
<p>Para 9.33</p>	<p>Residents should be enabled to <a href="#">live longer better</a> and remain independent for as long as possible by adapting homes and the ability to access suitable accommodation that meets their needs. There is guidance under <a href="#">HAPPI guidance</a> and through the <a href="#">Royal Town Planning Institute (RTPI)</a> on the design of care homes for health and planning for an ageing population.</p>

Section/ policy	Comment/ suggestion
<b>10: Supporting the local economy</b>	
<p>E2 Maintaining and improving employment floorspace</p> <p>Appendix D Marketing Requirements</p>	<p>The County Council as a landowner and public service provider has an on-going need to review and, if necessary, rationalise surplus facilities as part of wider strategies to improve services. The County Council own and manage a vast number of buildings and land to deliver its statutory functions. Rationalisation activity sometimes result in the ‘necessary loss’ of particular employment buildings (such as administrative offices in association with the abovementioned public services).</p> <p>The County Council’s service improvement programmes have strict timeframes and budget funding. The mandatory 12-month marketing exercise would cause additional delay and costs which could directly impact on the delivery of much needed public services.</p> <p>Request that the emerging Policy E2 provides sufficient flexibility to accommodate the unique role and function of public service providers and their need for managed change.</p>
<p>E3: Rural Economy</p> <p>E3.1</p>	<p>Recommend an additional bullet point is added to Policy E3.1:</p> <p><u>the public rights of way network and should not result in an adverse impact on that network, rather it should provide protection and enhancement, both onsite and offsite, including to the safe public priority use of the public rights of way network where relevant. This may include suitable and enhancing diversions. Developments that propose intensification of motorised vehicle use of public rights of way will not be supported due to public safety impacts. Alternative access routes shall be proposed.</u></p> <p>No reference is made in the wording of Policy E3 or its supporting text regarding equestrians and the equestrian industry’s contribution to the rural economy. The equestrian users and equestrian industry are dependent on a connected PROW network (particularly bridleways).</p>
<p>E4 Retention, provision and enhancement of tourism uses</p>	<p>Suggest additional point be added to Policy E4.2:</p> <p><u>d. the development mitigates and compensates any adverse impacts to public green and transport infrastructure, such as intensification of the use of PROW, sensitive green spaces, or Country Parks. This may include onsite and offsite obligations including contributions.</u></p> <p>The County Council also recommend additional wording to para 10.56:</p>

Section/ policy	Comment/ suggestion
	<p>Given the propensity for tourism related development to be located in close proximity to the South Downs National Park or near internationally designated sites, there is potential for proposals to have an adverse effect through increased recreational disturbance. <u>This can be notable for the PROW network and public green space.</u></p>
<p>DM11 amenity DM11.1</p>	<p>The County Council recommend adding the following wording to DM11.1:</p> <p>11.1 Development will only be permitted where it:</p> <ul style="list-style-type: none"> <li>a. does not have a significant adverse impact on the amenity of nearby buildings, spaces <u>and public rights of Way;</u></li> <li>b. provides acceptable standards of amenity for any existing and future users and occupiers of the development site; and</li> <li>c. where possible, contributes to improvements in the amenity of public spaces <u>and public rights of Way.</u></li> </ul>
<p>DM13 Air Quality</p>	<p>The <a href="#">JSNA</a> shows that air quality is poorest in the South of the District, with other pockets in urban centres. Mitigations should seek to reduce these areas of poorest quality whilst also ensuring new developments do not cause other areas to worsen. The Local Plan should seek to address inequalities in health outcomes from poor air quality and the County Council can provide data and evidence to inform this.</p>
<p>DM17 Backland development b and c</p>	<p>Proposals for backland development need to include protection and enhancement of PROW, and should not intensify vehicular use of PROW.</p> <p>Recommended additional wording to DM17.1:</p> <ul style="list-style-type: none"> <li>b. the relationship between buildings within and outside the site ensures that the privacy and amenity of existing and future residents are preserved, <u>as well as that of the PROW network;</u></li> <li>c. the means of access is appropriate in size and design to accommodate vehicles and pedestrians safely and would not result in harm to the amenities of adjoining residents from noise and disturbance from vehicle movements. <u>The use of PROW for vehicular access, for construction or occupation, is unacceptable other than in exceptional cases;</u></li> </ul>
<p>DM19 Conversion of an existing agricultural or other rural building to residential use</p>	<p>Suggest additional point be added to Policy DM19.1:</p> <p><u>X. the scheme assesses any impacts to the PROW network and demonstrates adequate protection and enhancement through mitigation and compensation proportional to those impacts. The use of PROW for vehicular access, for construction or occupation, is unacceptable other than in exceptional cases;</u></p>

Section/ policy	Comment/ suggestion
DM21 Farming & forestry development and diversification	<p>Recommend additional text:</p> <p>c. the traffic generated by the development would not be of a type or volume that, in itself or cumulatively with existing or planned uses, would require highway improvements, <u>including to PROW</u>, that would harm the character of <u>PROW</u>, rural roads, particularly narrow or sunken lanes;</p> <p><u>g. they protect and enhance the PROW network where relevant. The use of PROW for vehicular access, for construction or occupation, is unacceptable other than in exceptional cases;</u></p>
Policy DM22 Equestrian and stabling development	<p>The County Council recommend the following additional paragraph be added:</p> <p><u>11.XXX Equestrian businesses and horse riding is commonly dependant on the PROW network (excluding Footpaths). The Hampshire County Council Countryside Access Plan encourages access to the countryside for equestrians as it does for walkers and cyclists. Therefore, proposals coming forward should consider their access and impact on the PROW network. The use of PROW for vehicular access, for construction or occupation, is unacceptable other than in exceptional cases.</u></p> <p>The County Council recommend the following proposed additional text be added to this policy:</p> <p>c. access, manoeuvring and parking provisions are acceptable, and the traffic generated by the development, or cumulatively with existing or planned uses, would not be of a type or volume that would require highway improvements that would harm the character of <u>PROW</u>, rural roads, particularly narrow or sunken lanes. <u>The use of PROW for vehicular access, for construction or occupation, is unacceptable other than in exceptional cases;</u></p> <p>d. development is well-located in relation to infrastructure that is suitable for the safe exercising of horses, including <u>bridleways, restricted by-ways, byways open to all traffic and other off-road tracks</u>. Connection to PROW is considered beneficial. The scheme will <u>protect and enhance the PROW network where relevant. The scheme should assess any impacts to the PROW network and demonstrates adequate protection and enhancement through mitigation and compensation proportional to those impacts – both onsite and offsite;</u></p> <p>e. there is no significant adverse impact on the amenity of nearby properties, <u>or the PROW network</u>, including as a result of increases in traffic generated by the development; and</p>

Section/ policy	Comment/ suggestion
<p>DM23: Shopping and Town Centre Uses</p> <p>DM 23.2</p>	<p>Part b. of policy DM 23.2 seems only to be applicable to outside of centre locations that are in close proximity to the identified centres. For those sites that are entirely separate from identified centres there should be a requirement to demonstrate how the site is connected via sustainable modes to trip origins e.g. people's homes, rather than just to the identified centre.</p>
<p>Section 12 Site Allocations (Flood Risk Assessment)</p>	<p>Flood Risk Assessment: A level 2 SFRA (Exception Tests) has been produced (dated November 2023) and only three sites have been addressed: AL005 Brick Kiln Lane, Alton, WHI020 (W&amp;B2) Land at the Former Bordon Garrison, W0R004 (ALT6) Land at Wilsom Road, Alton.</p> <p>The LLFA notes that information has not been provided within the Level 2 SFRA showing the land take for each of the sites assessed and it is not clear how the conclusions of acceptability within the Level 2 SFRA has been arrived at. The land take information should be included to support the findings. The County Council's Site Allocation SuDS Land Take Calculator can be used to quickly produce a high-level estimate of the developable area of the site and can even take account of the area within the Flood Zones and other sources of flooding.</p> <p>Current government guidance recommends that Level 2 SFRAs are triggered by all sources of flooding. The LLFA has identified several sites which would benefit from inclusion in the level 2 SFRA, including, sites where there is a surface water overland flow routes running through the middle of the site. The County Council can advise on which sites to include.</p>
<p>Section 12 Site Allocations (drainage)</p>	<p>Infrastructure Requirements- Reference to on-site drainage is useful.</p> <p>Recommended that alternative drainage outfall locations that are easier to identify at this stage are considered as well as infiltration. For instances for example where infiltration sustainable drainage systems are not viable.</p> <p>Best practice and requirements for site allocations is set out in August 2023 guidance on catchment management plans online at: <a href="https://documents.hants.gov.uk/flood-water-management/HCC-CMP-Local-Plan-Guidance-Final-for-publishing-v2.pdf">https://documents.hants.gov.uk/flood-water-management/HCC-CMP-Local-Plan-Guidance-Final-for-publishing-v2.pdf</a> At this stage plans are encouraged to identify sites that are located near a surface water sewer or watercourse. Site allocations that are not near a watercourse or a surface water sewer may not be deliverable in practice if infiltration proves undeliverable.</p> <p>The LLFA have identified several sites which are completely reliant on infiltration to drain, but without supporting evidence that this will</p>

Section/ policy	Comment/ suggestion
	work in practice. Applicants need to ensure that the drainage solution is acceptable to the LLFA. The County Council can signpost to BGS borehole datasets which give an indication of local groundwater levels and geology.
Section 12 Site Allocations (Education)	Infrastructure Requirements - the Local Education Authority has detailed what the likely pupil yield would be for both primary and secondary phase, what schools would be impacted, and any likely expansions or new schools required associated with the housing allocations contained in the draft Local Plan. They have also detailed whether a new school travel plan would be required or an update to existing ones in following collaboration with the County Council. The full details are set out in <b>Annex 1</b> .
Section 12 Site Allocations (Safeguarding Resources)	<p>'Strategic Environmental Constraints' maps (various)- The Minerals Safeguarding Area, as defined by Policy 15 (Safeguarding – mineral resources) of the HMWP, has not been included. The mineral safeguarding is a strategic constraint to new development, and therefore, request that the Minerals Safeguarding Area is added to these maps.</p> <p>The NPPF requires planning authorities to define Minerals Safeguarding Areas and adopt policies so that, 1) known locations of mineral resources of local and national importance are not needlessly sterilised by non-mineral development, 2) if it is necessary for non-mineral development to take place, the prior extraction of minerals, where practicable and environmentally feasible, is encouraged.</p>
Section 12 Site Allocations (all)	<p>Hampshire County Council's Local Transport Plan 4 (LTP4) marks a significant shift in how planning of our transport networks and local streets should be undertaken. The Highway Authority expects proposals for new development to be guided by the principles and policies contained in LTP4 and related guidance.</p> <p>The transport policy team can provide detailed advice on how to utilise LTP4 in formulating site specific policies as the Local Plan emerges, with specific reference to:</p> <ul style="list-style-type: none"> <li>• the vision for a carbon neutral, resilient and inclusive transport system designed around people.</li> <li>• Design, street design and masterplanning (Road User Utility Framework, Movement and Place Framework and, Carbon Management Hierarchy Healthy Street approach)</li> <li>• Demonstrating how the need to travel has been reduced and sustainable transport opportunities embedded in the design.</li> <li>• How suitable infrastructure will be used to support the ability for people to live well without needing to own a car, such as</li> </ul>

Section/ policy	Comment/ suggestion
	<p>mobility hubs, bike share, car clubs and facilities to enable good public and active transport links.</p> <ul style="list-style-type: none"> <li>• Maximising the potential for pupils to walk and cycle, make provision for attractive routes through the wider development (including links to surrounding areas) and are designed to accommodate school buses where required</li> <li>• priorities identified in the Local Cycling and Walking Infrastructure Plan (LCWIP) covering the area.</li> </ul>
Section 12 Site Allocations (all)	<p>There is a reduced focus on junction capacity improvements within the approach of LTP4. Applicants should be required to mitigate the transport impacts of the development through appropriate measures both on and off site, including via developer contributions. Only where specific junction improvements have been identified as a requirement should these be referenced in the site allocations section.</p>



## Section 12: Site Allocations: sites with emerging planning applications

Allocation	Planning Ref	Highway Authority and Minerals & Waste Planning Authority comments	Policy suggestions
ALT5 - Land at Travis Perkins (Mounters Lodge part)	59923  (26 dwellings)	<p>The site needs to incorporate an access strategy which integrated with the proposed LCWIP network at Chawton Park Road and the Butts.</p> <p>The site needs to provide improvements to the Public Right of Way towards Chawton Park Road, as whilst it offers a public right to the facilities on Chawton Park Road it is currently an unmade track unsuitable for all users.</p> <p>There will need to be a new Traffic Regulation Order to support vehicular access to the site.</p> <p>The County Council will seek off-site contributions for: Resurfacing of Chawton Byway Open to All Traffic 502 and Alton Restricted Byway 506 (Writer's Way route).</p>	<p>Request that the following wording, or similar, be added:</p> <p>'Proposals for development of this site should include an access strategy which demonstrates integration with the proposed LCWIP network and existing PROW network'</p>
ALT7- Land at Lynch Hill	49776/006  (21,000sqm employment floorspace)	<p>Provision of a new access via Montecchio Way is not in accordance with Policy DM2 of LTP4 and a preferred access arrangement would be via Waterbrook Road. However, this is an unadopted road with significant on street parking that would need to be managed.</p> <p>Since the application was assessed, there is a new signalised junction between Mill Lane and Montecchio Lane. The proximity of the two junctions needs to be</p>	<p>Request that the following wording, or similar, be added:</p> <p>'Applicants should provide evidence to demonstrate how the site can be safely accessed for all modes, in line with the policies contained within LTP4'</p> <p>'Applicants should aim to maximise the prior extraction of mineral resources on this site,</p>

Allocation	Planning Ref	Highway Authority and Minerals & Waste Planning Authority comments	Policy suggestions
		<p>assessed against the current standards and further modelling and design work is required to confirm that the junction remains suitable.</p> <p>Development will need to facilitate a safe and dedicated active travel crossing on Mill Lane and improvements to the junction of Newmans Lane/Anstey Mill Lane to connect with emerging LCWIP network and allow safe access by active travel modes.</p> <p>Further information is also required to demonstrate that vehicular access to Waterbrook Road is achievable. This is also the only direct pedestrian and cycle access into the development and will therefore need to suitably cater for these movements.</p> <p>The site abuts the Neatham Down strategic site and requirements to facilitate linkages between the developments to facilitate sustainable access should be set out.</p> <p>The Hampshire Minerals and Waste Plan safeguards potential mineral resources through Policy 15 (Safeguarding – mineral resources). Where a potential development site lies within the Mineral Safeguarding Area (MSA) and is over 3 hectares in size, the site should be assessed for the prior extraction of the underlying minerals.</p>	<p>in line with the policies of the Hampshire Minerals and Waste Plan. A Mineral Resource Assessment is required to be submitted to the Minerals and Waste Planning Authority as part of any application to develop this site.'</p>

Allocation	Planning Ref	Highway Authority and Minerals & Waste Planning Authority comments	Policy suggestions
Whitehill and Bordon W&B1-3		<p>This is referred to as having planning permission however the red line covers the areas of TC1 and TC2 as well as the health hub. Whilst Outline consent has been granted for the whole area the details within the Reserved Matters applications around access and movement around the town centre are not all agreed. Some principles have been set within the TC1 reserved matters permission however ongoing movement and place strategies are needed to ensure integration of these areas locally.</p> <p>This site makes up part of the current Hybrid Planning Application and therefore other than integration into the existing phases of the development within the BOSC area the Highway Authority has no comments on this site .</p>	<p>Request that the following wording, or similar, be added:</p> <p>‘Further development, in addition to that which has been granted outline consent, should make reference to the reserved matters principles agreed for TC1 to ensure integration between parcels of development’</p>
W&B4- Louisburg Residential Extension		<p>The Highway Authority has no objection to the principle of a small extension of the Louisburg residential area.</p> <p>Artillery Drive is a narrow carriageway and achieving a new access onto such a road design may be difficult for the proposed quantum. Access proposals should be considered to ensure they are deliverable considering extents of adopted highway.</p>	<p>Request that the following wording, or similar, be added:</p> <p>‘Applicants should provide evidence to demonstrate how the site can be safely accessed for all modes, in line with the policies contained within LTP4’</p>
LIP3- Land at Chiltley Farm	22789/007	Although the site is located in a sustainable location, enhancements to pedestrian, cycle and public	Request that the following wording, or similar, be added:

Allocation	Planning Ref	Highway Authority and Minerals & Waste Planning Authority comments	Policy suggestions
	(100 dwellings)	transport provision will be required as part of the development.	'Development of this site should contribute towards the improvement of the walking, cycling and public transport network in the vicinity of the site in order to maximise opportunities for sustainable travel'
FMS2- Land Rear of 97-103 Blackberry Lane	20252/004 (35 dwellings)	Site is likely to be reliant on trips being made by car due to distance from services.  Provision of pedestrian crossing facilities and improved bus waiting facilities to the east of the site access to be provided by the developer.  Further junction modelling to be undertaken by the developer.	The County Council request that the following wording, or similar, be added:  'Development proposals for this site should provide evidence to demonstrate the impact that additional car journeys will have on the local highway network. Developers will be required to provide a contribution towards improving sustainable transport infrastructure in the vicinity of the site'.
BEN1- Land West of Hole Lane	55417/009 (12 dwellings)	Vehicular access through the development to the east would be supported, however it should be noted that Somerset Fields is not adopted public highway.  Requirement for developer to provide pedestrian and cycle infrastructure improvements on Hole Lane and on connecting routes into Bentley Village centre.	The County Council request that the following wording, or similar, be added:  'Development of this site should contribute towards the improvement of the walking, cycling and public transport network in the vicinity of the site in order to maximise opportunities for sustainable travel'
CTN1- Land at Parsonage Farm	59998 (6 dwellings)	The access and roads/ footways within the development would not be adopted by the Highway Authority.	The County Council request that the following wording, or similar, be added:

Allocation	Planning Ref	Highway Authority and Minerals & Waste Planning Authority comments	Policy suggestions
		Management of public parking spaces within the development and refuse collection to be considered by the development.	'Proposals for development of this site should be supported by a detailed parking management plan and access strategy for refuse collection vehicles'
LOV1- and Rear of 191-211 Lovedean Lane	55406/005 (30 dwellings)	The site is considered to be in a sustainable location, however there are shortfalls in pedestrian facilities within the vicinity of the site.  Pedestrian improvements required along Lovedean Lane with funding from the developer.	The County Council request that the following wording, or similar, be added:  'Development of this site should contribute towards the improvement of the walking network in the vicinity of the site in order to maximise opportunities for sustainable travel'

## Section 12: Proposed Site Allocations: Policy comments

Local Plan section	Comment/suggestion: Four Marks
p.422 Four Marks	<p>Suggest that the section on Four Marks accurately characterises the traffic levels and walking and cycling environment of this settlement.</p> <p>Four Marks is a dispersed low-density village bisected by the A31 with relatively constant flows of traffic throughout the day and HGVs representing approximately 5% of vehicle movements. This makes it difficult and unpleasant to cross from one side of the village to the other creating severance for residents wishing to walk, cycle or use public transport, and discouraging using these modes. Whilst Four Marks has a cluster of key facilities and services fronting the A31 and the adjoining Lymington Bottom Road, it cannot be described as a vibrant 'village centre' predominately because of the severance and traffic dominance created by the road.</p> <p>The desirability of driving further afield for facilities (e.g. larger supermarket) results in increased congestion and traffic delays. Traffic dominance can be reduced by developing an integrated transport and land use masterplan and vision for the village. The provision of new active travel infrastructure alongside place making initiatives will reduce the severance created by the A31 and this in turn will facilitate the provision of a greater number of local facilities and services in the village which in turn will result in improved self-containment and internalisation of trips within the village. Four Marks is a village where there is a need to reassess the balance of priority between traffic and pedestrians in accordance with the Movement and Place Framework in the adopted Local Transport Plan (LTP4).</p> <p>LTP4 includes Policy C1 which commits to using the Road User Utility Framework to develop the Movement and Place Framework to ensure that streets serve all users in a balanced way. The Movement and Place Framework identifies the relative balance between 'movement' and 'place' in different locations and informs decisions about the types of interventions required and the land uses that work best in these locations. It will look for opportunities to improve the 'place' function in villages, town centres and neighbourhoods, including re-allocating road space and managing vehicle access in specific locations.</p>

<b>Local Plan section</b>	<b>Comment/suggestion: Four Marks</b>
	LTP4 also commits to embracing the Healthy Streets Approach which adopts a whole street approach to create environments that feel attractive, comfortable, and safe for walking and cycling, regardless of ability, confidence, age and disability, leading to a healthier environment where people are able to choose to walk, cycle and use public transport more often.
Figure 12.21 housing in Four Marks	The Highway Authority expect the promoters of any development proposals within Four Marks to work together on the development of a Movement and Place Masterplan for the village.
Figure 12.22 proposed sites	The Highway Authority require assessment work is undertaken to support allocations in Four Marks, based on opportunities to significantly improve sustainable transport provision for all modes (walking, cycling and public transport) to determine if there are remaining significant residual impacts which would require consideration of capacity improvements.

<b>Local Plan section</b>	<b>Comment/suggestion: ALT1 – Land at Brick Kiln Lane &amp; ALT4 Land at Whitedown Lane</b>
p.340 / p.347 (proposed No. of homes)	ALT1 - Site was previously promoted for 200 dwellings, and it is not clear from the draft Local Plan why the allocation has been reduced to 150 dwellings. ALT4- the above average accessibility score in EHDC's Accessibility Study indicates that the density of this site can be increased and the number of dwellings maximised. The County Council encourages higher density on all allocated sites where this supports accessibility via sustainable modes.
p.342 /p.349 Infrastructure Requirements	ALT1 - Site access is expected to be achieved from a new roundabout at or in the vicinity of the A339/ B3349 junction depending upon further feasibility studies and assessment of the site constraints to be undertaken by the applicant.

<b>Local Plan section</b>	<b>Comment/suggestion: ALT1 – Land at Brick Kiln Lane &amp; ALT4 Land at Whitedown Lane</b>
(road network)	<p>ALT4 - Further feasibility work is required to determine where vehicular access for this site can be achieved off the A339 Basingstoke Road. Given the level differences between the site and the public highway at the A339/B3349 junction it is uncertain whether an access can be achieved here.</p> <p>ALT1 - Pedestrian /cycle crossing provision would be required on certain arms of roundabout to facilitate active travel access west along the A339 towards Beech, east along the B3349 providing a route into the town centre and south along Pertuis Avenue A339 towards the leisure park.</p> <p>ALT4 - an improved ped/cycle/active travel crossing facility must be provided on Pertuis Avenue where existing bridleway crosses the A339, with the provision of LTN01/20 compliant infrastructure connecting with Highridge/Whitedown Lane. An upgrade of the existing bridleway to the west of Pertuis Avenue will also be necessary.</p> <p>It will be necessary to reduce severance caused by the A339 and B3349 through new active travel crossings and dedicated route infrastructure (to enable a reduction in local trips needing to be made by private vehicle).</p>
Infrastructure Requirements (walking and cycling)	<p>Proposals would need to be supported by off-site contributions towards funding emerging Local Cycling &amp; Walking Infrastructure Plan (LCWIP) network proposals:</p> <ul style="list-style-type: none"> <li>• A Primary Route alignment along Basingstoke Road to enable residents of the development to access the town centre by active travel modes</li> <li>• a Secondary Route alignment along Pertuis Avenue/Whitedown Avenue to enable residents of the development to access the leisure centre via active travel modes – includes proposals for a junction redesign at the Chawton Park Road/Whitedown Lane junction.</li> </ul>
p.341/ p.349 Access (opportunities)	<p>Consideration of site access needs to be undertaken in collaboration with the promoters of both sites, to ensure funding is available to deliver the necessary A339/B3349 junction improvements (mitigation) and active travel route improvements required.</p>



Local Plan section	Comment/suggestion: ALT1 – Land at Brick Kiln Lane & ALT4 Land at Whitedown Lane
	A combined access and the A339/B3349 junction would limit the requirement for new access points onto the A339 in accordance with the DM2 policy of LTP4.
(p.349) Infrastructure requirements - PROW	ALT4 - To mitigate impacts on the PROW network, off-site contributions would be required towards surface improvements to Beech Bridleway 712 and Beech Footpath 714. Improvements will be required on-site to create Bridleway connection to Beech Bridleway 712 through site into Bushy Leaze Woods, possibly in conjunction with Land at Brick Kiln Lane site, including pedestrian and cycle crossing over A339.

Local Plan section	Comment/suggestion: ALT3 – Land adjacent to Alton Sewage Treatment Works
p.356 constraints	<p>Site lies directly adjacent to the safeguarded Alton Wastewater Treatment Works and falls within the safeguarded buffer zones of Waterbrook Road Concrete Batching Plant, operated by Kendall Group and Waterbrook Road, Alton, operated by Grey Fox Recycling Ltd. See adopted <i>Minerals and Waste Plan</i> Policy 16 (Safeguarding – minerals infrastructure) and Policy 26 (Safeguarding – waste infrastructure). These safeguarded sites should be included as allocation constraints, along with a requirement to consult the County Council as the Minerals and Waste Planning Authority.</p> <p>Applicants required to demonstrate how proposals do not constrain existing or allocated minerals or waste infrastructure.</p>

Local Plan section	Comment/ suggestion: ALT6 - Land at Wilsom Road
p.354 Access	To enable safe pedestrian access to the site for visitors and employees the development will need to facilitate new footway provision, and an informal pedestrian crossing facility on Wilsom Road in vicinity of the site. To

	improve road safety and facilitate the provision of a new vehicular access on this section of Wilsom Road the 40mph speed limit should be reviewed.
p.353 Hangers Way	<p>The Hangers Way long distance path runs along the northern boundary of the site via a PROW. The development will need to facilitate the provision of a high-quality path appropriate for use by pedestrians and potentially cyclists (either upgrade of the existing PROW or provision of new route through the site) over the River Wey and under the A31 between Wilson Road and Neatham Down that is aligned with the route of the Hangers Way<sup>3</sup>.</p> <p>The County Council seek off-site improvements to the footbridge at the south of the site and the resurfacing of Alton Footpath 40/Hanger's Way.</p>
p.353 Flood risks	Partially within Flood zones 2 and 3- for such sites a much more in-depth level 2 SFRA may be needed to demonstrate that the development can be safely developed without increasing offsite flood risk. W0R004 (ALT6) Land at Wilsom Road, Alton is a highly constrained site may be difficult in this regard without detail modelling.

<b>Local Plan section</b>	<b>Comment/suggestion: ALT8- Land at Neatham Manor Farm</b>
p.358 Approx 1000 homes and other uses	The Highway Authority has to date not been involved with this emerging allocation, and advice on highways and transport has not been sought. Significant highways and transport issues have been identified with this site, along with a lack of evidence of a genuine choice of transport modes, and no transport assessment to review. The Highway Authority is currently unable to support the allocation of ALT8 Land at Neatham Manor Farm, and has concerns surrounding the accessibility of the site for all modes. The site is in relative proximity to Alton, but it is physically severed by the A31 meaning it is disconnected from the town.
p.359 constraints and	Given the distance between the site and the existing primary schools in Alton and the severance created by the A31 it will be essential for a new primary school to be built on the site. The provision of safe and accessible routes to secondary and special schools for active sustainable modes would be a challenge to deliver, even with

<sup>3</sup> The Hangers Way [The Hangers Way | Hampshire County Council \(hants.gov.uk\)](https://www.hants.gov.uk/the-hangers-way)

Local Plan section	Comment/suggestion: ALT8- Land at Neatham Manor Farm
opportunities (access)	<p>an on-site primary school due to the nature of the road network along Montecchio Way and no crossing provision at London Road on the desire line.</p> <p>Active travel access would need to be secured over the A31 via the bridge to Waterbrook Way for this site to be sustainable. If public access over the bridge can be secured, then the route from the bridge to the town centre is through an industrial estate road with high volumes of HGVs raising road safety issues. This part of the network is outside the control of the Highway Authority and is a private street, which gives rise to concerns of access rights outside the redline boundary of this site and the adjoining ALT7 proposals. There may be opportunities to link up with the wider LCWIP network in Alton if safe active travel routes and crossings can be effectively implemented. Without evidence that the development has secured permission to allow pedestrians and cyclists to use the route the Highway Authority cannot support this site allocation. The provision of this link and single active travel route alone would not make the site fully accessible for sustainable modes and it would not address the safe routes to school issue.</p>
p.359 constraints and opportunities (pedestrian routes)	<p>There is currently no footway or cycle lane provision on Montecchio Way between the A31 roundabout and Mill Lane, this is a distance of 250 metres and includes the bridge structure over the River Wey. The topography of the land either side of the carriageway, along with likely ecological issues, could also make introducing any provision here unachievable. The route is subject to high volumes of vehicular traffic including HGVs. The Highway Authority would need to be satisfied that this provision could be met in accordance with LTN1/20 guidance as part of the evidence base to support any allocation here.</p> <p>The County Council is supportive of converting the existing farm vehicular access into a non-motorised multi-user connection between the site and Alton; any planning application must also include this proposal, confirming that public access has been secured in perpetuity, to be supported.</p>
p.359 constraints (omission)	<p>Request that the following wording, or similar, be added to this proposed site allocation as it has been identified as having minerals as a constraint.</p> <p><u>'Applicants should aim to maximise the prior extraction of mineral resources on this site, in line with the policies of</u></p>

Local Plan section	Comment/suggestion: ALT8- Land at Neatham Manor Farm
	<p><u>the Hampshire Minerals and Waste Plan. A Mineral Resource Assessment is required to be submitted to the Minerals and Waste Planning Authority as part of any application to develop this site.'</u></p>
p.361 Indicative concept	<p>Proposals for vehicular access to the site are shown to be from a new arm off the existing A31 roundabout which provides access to Alton via the B3004 Montecchio Way. No evidence has been provided to show that this vehicular access arrangement will be workable and acceptable. The proposal would need to be supported with evidence that this access arrangement will not have negative impacts on traffic movements on the A31 Strategic Road Network and it will be a safe and suitable access for all users. Montecchio Way already experiences some capacity issues which will be worsened through the introduction of the additional access point and proposed scale of development. Any infrastructure improvements here would need to ensure that existing traffic flows and movements on the B3004 or the A31 are not negatively impacted.</p> <p>The indicative concept indicates one vehicular access to the site from the A31 roundabout. A singular vehicular access into a development of 1,000+ homes is unlikely to be acceptable to the Emergency Services and the impacts will be severe if this access is ever blocked or closed. An additional secondary vehicle access onto the A31 is unlikely to be supported by the Highway Authority, and the applicant would need to demonstrate that the strategic flow of traffic on the A31 is prioritised and not compromised per policy DM2 of LTP4.</p> <p>The indicative concept indicates a proposed active travel crossing on the A31, which the applicant would need to demonstrate to the satisfaction of the Highway Authority that this is acceptable. Assuming it was accepted in principle, any at grade crossing provision through controlled means would need to be incorporated at the A31/B3004 roundabout works through signalisation. Even if the crossings can be achieved it will only get pedestrians and cyclists to Montecchio Way which is still some distance to the town centre with its services and amenities, but would support pedestrian access to the out-of-town shopping provision provided on Mill Lane.</p>
p.361 Accessibility	<p>Proposals for an adequate bus service provision for this site are considered unrealistic and unlikely to be commercially viable, suggesting it will be impossible to offer a genuine choice of transport modes for residents. Evidence should be provided of positive engagement with the bus operator to demonstrate the commercial</p>

Local Plan section	Comment/suggestion: ALT8- Land at Neatham Manor Farm
	viability of the bus service, without the need for any subsidy (from the County Council or developer contributions or any other source).
p.361 Infrastructure Requirements	<p>To mitigate impact on the PROW network, applicants may be required to contribute towards the extension of internal pedestrian/cycle access out of site east across land between Binsted Footpath 3 and Clay's Lane/Wyck Lane (seeking to enhance active travel connections between Alton and Bordon, creating a link to Clay's Lane/Wyck Lane, from which users can pass along Forty Acres Lane and onto the Bridleway running south along Green Lane, across the B3004 and into Shortheath Common, then down Gibbs Lane into Bordon). Seek to enhance active travel connections between Alton and Alice Holt Forest, via Forty Acres Lane, the Bordon Cycle Route, and Binsted Bridleway 62.</p> <p>Contributions would also be required to mitigate impacts on the PROW network in order to create pedestrian links on and off site between the existing farm access road on east side of A31 south to the Writer's Way and B3004.</p> <p>The protection and enhancement of Binsted Footpath 1 within site is required:</p> <ul style="list-style-type: none"> <li>• upgrading route to Bridleway status between site access off A31 roundabout and point at which it crosses potential west-east pedestrian/cycle connection.</li> <li>• Surface improvements to accommodate the significant increase in user volume, including the section to be upgraded to Bridleway.</li> <li>• Route shall be protected and segregated from the built form by a green corridor.</li> </ul>

Local Plan section	Comment/suggestion: Whitehill and Bordon (including Lindford)
p.372 W&B1	This land is allocated for housing through Hybrid Planning Application (HPA) approval, and the Highway Authority is generally supportive of increases in density. However, increases beyond the HPA approval need to be assessed for the impact on the highway network. The HPA approval did not consider local impacts such as the Budds Lane/Station Road junctions and was more focused on the relief road benefits and wider larger

	<p>impacts outside the regeneration area. Further transport assessment work will be required to support any additional development / intensification.</p> <p>The provision of sustainable travel infrastructure around the regeneration area has been emerging and continues to evolve. Funding provision is however limited at present and shouldn't be assumed to be sufficient to accommodate the additional growth. Proposals for and development in addition to that secured through the previous HPA will need to demonstrate how the new development can link into the existing sustainable travel network, providing additional infrastructure or funding towards improvements as appropriate.</p>
W&B1 and W&B2 constraints	Support inclusion of minerals as a constraint in a number of the allocated sites of the draft Local Plan focussed in the Whitehill & Bordon area of East Hampshire.
Figure 12.8 p.367	The figure shows areas adjacent to Shortheath Comon and to the south of Broxhead Common as new Green Infrastructure Opportunities. It is not clear how this identification of green infrastructure opportunities will function to avoid impacts of protected habitats. The County Council in respect of its countryside sites encourage consideration of new development, and associated visitor pressures to these protected sites. Impacts on Shortheath Common and Broxhead Common may require mitigation (including for habitat enhancement and alongside PROW Connections to the Green Grid Green Loop).
W&B2- Land at Former Bordon Garrison / W&B3 Residential Expansion	Connections onto the existing Oxney Drain would be fundamental as well as connecting into the Green Grid/Green Loop. Connections across to the western side of the A325 are also key to access employment and the Hogmoor Enclosure. The development parcel would also need to be consistent with the already permitted Phase 3 in facilitating a route appropriate for the use by buses should demand require that in the future, and off-road cycling facilities north/south connecting Havannah Way to Budds Lane and Station Road.
W&B5- North of Louisburg Employment Proposal	The electricity substation which has been approved within this red line should be set out as a constraint. Access proposals for wider employment have not been considered in detail as part of that application, but access from Hudson Road should be appropriate to accommodate some employment uses.

Local Plan section	Comment/suggestion: W&B7- Land at Hollywater Road and Mill Chase Road
p.386 Access	<p>If access is to be provided onto Hollywater Road, opportunities to reduce existing vehicle speeds on the road should be explored to improve safety of all road users accessing and egressing the site.</p> <p>Access from Mill Chase Road should be avoided so as not to add to conflict with the school operation. Opportunities for improvements to access the new town centre should be considered to support any application. Integration is also required to provide a route to the proposed and existing SANG provision to ensure usability for residents of the site and those within the immediate area. There is currently no footway provision on Hollywater Road so access for sustainable users will need to be considered.</p>
p.386 Constraints	<p>In accordance with the Hampshire Minerals and Waste Plan, the County Council suggest amended wording: <u>'Applicants should aim to maximise the prior extraction of mineral resources on this site, in line with the policies of the Hampshire Minerals and Waste Plan. A Mineral Resource Assessment is required to be submitted to the Minerals and Waste Planning Authority as part of any application to develop this site.'</u></p>

Local Plan section	Comment/suggestion: HDN1- Land at Woodcroft Farm
P395 Access and pedestrian links	<p>Vehicular access to this site would need to be achieved through the new Catherington Park development, however it is noted there are mature trees that may make this difficult, along with some of the new residential roads which are an unsuitable width to accommodate significant levels of additional vehicle movements.</p> <p>Vehicle access should not be provided to the north of the site as the rural and narrow nature of the road is not suitable for the traffic levels generated. Consideration should be given to the presence of existing rights of way (bridleways and footpaths), ensuring that routes are maintained and enhanced.</p> <p>Pedestrian links to local facilities at present are not direct and should be provided to enable direct and convenient pedestrian and cycle access from the development through the bird estate to the school and community centre.</p>

p.396 Infrastructure requirements	Subject to the necessary regulatory tests being met, the County Council will seek off-site obligations for surface improvements to Horndean Byway Open to All Traffic 46; Havant Bridleway 1b; Horndean Bridleway 30; Denmead Bridleway 42.
p.395 constraints	Suggested additional wording as it has been identified as having minerals as a constraint:  <u>'Applicants should aim to maximise the prior extraction of mineral resources on this site, in line with the policies of the Hampshire Minerals and Waste Plan. A Mineral Resource Assessment is required to be submitted to the Minerals and Waste Planning Authority as part of any application to develop this site.'</u>

<b>Local Plan section</b>	<b>Comment/suggestion: HDN2- Land South of Five Heads Road</b>
p.397	The County Council query the above average score for this site in EHDC's Accessibility Study. The proposal for 118 homes is a significant quantum in an area which would be reliant on the private car. The Highway Authority has significant concerns regarding sustainability of this site and the lack of real opportunities to improve the site given the existing network and distances to infrastructure.

<b>Local Plan section</b>	<b>Comment/suggestion: HDN3- Land North of Chalk Hill Road</b>
p.401 Accessibility	Above average score in EHDC's Accessibility Study: this site is not considered to be sustainable given that residents will be reliant on the use of the private car due to distances to local facilities. There are few opportunities to improve the existing walking and cycling network, and the access proposals as seen by the Highway Authority to date do not demonstrate that safe and suitable access can be achieved. The resulting impact on the Public Right of Way network can therefore not be established.  Notwithstanding the concerns set out above, and subject to the necessary regulatory tests being met, the County Council will seek off-site obligations for surface improvements to Surface improvements to Horndean Footpath 16, 17 and 21.



Local Plan section	Comment/suggestion: LIP1 – Land north of Haslemere Road, Liphook
p.407 infrastructure requirements	Subject to the necessary regulatory tests being met, the County Council will seek off-site contributions for surface improvements to Bramshott and Liphook Byway Open to All Traffic 41.

Local Plan section	Comment/suggestion: LIP2 – Land west of Headley Road
p.409 infrastructure requirements	Subject to the necessary regulatory tests being met, the County Council will seek off-site contributions for a connection to the SANG west of the site.

Local Plan section	Comment/suggestion: CFD1- Land at Clanfield County Farm
p.417 constraints	<p>Consideration should be given as to how residents would access local facilities by sustainable modes. All modes access onto South Lane should be supported by a pedestrian link (possibly cycle subject to review of PROW status) to footpath 052/1/1 to the north of the site which could provide a connection onto Sunderton Lane and onwards into the village centre and Infant School to the east and north as an alternative route to Clanfield Junior School.</p> <p>South Lane does not currently have any cycling facilities and does not have a footway on its eastern side. The development would be expected to provide a footway on eastern side of South Lane as well as a suitable crossing point for access to the north-bound bus stop on South Lane.</p>

<b>Local Plan section</b>	<b>Comment/suggestion: CFD2- Land at Drift Road</b>
<p>p.420 Access</p> <p>p.421 infrastructure requirements</p>	<p>For vehicular access from Drift Road, consideration should be given to the safety of a new access given the gradient and curvature of the road. A footway would also need to be provided on the southern side of Drift Road as well as suitable crossing points to connect the development with the rest of the village.</p> <p>Any access strategy would need to have regard to the existing PROW through the site, footpath 119/43/1, and any proposals should seek to improve this PROW and upgrade to provide cycle as well as pedestrian facilities.</p> <p>Subject to the necessary regulatory tests being met, the County Council will also seek contributions for surface improvements to Footpath Horndean 49 running through the proposed site. This will be to County Council Design Standards with an unbound surface, minimum 2m width. It can include diversion of the PROW route through the site as long as it is an enhancement and maintains the connectivity to the wider network. The footpath should be set within a green corridor.</p>
<b>Local Plan section</b>	<b>Comment/suggestion: FMS1- Land West of Lymington Barn</b>
<p>p.426 Access constraints</p>	<p>Access to the site via walking and cycling is limited- including the current substandard footway provision on Lymington Bottom Road, including the section through the railway tunnel. Any proposal should demonstrate how pedestrian and cycle access to the site could be improved. A new vehicular access on Longbourn Way would need to be supported by new footway provision as there is currently no pedestrian link in this location.</p> <p>Vehicular access to the site is also heavily constrained and Longbourn Way is private, limiting the extent of achievable works to improve the access arrangements. There is a current application for this site which seeks to address the constraints of the design of Longbourn Way to vehicular access, however to date these are not resolved and there remains a question mark over the deliverability of the proposed improvements and the resulting impacts on the Lymington Barns and existing estate. At present, in the absence of a resolution on the access arrangements, the Highway Authority is unable to support the allocation.</p>

<b>Local Plan section</b>	<b>Comment/suggestion: FMS4- Land South of Winchester Road</b>
p.433 Access onto A31	The County Council has concern over sustainability of this site given the distance from all key infrastructure when assessed against the quantum of development (1.6km from the centre of Four Marks, 1.4km to Lymington Barns and 2.3km to Four Marks Primary). When considering a new access onto the A31, please refer to policy DM2 of Local Transport Plan 4 which states the Highway Authority “ <i>only support requests for NEW accesses onto A roads, the principal road network or traffic sensitive streets where the strategic flow of traffic is prioritised and not compromised and when all other reasonable options (such as taking access from nearby side roads) has been considered</i> ”.
p.434 infrastructure requirements	Subject to the necessary regulatory tests being met, the County Council will seek a commuted sum or developer commitment to upgrade the surface of Byway Open to All Traffic Four Marks 21, Four Marks Footpath 17b and Robley Footpath 16 surrounding the development site.
<b>Local Plan section</b>	<b>Comment/suggestion: RLC1- Land at Deerleap (north) / RLC2- Land at Deerleap (south)</b>
p.444 reason for inclusion	Concerns about access to the site given limited visibility and limited provision of active travel infrastructure in the area to connect residents to the village centre.
<b>Local Plan section</b>	<b>Comment/suggestion: RLC3- Land at Oaklands House</b>
p.445 Site Description	Deliverability is dependent on provision of infrastructure coming forward from the adjoining site and connectivity for all modes into it. In isolation this site would be considered unsustainable. The provision of access through Woodlands Avenue rather than the Whichers Gate Road is supported.

Local Plan section	Comment/suggestion: RLC4- Land at Little Leigh Farm
p.447 Access	The County Council has concerns regarding the access to the site being proposed from Prospect Lane. This road is currently single carriageway, with no footway or cycle provision and hedgerows on either side. Any proposals for this site would need to demonstrate how these issues could be overcome, as well as how pedestrian and cycle links can be provided through the site to the existing adjoining residential areas and PROWs.
p.446 constraints	In accordance with the Hampshire Minerals and Waste Plan, the County Council request the following wording, as site has been identified as having minerals as a constraint. <u>'Applicants should aim to maximise the prior extraction of mineral resources on this site, in line with the policies of the Hampshire Minerals and Waste Plan. A Mineral Resource Assessment is required to be submitted to the Minerals and Waste Planning Authority as part of any application to develop this site.'</u>
p.447 Infrastructure Requirements	Subject to the necessary regulatory tests being met, the County Council will seek off-site contributions to the nearby Staunton Country Park, a link from the development to the 'Shipwrights Way' and Bridleway 24 and a commuted sum will be provided for the public maintenance of the wider Public Right of Way network and promoted route 'Shipwrights Way'. Off-site contributions, or a developer's commitment, for the removal of unrequired stiles within the parish and along the promoted route 'St Swithuns Way' will also be required.

Local Plan section	Comment/suggestion: BWH1- Top Field, Land Adjacent to Glebe Field
p.459 Summary of Reasons for Inclusion	The site's lower-than-average score in the Accessibility Study is noted, owing to the distance from local facilities and services and lack of public transport provision. Opportunities to provide quality walking and cycling infrastructure from the site to local facilities may be limited, as whilst Station Road provides scope for improvements in places, this is not the case along its entire length and therefore provision of a safe and continuous active travel route may be difficult.

	The site is abutted by a PROW to the south and consideration should be given to provision of pedestrian links through the development site to this footpath.
p.459 Infrastructure Requirements	Subject to the necessary regulatory tests being met, the County Council will seek off-site contributions, or developers' commitment, for surface and access improvements to Footpath Bentworth 7 adjacent to southern boundary of site, leading to school.

<b>Local Plan section</b>	<b>Comment/suggestion: BWH2- Land at the Corner of Church Street</b>
p.462 constraints	Due to the rural location of Bentworth it is likely that the vast majority of trips to/from the site will be made by car and not via active or sustainable modes. The site is accessed from a narrow single lane carriageway which has heavy vegetation meaning that visibility is going to be difficult to achieve. There is no footway provision and due to the width and rural nature of the road, footway provision would need to be provided to connect to the existing PROW network.
p.462 p.464 infrastructure requirements	Subject to the necessary regulatory tests being met, the County Council will seek an obligation to maintain the alignment of Footpath Bentworth 4 through the site. Applicants would need to demonstrate proposals to improve accessibility for PROW around Saint Marys Bentworth CofE Primary School. The Countryside Service can advise on the maintenance requirements for PROW.

<b>Local Plan section</b>	<b>Comment/suggestion: MSD1- Land Rear of Junipers</b>
p.464 infrastructure requirements	<p>There are opportunities for improving walking and cycling routes to the site and linking to the existing PROW network. Although the site is in walking and cycling distance of facilities in Medstead village centre, residents of the development are likely to be reliant on car use for access to employment and secondary education due to the rural nature of the surrounding area.</p> <p>Subject to the necessary regulatory tests being met, the County Council will seek off-site contributions for surface improvements to Footpath Medstead 16 running through the proposed site, which meet Hampshire Countryside Service Design Standard. The option to divert the PROW route should result in an enhancement and meet</p>

	standards as required. Removal of stiles within the parish will also be required, along with a commuted sum for the public maintenance of footpath Medstead 14 in perpetuity.
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Local Plan section	Comment/suggestion: HOP1- Land North of Fullers Road, Holt Pound
p.471 Access	<p>Although the site is adjacent to the existing settlement boundary, the site is not within easy walking distance of a range of services, although the suggestion that the site could be connected into the existing PROW network is supported. At present the footway infrastructure to connect the site to Rowledge village centre is of low quality and variable width and there is currently no cycling infrastructure.</p> <p>Applicants should demonstrate how suitable active travel connections can be provided so that residents can access key facilities without relying on the private car.</p>
p.472 Infrastructure Requirements	Subject to the necessary regulatory tests being met, the County Council will seek off-site contributions for surface improvements to Footpath Headley 19 on the northern boundary of the proposed site, along with contributions to Bramshott Common.

### Annex 1 – Local Education Authority School Place Planning Breakdown for Housing Allocations

Site name	Proposed dwellings	Primary yield	Secondary yield	Primary per year group	Secondary per year group	Catchment Primary school	Catchment Secondary School	New school or expansion	New STP required ?	STARS Travel Plan recommended ?
ALT1 - Brick Kiln lane	150	45	32	6	6	St Lawrence CE Primary School	Amery Hill	None	yes	yes
ALT4 - Whitedown lane	90	27	19	4	4	The Butts	Amery Hill	None	no	yes
ALT5 - Mounters Lodge	24	7.2	5	1	1	Chawton CE Primary School	Amery Hill	None	no	yes
ALT 8 - Neatham Manor Farm	1000	300	210	43	42	Andrews Endowned CE Primary School	Eggars School	New school or expansion to existing	yes	yes
W&B1 - WH&B town centre	317	95	67	14	13	Bordon Infant & Junior Schols	Oakmoor School	none	yes	yes
W&B2 - Bordon Garrison	115	35	24	5	5	Bordon Infant & Junior Schols	Oakmoor School	none	yes	yes
W&B3 - BOSC expansion	38	11	8	2	2	Bordon Infant & Junior Schols	Oakmoor School	none	no	yes
W&B4 - Louisberg extension	27	8	6	1	1	Bordon Infant & Junior Schols	Oakmoor School	none	no	yes
W&B7 - Hollywater Rd & Mill Chase Rd	126	38	26	5	5	Weyford Nursery & Primary School	Oakmoor School	none	yes	yes

Site name	Proposed dwellings	Primary yield	Secondary yield	Primary per year group	Secondary per year group	Catchment Primary school	Catchment Secondary School	New school or expansion	New STP required ?	STARS Travel Plan recommended ?
W&B8 - Forest Centre	44	13	9	2	2	Weyford Nursery & Primary School	Oakmoor School	none	no	yes
HDN1 - Woodcroft Farm	164	49	34	7	7	Woodcroft Primary School	Horndean Technology College	none	yes	yes
HDN2 - Five Heads Road	118	35	25	5	5	Catherington CE Infant School	Horndean Technology College	none	yes	yes
HDN3 - Chalk Hill	38	11	8	2	2	Catherington CE Infant School	Horndean Technology College	none	yes	yes
LIP1 - Haslemere Road	24	7	5	1	1	Liphook Infant & Junior Schools	Bohunt School	none	no	yes
LIP2 - Headley Road	20	6	4	1	1	Liphook Infant & Junior Schools	Bohunt School	none	no	yes
LIP3 - Chiltley Farm	67	20	14	3	3	Liphook Infant & Junior Schools	Bohunt School	none	no	yes
CFD1 - Clanfield County Farm	100	30	21	4	4	Petersgate Infant & Clanfield Junior Schools	Horndean Technology College	none	yes	yes
CFD2 - Drift Road	80	24	17	3	3	Petersgate Infant & Clanfield	Horndean Technology College	none	no	yes



Site name	Proposed dwellings	Primary yield	Secondary yield	Primary per year group	Secondary per year group	Catchment Primary school	Catchment Secondary School	New school or expansion	New STP required ?	STARS Travel Plan recommended ?
						Junior Schools				
FMS1 - Lymington Barn	90	27	19	4	4	Medstead Primary School	Amery Hill	none	no	yes
FMS2 - Blackberry Lane	20	6	4	1	1	Four Marks Primary	Perins Academy	none	no	yes
FMS\$ - South of Winchester Road	100	30	21	4	4	Four Marks Primary	Perins Academy	none	yes	yes
RLC3 - Oaklands House	51	15	11	2	2	Rowlands Castle Primary	Horndean Technology College	none	no	yes
RLC4 - Little Leigh Farm	81	24	17	3	3	Rowlands Castle Primary	Horndean Technology College	none	no	yes
BEN1 - Hole Lane	20	6	4	1	1	Bentley CE Primary School	Eggars School	None	no	yes
MSD1 - Junipers	15	5	3	1	1	Medstead Primary School	Amery Hill	None	no	yes
HOP1 - Holt Pound	19	6	4	1	1	Rowledge CE Primary School	Eggars School	None	no	yes
LOV1 - Lovedean Lane	30	9	6	1	1	Woodcroft Primary School	Horndean Technology College	None	no	yes



Hart District Council  
Harlington Way  
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Telephone: 01252 622122  
8<sup>th</sup> March 2024

(by email)

[REDACTED]  
Planning Policy Team  
East Hampshire District Council  
Woodlands Hall  
Larch Road  
Bordon  
GU35 8AS

Dear [REDACTED]

**East Hampshire Draft Local Plan 2021-2040: Regulation 18 consultation version**

Thank you for consulting Hart District Council (HDC) on East Hampshire District Council's (EHDC) Local Plan Update (Regulation 18).

The following response has been drafted by Officers and is awaiting approval from [REDACTED], Portfolio Holder for Place.

**Duty to Cooperate**

We are satisfied that thus far EHDC has met the duty to co-operate. HDC and EHDC have signed a Statement of Common Ground covering housing need, gypsy and traveller sites, infrastructure, climate change, and employment, leisure, retail and other commercial uses.

EHDC's draft plan is at an early stage (Regulation 18) and some of the evidence base, including a Transport Assessment and Infrastructure Delivery Plan, are still being prepared. As the local plan progresses we would welcome the opportunity to assess the results of these reports to understand any cross-boundary impacts on Hart.

We also acknowledge ongoing changes to the planning system and the plan-making regime and wish to emphasise the need for ongoing dialogue to address cross-boundary issues as further guidance becomes available.

We look forward to future discussions as your local plan progresses and in preparing any updates to the Statement of Common Ground.

### **Gypsy and Traveller Accommodation Needs**

EHDC states it will likely have an unmet need for gypsy, traveller and travelling showpeople accommodation and have requested assistance from neighbouring authorities in this regard.

We appreciate that meeting your needs in full may be challenging. Nevertheless, it is suggested that EHDC continue to explore additional options to accommodate gypsy, traveller and travelling showpeople pitches in full. For example, can greater use be made of the proposed site allocations in the plan, incorporating traveller provision within larger developments?

We note that you propose six travelling showpeople plots at ALT8 Neatham Manor Farm, but query why, in the context of a 1,000 homes site, no traveller pitches are proposed? In addition, could some of the unmet needs be addressed at other site allocations? Before approaching other authorities, we would expect to see evidence as to why greater use cannot be made of those sites.

Basingstoke and Deane Borough Council has, coincidentally, consulted on its draft local plan at the same time as East Hampshire. They are incorporating traveller provision within their site allocations in order to meet their needs in full.

We have our own challenges in terms of meeting need for traveller accommodation and are not in a position to assist by taking unmet need from other authorities.

Following the adoption of the [Hart Local Plan \(Strategy & Sites\) 2032](#), we started work on a Traveller Accommodation DPD as referenced in the Local Plan examination report and at Policy H5 of the plan. A call for sites was undertaken but no suitable sites were forthcoming. Due to a combination of challenges resulting from a lack of sites, the Covid-19 pandemic and changes to the planning system, it was decided that planning for traveller accommodation could be most effectively addressed in preparation of the next local plan.

Whilst EHDC's Gypsy and Traveller Accommodation Assessment does not identify a need for transit traveller accommodation, we recognise the strategic importance of transit sites across Hampshire in reducing unauthorised encampments.

Subsequently, we welcome EHDC's support for new transit sites through draft Policy H7.3 and will continue to share information on unauthorised encampments with EHDC where appropriate.

### **Cross-boundary Transport Impacts**

We note that new development is proposed at Alton, and to a lesser extent Bentley, both of which are relatively close the boundary with Hart.

At this stage we do not raise any concerns in relation to the proposed site allocations identified in the draft local plan but wish to gain a better understanding of the cumulative impacts of proposed development.

Following the publication of a Transport Assessment, we would be willing to work with EHDC and Hampshire County Council to discuss any potential cross-boundary transport matters and any mitigation required as a result of the proposed growth strategy.

### **Climate change**

We support EHDC's suite of progressive and ambitious climate change policies that aim to achieve net-zero carbon development in terms of both operational emissions and embodied carbon, and a presumption in favour of renewable and low carbon energy schemes.

We also support EHDC's Policy DGC2: Sustainable Transport which aims to reduce carbon emissions through support for walking, cycling and public transportation. HDC encourage the identification of suitable cross-boundary active travel routes between East Hampshire and Hart in EHDC's LCWIP update and would welcome opportunities for engagement on this topic.

### **Other Policy Areas**

- We support EHDC's strategic housing policies which ensure the need for new homes is met fully by EHDC.
- We also support EHDC's economic policies which meet the needs of local businesses and employment through a focus on strategic employment sites, and the rural and tourist economies.

### **General**

As a neighbouring authority we would welcome ongoing dialogue with EHDC in order that strong policies on issues such as climate change, biodiversity and health and wellbeing are developed as part of its Local Plan Update. As you will be aware Hart declared a Climate Emergency in April 2021 and is keen that new development both within and beyond Hart's boundaries properly addresses these issues. Equally we would expect to see policies that promote mixed and balanced communities and those that meet the needs of particular groups, including affordable housing, homes for the older people and travelling communities.

If you have any questions, or wish to discuss any of the issues raised in this response please do not hesitate to contact me.

Yours sincerely,

Planning Policy Team

FAO [REDACTED]  
Sent by email only to  
[localplan@easthants.gov.uk](mailto:localplan@easthants.gov.uk)

**Enquiries to:** [REDACTED]  
**Direct line:**  
**Email:** [REDACTED]@havant.gov.uk  
**My reference:**  
**Your reference:**  
**Date:** 4 March 2024

Dear [REDACTED]

## **Our Local Plan 2021-2040 consultation – response from Havant Borough Council**

Thank you for consulting Havant Borough Council on East Hampshire's Draft Local Plan. The feedback below represents the Borough Council's comments on the Draft Local Plan, nonetheless this represents an early stage in the collaborative discussions which will be needed in order to ensure that both of our local authorities have an up-to-date local plan in place.

### **Duty to cooperate**

Havant Borough Council and East Hampshire District Council have a strong history of collaboration and cooperation, principally through the Partnership for South Hampshire (PfSH). The PfSH Spatial Position Statement (SPS) is of course a useful starting point in demonstrating compliance with the duty to cooperate. However, given the scale of unmet need that exists within the sub-region, it is important that there continue to be constructive and active discussions between our two authorities to effectively address this matter. It is Havant Borough Council's position that relying solely on the PfSH SPS will not demonstrate compliance with the duty to cooperate. As such, ongoing discussions and a bi-lateral statement of common ground will need to be agreed in order to demonstrate that this matter is appropriately addressed by our respective local plans.

Planning Practice Guidance on plan-making<sup>1</sup> sets out that strategic policy-making authorities should cooperate in meeting housing need, using the most appropriate functional geographical area, such as a housing market area (HMA). That being a case, there is a clear functional geography between East Hampshire's southern parishes and that of Havant for which there is a significant unmet housing need.

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<sup>1</sup> [Plan-making - GOV.UK \(www.gov.uk\)](http://www.gov.uk) Paragraph: 017 Reference ID: 61-017-20190315  
Revision date: 15 03 2019

The NPPF indicates that unmet need from neighbouring areas should be taken into account in establishing the amount of housing to be planned for. At this stage, it is noted that the Draft Local Plan makes allowance for unmet need in its supply instead of its housing requirement (this is set out in further detail below).

Havant Borough Council has undertaken extensive analysis on its likely housing supply which we began setting out in our meeting in October 2023 and is expanded upon in a separate letter regarding the Duty to Cooperate alongside this consultation response. Havant Borough will require assistance from our neighbouring authorities to provide a meaningful contribution towards its housing need if it is to get anywhere close to meeting its needs in full. The letter formally asks whether your authority is able to accommodate any of Havant Borough's unmet housing need.

The approach to housing supply is set out in the Draft Local Plan and the Housing Background Paper. The background paper on housing is helpful in explaining and justifying the position and is welcomed.

The Draft Local Plan identifies and includes allocations for 3,500 new homes against a need for 2,857 – this creates a surplus of 643 homes. Nonetheless, the background paper stresses that *“this includes some allowance for flexibility and to allow for sites allocated not coming forward during the plan period, together with any unmet needs from neighbouring authorities”*. The paper also acknowledges that *“For the purposes of this Local Plan, no assumptions are made on the unmet needs of other neighbouring local planning authorities (with the exception of the SDNPA), but any dwellings surplus to the identified requirements could be attributed to any future identified unmet need, particularly in the South Hampshire sub-region. East Hampshire Local Planning Authority continues to work with neighbouring authorities and future iterations of the local plan will be informed by further information on potential unmet need under the duty to cooperate.”*

Havant Borough Council welcomes the acknowledgement that development over and above the need for housing in East Hampshire could be attributed to any future identified unmet need. The continued commitment to working with neighbouring authorities is also welcomed, in line with the Duty to Cooperate.

Nonetheless, the Borough Council would also caution that the level of unmet need in Havant Borough is currently calculated at 4,309 dwellings and so the identified surplus of 643 would thus fall far short of Havant Borough's unmet need.. It is noted this buffer would further reduce with any non-implementation of sites. We look forward to continuing a collaborative set of discussions, with the aim of addressing all cross-boundary issues, not limited to but certainly including addressing the collective need for housing in Havant Borough and the wider Housing Market Area and sub region.

You will be aware of the work that has been undertaken between our two authorities to address the duty to co-operate in recent years. Moving forwards, we would welcome a

series of detailed discussions with yourselves as our respective plans progress, in order to ensure that unmet need and other cross-boundary matters are robustly addressed. It is the Council's ambition to agree a statement of common ground prior to any Regulation 19 consultation on either of our plans thereby minimising soundness and legal compliance issues for both plans.

### **Individual allocations**

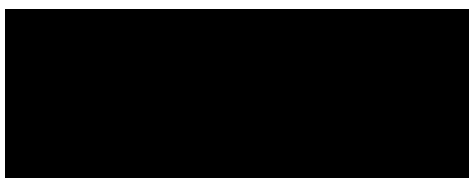
Havant Borough Council notes that there are two sites which are immediately adjacent to the border between the two authorities:

- HDN1 - Land at Woodcroft Farm - 164 dwellings (this land actually lies adjacent to a development for ~290 dwellings currently being built out in Havant Borough planning references (APP/13/00804; APP/20/00357)
- RLC4 - Land at Little Leigh Farm - 81 dwellings

With a large unmet need, it is expected that allocations are likely on land close to Havant and within the Portsmouth Housing Market Area. Havant Borough Council looks forward to working with East Hampshire District Council to refine these two individual allocations, together with any further ones which emerge close to the boundary. It is essential that allocations reflect our respective evidence base studies, particularly on infrastructure need.

I hope that the feedback above is useful in clearly setting out the Borough Council's position at this time. We very much look forward to working collaboratively with our District Council colleagues to refine the proposals and agree a statement of common ground prior to the pre-submission stage.

Yours sincerely



Strategic Planning Manager



Historic England

FAO: Planning Policy team  
East Hampshire District Council

Our ref: PL00332222

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

01 March 2024

Dear Planning Policy team

Thank you for consulting Historic England on the East Hampshire Local Plan (Regulation 18). As the Government's adviser on the historic environment, Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process.

In this letter I set out a summary of our general comments below and append more detailed comments and suggestions. Our headline comments are as follows.

### **Evidence base**

Paragraph 31 of the NPPF requires the preparation and review of all policies to be underpinned by relevant and up-to-date evidence. In its evidence base, the Council's webpages on the [environment](#) and [other studies](#) contain little heritage-focused content. Of course, published reports such as the [Neighbourhood Character Study](#) and [Landscape Capacity Study](#) include important heritage components; however, a lack of more detailed focus on the historic environment suggests that more work is needed to ensure that a suitable evidence base informs the plan.

Clearly, national sources of information on the historic environment include the [National Heritage List for England](#) and the [Heritage at Risk Register](#). Locally we note the Council's Conservation Area guidance documents, the Atlas of Hampshire's Archaeology, the Hampshire Integrated Character Assessment, data held by the Hampshire Gardens Trust and, of course, the Hampshire Historic Environment Record.

We recommend bringing together existing evidence in a more focused way, which can also help to reveal any gaps that need to be filled.<sup>1</sup> We expect the Council to demonstrate in its local plan how that historic evidence base has informed and influenced the plan's policies and site allocations.

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<sup>1</sup> For example, is there a list of locally important heritage assets?





One step the Council may wish to consider is preparing a topic paper on heritage to collate key pieces of evidence in one place. Historic England's advice on the historic environment in local plans ([Good Practice Advice Note: 1: "The Historic Environment in Local Plans"](#)) suggests that "It may be helpful to collate this information within a Heritage Topic Paper to draw together the evidence prepared and the subsequent implications and actions required." This could even evolve into a Heritage Strategy, which seeks to prioritise action, identify potential partners and funding opportunities, and perhaps support a refresh of the Council's heritage grants initiative and local buildings at risk register.

### **Heritage impact assessment needed for selected site allocations**

Connected with underpinning evidence, we have yet to gain a clear sense of how proposed allocations would respond to heritage sensitivities, either to avoid or minimise harm, or to maximise benefits arising from sensitive development in a historic place. Some allocations refer to mitigation through appropriate design and layout; but this aspiration does not provide adequate safeguards and detail in all cases to deliver a sound approach.

Heritage impact assessment (HIA) is needed to inform wording where more detail is needed. Only by assessing potential impacts in proportionate detail, informed by heritage expertise, can the plan be confident about the acceptability or not of development and inform appropriate allocation policies.

In terms of methodology, Historic England Advice Note 3 on '[The Historic Environment and Site Allocations in Local Plans](#)' recommends a 5-step approach:

- Step 1: identify which heritage assets are affected by the potential site allocation
- Step 2: understand what contribution the site (in its current form) makes to the significance of the heritage asset(s)
- Step 3: identify what impact the allocation might have on that significance
- Step 4: consider maximising enhancements and avoiding harm
- Step 5: determine whether the proposed site allocation is appropriate in light of the NPPF's tests of soundness

To reiterate a key point, assessment should be proportionate, so the level of detail will vary depending on the site, its size and the number and significance of heritage assets affected. Exemplifying this point, it would need to be more detailed for the sites in Rowlands Castle and land at Parsonage Lane. As stated in the IIA, there is the potential in these locations for major adverse impacts; but we disagree with the IIA when it suggests a course of action reliant solely requiring a Heritage Statement as part of a planning application.



We recommend HIA for the following sites, informed by liaison with the Council's conservation team and its archaeological advisers. For expediency, it may be feasible to group some of these together, hence the groupings below.

<p><b>ALT1 – Land at Brick Kiln Lane, Alton</b></p> <p>Informed by the <a href="#">HER</a>, the <a href="#">NHLE</a>, the <a href="#">Alton neighbourhood plan</a> and its evidence base, the <a href="#">townscape study for Alton</a> associated with the Hampshire Integrated Landscape Character, the <a href="#">historic settlement survey for Alton</a> etc.</p>
<p><b>W&amp;B1 – Whitehill &amp; Bordon Town Centre Intensification</b>  <b>W&amp;B2 – Land at the Former Bordon Garrison</b></p> <p>Informed by the <a href="#">HER</a>, the <a href="#">NHLE</a>, and other sources</p>
<p><b>W&amp;B7 – Land at Hollywater Road and Mill Chase Road</b>  <b>LIP1 – Land north of Haslemere Road, Liphook</b></p> <p>Informed by the <a href="#">HER</a>, the <a href="#">River Wey guidance leaflet</a> etc.</p>
<p><b>HDN2 – Land south of Five Heads Road</b>  <b>CTN1 – Land at Parsonage Farm</b>  <b>CTN2 – Land at the Dairy</b></p> <p>Informed by the <a href="#">HER</a>, the <a href="#">NHLE</a>, <a href="#">Catherington character appraisal</a>, the <a href="#">Neighbourhood Character Study</a>, <a href="#">the historic settlement survey for Catherington</a> etc.</p>
<p><b>RLC1 – Land at Deerleap (north)</b>  <b>RLC2 – Land at Deerleap (south)</b></p> <p>Informed by the <a href="#">HER</a>, the <a href="#">NHLE</a>, the <a href="#">Rowlands Castle guidance leaflet</a>, the <a href="#">Neighbourhood Character Study</a> and the <a href="#">Rowlands Castle neighbourhood plan</a> and its supporting evidence etc.</p>
<p><b>BEN1 – Land west of Hole Lane, Bentley</b></p> <p>Informed by the <a href="#">HER</a>, the <a href="#">NHLE</a>, the <a href="#">Bentley character appraisal</a>, the <a href="#">Neighbourhood Character Study</a>, the <a href="#">Bentley neighbourhood plan</a> and its supporting evidence, the <a href="#">historic settlement survey for Bentley</a> etc.</p>
<p><b>BWH1 – “Top Field”, land adjacent to Glebe Field</b>  <b>BWH2 – Land at the corner of Church Street</b></p> <p>Informed by the <a href="#">HER</a>, the <a href="#">NHLE</a>, the <a href="#">Bentworth guidance leaflet</a>, the historic <a href="#">settlement survey for Bentworth</a> etc.</p>
<p><b>LOV1 – Land rear of 191 - 211 Lovedean Lane</b></p> <p>Informed by the <a href="#">HER</a>, the <a href="#">NHLE</a> and other sources</p>

When approaching such assessment, please note:

- the wording of statements in the draft plan suggest a focus on buildings and designated heritage assets. This seems to exclude consideration of non-designated heritage assets, including archaeological remains, an approach that would not align with the NPPF. We highlight the importance of considering potential impacts on all types of heritage.
- if the relevant conservation area guidance document is old and no longer an accurately summarises the conservation area's character and issues, its updating may need to be prioritised.

### **Greener places**

Historic England considers the global climate crisis is one of the most significant and fastest growing threats to people and their cultural heritage. We recognise that the historic environment sector has a role to play in tackling the climate crisis.

While we welcome reference in policy CLIM2 to requirements for development involving existing buildings, there is an important opportunity to clarify the different approach needed to the retrofit of traditionally constructed buildings. We suggest alternative wording for consideration.

We welcome the thrust of CLIM3, prioritising the retention of existing buildings.

Support for renewable energy development clearly forms an important part of a bigger response. The Council refers to its 2018 study to provide a spatial steer for such development. We welcome acknowledgement in the plan that site specific analysis would still be needed and emphasize the importance of considering impacts on the setting of heritage assets (not covered by the 2018 study). The text associated with policy CLIM4 refers to setting but needs to be tightened. Currently there is scope for those who refer to the 2018 study to be misled by terms such as “unconstrained”. Language in the plan needs to be as clear as possible on this matter.

### **Safeguarding our natural, historic and built environment**

As we state in our detailed comments, clarity is needed that “built” does not mean the same as “historic”. Having set a suitably broad framework, clarity is also needed that the natural and historic environments are integral to each other. This relates especially to the text supporting policies NBE2, NBE3 and NBE12.





### Detailed Comments

Our additional detailed comments on the plan are set out in Appendices A and B. Where we have stated 'object', this is principally intended as a marker to convey that we are looking for more than is presented in the draft plan to deliver a sound approach. We provide brief comments on the Integrated Impact Assessment in Appendix C.

To avoid any doubt, this does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed Local Plan, where we consider these would have an adverse effect on the historic environment.

I hope that these comments are helpful. If you have any queries about this matter or would like to discuss anything further, please do not hesitate to contact me.

Yours sincerely

 BSc, MRTPI  
Historic Environment Planning Adviser  
Development Advice – London and the South East Region  


## APPENDIX A: Detailed comments on the Regulation 18 plan

Page	Paragraph	Support / object	Comment	Suggested wording if appropriate
25	Vision	Comment	The vision does not meaningfully connect with the District's historic environment. This sets an initially unhelpful steer for the plan when seeking to deliver a positive strategy for the historic environment. Ideally the vision would connect explicitly to the district's heritage, but there are also more nuanced ways of introducing such a concept, such as shown in the adjacent proposed wording.	"By 2040 and beyond, our residents will live in healthy, accessible and inclusive communities, where quality affordable homes, local facilities and employment opportunities in sustainable locations provide our communities with <u>distinctive, green</u> and welcoming places to live, work and play and respond positively to the climate emergency."
27	B1	<b>Object</b>	<p>Paragraph 8c of the NPPF describes the environmental objective of sustainable development in terms of protecting and enhancing "our natural, built and historic environment". We are concerned by the implication that "built" is synonymous with "historic". These two words have different meanings and objective B1 should ensure that both words are used.</p> <p>On a connected matter, without reference to the historic environment, there is also the risk that the objective fails to connect appropriately with the district's archaeological remains.</p>	"Make sure that new developments are located to maintain and improve the quality of built, <u>historic</u> and natural environments, including our high-quality and valued built heritage and landscapes, whilst maintaining the integrity of existing settlements and their settings."
28	C1	<b>Object</b>	It is unclear if this objective aims to connect with the historic environment or not. This needs to be made explicit. We query the similarity of the opening of this paragraph to B1 and wonder if the text in C1 might be abridged as shown. We suggest also referring to the wider historic landscape.	<del>"Maintain and enhance the built and natural environments to</del> <u>Support habitats and their connectivity, help the public to access and enjoy open spaces, and green infrastructure and the wider historic landscape."</u>
58	CLIM2: Net-Zero Carbon Development: Operational Emissions	<b>Object</b>	<p>We query if heritage significance is being considered by the council as a "technical constraint" according to criterion CLIM2.2.</p> <p>The relationship between new residential development and the site's historic context should also be acknowledged in the approach.</p> <p>While we welcome reference to existing buildings, it is important to clarify that a different approach is</p>	"CLIM2.5 Retrofitting measures to improve the energy efficiency of existing buildings will be supported, subject to other policies of the development plan. <u>Retrofitting of traditionally constructed buildings should take a whole building approach, informed by heritage expertise."</u>

			needed to the retrofit of traditionally constructed buildings. We suggest wording for consideration and recommend underpinning this with explanatory text that also flags the risks from maladaptation.	
67	CLIM3: Net-Zero Carbon Development: Embodied Emissions	Comment	We welcome this policy, including the proposed presumption against demolition and the 'renovate and retrofit' first approach. We encourage the supporting text to articulate the need to take account of <u>heritage significance</u> in renovation and retrofitting.	
73	CLIM4: Renewable and Low Carbon Energy	<b>Object</b>	<p>CLIM4.1: While we support a presumption in favour of permission under broadly the criteria outlined, the wording needs to be tightened regarding setting (minor editing should suffice), noting that the 2018 renewables study does NOT seem to consider the setting of heritage assets. This is a key aspect of the 2018 study, which needs to be addressed through clear policy wording, supported by relevant supporting text.</p> <p>CLIM4.3: Given the uncertain scale and potential impacts of the infrastructure covered, criteria are surely needed to deliver a sound approach in supporting the transition to net zero carbon. Might CLIM4.3 cross-refer to criteria CLIM4.1 a-c (or at least a)?</p>	<p>"....a. the impacts are acceptable having considered the scale, siting and design, and the consequent impacts on landscape character; visual amenity; biodiversity; geodiversity; flood risk; townscape; heritage assets, <u>including their settings,</u> and the historic landscape including impact on the South Downs National Park and the Surrey Hills Area of Outstanding Natural Beauty; and highway safety and rail safety;" ...</p> <p>"Where planning permission is needed, the Local Planning Authority will support proposals which are necessary for, or form part of, the transition to a net zero carbon East Hampshire, <u>subject to applying criteria a-c in CLIM4.1.</u> This could include proposals for energy generating technologies to meet the requirements of Policy CLIM2; energy storage facilities (such as battery storage or thermal storage); and upgraded or new electricity facilities (such as transmission facilities, sub-stations or other electricity infrastructure)."</p>
75	4.56	Comment	<p>We recommend expanding paragraph 4.56 to make explicit that the areas of potential opportunity identified in the study do NOT take account of the setting of heritage assets.</p> <p>We note that the 2018 study seems to take account of archaeological interest sites and archaeological alert sites for solar but not for wind. We would be interested to find out the rationale for this approach.</p>	<p>"It should, however, be noted that these areas do not provide a definitive statement of the suitability of a particular location for wind energy. <u>For example, they do not take account of potential impacts on the setting of heritage assets.</u> Site specific assessment and design will still be required, and all applications will be assessed on their individual merits."</p>

86	Heading	<b>Object</b>	As stated regarding objective B1, Paragraph 8c of the NPPF describes the environmental objective of sustainable development in terms of protecting and enhancing “our natural, built and historic environment”. We are concerned by the implication that “built” is synonymous with “historic”. They mean different things. The heading should ensure that both words are used.	“Safeguarding our natural, <u>historic</u> and built environment”
90	NBE1: Development in the Countryside	Support	We welcome this policy.	
97	NBE3: Biodiversity Net Gain	Comment	<p>The text supporting this policy should acknowledge the relationship between the natural and historic environments.</p> <p>Newly created or altered habitats will sit within a historical landscape and may have both positive and negative impacts on setting as well as physical and chemical conditions of heritage assets.</p> <p>We suggest adding a new paragraph on this topic, which cross-refers to text supporting policy NBE10. More information can be found in the <a href="#">Natural England Green Infrastructure Framework</a>.</p>	
120 / 121	NBE10: Landscape	Comment	The text supporting this policy should acknowledge the relationship between the natural and historic environments. More information can be found in <a href="#">Heritage Counts</a>	
133	5.103	Comment	This paragraph feels like a rewrite of the definition of the historic environment, which is included at the base of the page. I am not sure that it is needed.	
133	5.104	Comment	We suggest a reworking of the second half of this paragraph, noting that it omits Registered Parks and Gardens and non-designated heritage assets. Also, technically, reference should be made to archaeological remains rather than archaeology (the study of those remains).	“Protecting and enhancing the historic environment is an important part of sustainable development. This section sets out policies for the conservation and enjoyment of the historic environment. <u>In East Hampshire, t</u> This includes conservation areas, listed buildings, <u>ancient woodland, registered parks and gardens, scheduled ancient</u>

			<p>There's a logic to group designated heritage assets together and refer to ancient woodlands in a wider reference to historic landscape.</p> <p>Here and throughout the plan, to connect with national planning policy, we recommend referring to scheduled monuments rather than scheduled ancient monuments.</p>	<p>monuments, <u>and non-designated heritage assets (including archaeological remains) and the wider historic landscape, including ancient woodlands.</u>"</p>
134 / 135	NBE14: Historic Environment	Comment	<p>We note that policy NBE14 is a strategic heritage policy. That said, it begins with a development management focus.</p> <p>We query if criterion NBE14.1 could be recast to offer a broader approach that connects with other important aspects of the Council's positive strategy for the historic environment. We give an example of what this could look like in the adjacent column, adding an additional element that connects with the District's archaeological resources.</p> <p>Arguably policy wording in NBE14.2 offers greater protection to non-designated heritage assets than offered by the NPPF. That said, this is unlikely to be a matter to which we would object.</p> <p>There is repetition of text in criteria NBE14.2c and NBE 4.3c. Should the Council wish to streamline the policy, such repetition could be avoided if text were lifted from both criteria into a separate standalone paragraph that applies to all development that would harm a heritage asset.</p> <p>The formatting of the headings on page 135 is confusing. It seems to imply that Heritage Statements are a subset of text on "Proposals for the removal of all or part of a heritage asset" where surely that is not the intention. Should "Heritage Statements" be in all caps?</p>	<p>"NBE14.1 <u>In addition to fulfilling its statutory obligations, the Council will seek to Development proposals will be permitted which:</u></p> <p>a. <u>identify, protect, conserve and, where possible, enhance the significance of designated and non-designated heritage assets and the contribution they make to local distinctiveness and sense of place; and</u></p> <p>b. <u>encourage proposals that make sensitive use of historic assets, especially those at risk, through regeneration and re-use, particularly where redundant or under-used buildings are brought into appropriate use; and</u></p> <p>c. <u>secure public benefits and greater understanding from the District's archaeological resources.</u></p>
136 - 139	Text and maps supporting NBE14	Comment	<p>We encourage this supporting text to be expanded to include a more detailed introduction to the District's heritage (drawing from a heritage topic paper, if that is pursued as suggested in our cover letter), including coverage of the Council's approach to heritage at risk.</p>	



			We query why Figures 5.5-5.7 only map conservation areas and scheduled monuments. Could similar maps be inserted on other heritage assets?	
137 - 139	Figs 5.5 – 5.7	Comment	We advise referring to Scheduled Monuments rather than Scheduled Ancient Monuments, thus aligning with the NPPF.	
147	DES1: Well-designed places	Comment	As demonstrated by reference to the historic environment in the National Model Design Code approach to “context”, explicit reference should be made to the historic environment in this policy. We suggest one such change.	“b. Reinforces or creates a strong, positive identity that comes from the ways in which buildings, infrastructure, boundary treatments, open spaces and natural <u>and historic</u> features visually and physically interact;”
155	DES2: Responding to local character	Comment	Explicit reference is needed to ensure the importance of the historic environment is recognised when responding to local character. We suggest modifications that could enable this to be embedded. Other changes may also be appropriate.	“b. Ensure that the layout of new development is sympathetic to its immediate setting in terms of its relationships to adjoining buildings, spaces around buildings, <u>the setting of heritage assets</u> and landscape features;”  “e. Take particular account of local landscape and townscape features such as those identified within neighbourhood plans, design statements or guides, <u>conservation area appraisals</u> or townscape character assessments;”
160	6.26	Comment	Reference should be made to “historic” avoiding the implication that “built” means the same thing.	“However, residential development proposals should not undermine the important built, <u>historic</u> and natural characteristics of a neighbourhood.”
169	DES4: Design codes	Comment	We would welcome discussion with the Council about its plans for design coding (in due course) and support the Council in recognising the underpinning role of the historic environment in this regard.  I would also be interested to discuss the proposed approach in DES4.4 to select only a subset of characteristics from the National Design Guide that could result in binding requirements.	
276	DM2: Trees, hedgerows and woodland	Support	We welcome this policy.	

278	11.22	Comment	Might the text here usefully cite the Council's general duty under the <a href="#">Planning (Listed Buildings and Conservation Areas) Act 1990</a> ?	
279	DM3: Conservation areas	Support	We welcome this policy.	
281	DM4: Listed buildings	Comment	We suggest a minor amendment to avoid any confusion about what is meant by "over-restoration".  Also, we suggest in the supporting text a cross reference to text earlier in the plan in the section on greener places regarding retrofit of traditionally constructed buildings.	"Applications for new works to listed buildings will be carefully assessed. Extensions will be required to be of an appropriate scale and design and in materials that retain the special interest of the original building. The character and significance of the building should not be diminished by <u>loss of original fabric, including through unsympathetic restoration over-restoration</u> . Existing architectural or historic features including internal features should be retained as they are important to the character of the building."
284	11.39	Comment	Should the policy reference be to NBE14 rather than S28?	
284	DM5: Advertisements affecting heritage assets	Comment	While we welcome this policy, there is a risk that criterion 5.2 implies that consent would be granted in all circumstances.  There could be circumstances in which a hanging sign would not be appropriate. We suggest this be amended and offer alternative phrasing for consideration.	"Where a building is listed, locally listed or has a special character, the planning authority will <u>consider granting</u> <del>grant</del> advertisement consent or listed building consent for painted timber fascia advertisements and traditional hanging signs, <u>where a building is listed, locally listed or has a special character.</u> "
287	DM6: Shopfronts affecting heritage assets	Support	We welcome this policy.	
286	11.45	Comment	Should the policy reference be to NBE14 rather than S28?	
288	11.50	Comment	Should the policy reference be to NBE14 rather than S28?	
289	DM7: Archaeology and ancient monuments  and its supporting text	Comment	While we welcome strong protection to conserve archaeological remains, there may be a degree of conflict in criterion DM7.1 with criterion NBE14.2. Might the wording of the final line of DM7.1 be amended to align with NPPF paragraph 206 as a way to reconcile this?	"DM7.1 The archaeological and historic integrity of designated heritage assets such as Scheduled Monuments and other <u>nationally</u> important archaeological sites, together with their settings, will be protected and, where possible, enhanced. Development which would adversely affect them will not

			<p>Also, to support alignment with policy DM10, should 7.1 make clear that its focus is on <u>nationally</u> important (rather than <u>locally</u> important assets)?</p> <p>Acknowledging NPPF paragraph 200, before focusing on field evaluations in criterion 7.2 should the policy refer to desk-based assessments? Also, we recommend adding a reference to the Historic Environment Record.</p> <p>In the supporting text we suggest referring to:</p> <ul style="list-style-type: none"> <li>• Scheduled Monuments (e.g. in paragraph 11.59) rather than Scheduled Ancient Monuments.</li> <li>• the need to notify Historic England in cases where Scheduled Monument Consent (SMC) will be required, and for the plan to encourage early engagement with Historic England where SMC is going to be required.</li> </ul>	be permitted, other than in wholly <u>exceptional circumstances.</u> "
292	11.60	Comment	Should the policy reference be to NBE14 rather than S28?	
293	DM8: Historic landscapes, parks and gardens  and its supporting text	Comment	<p>In criterion c we encourage adding reference to enhancements, rather than aiming only to avoid harm. We suggest wording for consideration.</p> <p>We're not entirely clear about the purpose of criterion DM8.2 d. While RPGs and Conservation Areas do intersect in East Hampshire, we are unsure what this criterion adds that is not already within NBE1.</p> <p>In the supporting text, we recommend referring also to assets identified by the <a href="#">Hampshire Gardens Trust</a> on their register.</p>	c. development that does not detract from landscape and village settings will normally be supported, subject to compliance with other Local Plan policies. <u>Proposals that enhance such settings are encouraged.</u>
294 / 295	DM9: Enabling Development  and its supporting text	<b>Object</b>	Enabling development, by definition, focuses on policies that do not align with the local plan. As worded, I am not convinced that this policy and its supporting text is appropriate in the local plan. I suggest this policy is deleted.	

296 / 297	DM10: Locally important and non-designated heritage assets and its supporting text	Comment	<p>I would welcome the opportunity to discuss with the Council whether the section heading and policy DM10 should refer simply to “Non-designated heritage assets”.</p> <p>To refer to locally important and non-designated heritage assets risks implying the former is not a type of the latter.</p> <p>The supporting text can explain what is meant by non-designated heritage assets – our comments on paragraph 11.68 also refer.</p> <p>Also I encourage greater clarity on the Council’s approach to local listing in the supporting text.</p>	
296	11.67	Comment	The intention of this paragraph is unclear. I suggest this is revisited.	
297	11.68	Comment	Currently this text risks being in conflict with the NPPF as it seems to imply that non-designated heritage assets are a sub-category of locally important heritage assets, and that (for example) parks & gardens of local interest are not a type of non-designated heritage asset. While there are various ways to achieve the desired goal, we advise greater clarity.	
297	11.74	Comment	I suggest adding a line to this paragraph that makes clear if the NDHA is of national importance, then policy on designated heritage assets will apply in accordance with criterion DM7.1.	
304	DM14: Public art	Support	We welcome this policy	
310	DM18: Residential extensions and annexes	Comment	We suggest adding heritage significance to the considerations in DM18.1	“Planning permission for residential extensions will be supported, provided that the scale, mass, layout, design and external materials positively respond to the existing dwelling, <u>its heritage significance</u> and locality and do not cause harm to the character of the area.”
312	DM19: Conversion of an existing agricultural or other rural building to residential use	Comment	A minor technicality – we recommend amending “historic significance” to “heritage significance”	“where the building is of <u>heritage</u> <del>historic</del> significance, this significance is conserved or enhanced and any features of architectural or historic merit are retained; and”

531	Other	Comment	We welcome consideration of the historic environment in this context. That said, we emphasise the opportunity for development to impact on the setting of a heritage asset, where the asset is not within the site boundary. We suggest a minor, important change to accommodate this.	“Works or funding for the restoration, conservation/ enhancement of listed buildings, buildings of local importance and monuments at <u>or adjacent to</u> the development site.”
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## APPENDIX B: Detailed comments on the proposed sites in the Regulation 18 plan

Site reference & name	Support / object	Comment
ALT1 – Land at Brick Kiln Lane, Alton	<b>Object</b>	Beyond identifying the presence of nearby listed buildings, it is unclear if the Council has examined the potential impact(s) of development on the significance of the adjacent heritage assets, especially the importance of an open, agricultural setting to the significance of Will Hall Farm and its associated listed buildings. We recommend heritage impact assessment (HIA) as the route through which this can be explored.
ALT2 – Chawton Park Surgery	No comment	
ALT3 – Land adjacent to Alton Sewage Treatment Works, Alton	No comment	
ALT4 – Land at Whitedown Lane, Alton	Comment	We recommend liaison with the Council's archaeological adviser to ensure the archaeological potential of the site has been given adequate consideration, noting the proximity of Roman finds on the Historic Environment Record.
ALT5 – Land at Travis Perkins (Mounters Lodge part)	No comment	
ALT6 – Land at Wilsom Road, Alton	No comment	
ALT7 – Land at Lynch Hill, Alton	No comment	
ALT8 – Land at Neatham Manor Farm, Alton	No comment	
W&B1 – Whitehill & Bordon Town Centre Intensification	<b>Object</b>	<p>We welcome acknowledgement that the site includes buildings that are of local heritage value, providing a valuable and recognisable link to its previous military use. We infer this includes non-designated heritage assets, which should be treated as such, in accordance with local and national planning policy, and used to influence the character of future development.</p> <p>Proportionate HIA would help to inform the proposed development.</p> <p>We note the conclusion on WHI-016 and WHI-017 in the detailed IIA assessment matrix conflicts with the text in the plan, which states that “the site includes buildings that are of local heritage value, providing a valuable and recognisable link to its previous military use.”</p>

W&B2 – Land at the Former Bordon Garrison	<b>Object</b>	Proportionate HIA is needed to support effective place-shaping, taking into account the potential heritage significance of structures of local importance that connect with previous military use (as above), and ensure that any impacts on the setting of nearby Scheduled Monuments are considered.
W&B3 – BOSC Residential Expansion	No comment	
W&B4 – Louisburg Residential Extension	No comment	
W&B5 – North of Louisburg Employment Proposal	No comment	
W&B6 – Land at Lion Court, Farnham Road	No comment	
W&B7 – Land at Hollywater Road and Mill Chase Road	<b>Object</b>	The site is immediately adjacent to the River Wey conservation area and so its development is likely to affect the setting of this designated heritage asset. As stated in the text associated with LIP1, this conservation area is valued for its largely rural historic landscape that was created for farming and industrial purposes. Proportionate HIA is needed to inform the approach to the site's development. Consideration may also need to be given to the ruins associated with Stanford Mill.
W&B8 – Land at the Forest Centre, Whitehill & Bordon	No comment	
HDN1 – Land at Woodcroft Farm	No comment	
HDN2 – Land south of Five Heads Road	<b>Object</b>	We would encourage a sensitive approach to the north western section of the site, minimising the potential for coalescence with Catherington and impact on the character and setting of its conservation area. Proportionate HIA is merited.
HDN3 – Land north of Chalk Hill Road	No comment	
LIP1 – Land north of Haslemere Road, Liphook	<b>Object</b>	We recommend proportionate HIA to inform the approach taken. As stated in the supporting text, this conservation area is valued for its largely rural historic landscape that was created for farming and industrial purposes.
LIP2 – Land west of Headley Road, Liphook	No comment	

LIP3 – Land at Chiltley Farm	No comment	
CFD1 – Land at Clanfield County Farm	No comment	
CFD2 – Land at Drift Road	No comment	
FMS1 – Land west of Lymington Barn	No comment	
FMS2 – Land rear of 97-103 Blackberry Lane	No comment	
FMS3 – Boundaries Surgery	No comment	
FMS4 – Land south of Winchester Road, Four Marks	No comment	
FMS5 – Land at Fordlands, Brislands Lane, Four Marks	No comment	
RLC1 – Land at Deerleap (north)	<b>Object</b>	Proportionate HIA is essential to inform the approach taken, including detailed consideration of potential impacts on the setting of the Scheduled Monument and the character of the conservation area. The study can help to reveal any impacts on the legibility of the Castle and, being a defensive site, how it was designed to command long views, also integrating a suitably detailed archaeological assessment. We note the IIA refers to “major” adverse impacts in the detailed assessment matrix.
RLC2 – Land at Deerleap (south)	<b>Object</b>	Part of the polygon appears to intersect the Scheduled Monument. We assume that this is not intended and will be amended should the site be progressed.  As above, proportionate HIA is essential to inform the approach taken, including detailed consideration of potential impacts on the setting of the Scheduled Monument and the character of the conservation area. The study can help to reveal any impacts on the legibility of the Castle and, being a defensive site, how it was designed to command long views, also integrating a suitably detailed archaeological assessment. We note the IIA refers to “major” adverse impacts in the detailed assessment matrix.
RLC3 – Land at Oaklands House	No comment	
RLC4 – Land at Little Leigh Farm	No comment	



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BEN1 – Land west of Hole Lane, Bentley	<b>Object</b>	Proportionate HIA is needed to inform the allocation.
BWH1 – “Top Field”, land adjacent to Glebe Field	<b>Object</b>	Proportionate HIA is needed to inform the allocation.
BWH2 – Land at the corner of Church Street	<b>Object</b>	Proportionate HIA is needed to inform the allocation.
MSD1 – Land rear of Junipers, Medstead	No comment	
HED1 – Land at Middle Common	No comment	
HOP1 – Land north of Fullers Road, Holt Pound	No comment	
CTN1 – Land at Parsonage Farm	<b>Object</b>	Proportionate HIA is needed to inform the allocation. We note the IIA refers to “major” adverse impacts in the detailed assessment matrix.
CTN2 – Land at the Dairy	<b>Object</b>	Proportionate HIA is needed to inform the allocation
LOV1 – Land rear of 191 - 211 Lovedean Lane	<b>Object</b>	Proportionate HIA is needed to inform the allocation

## APPENDIX C: Comments on the Integrated Impact Assessment (IIA)

In the main IIA report, on page 5, paragraph 1.3.4, we recommend adding a line or two about the other designated heritage assets that are found in East Hampshire, to give a more useful overview.

We support the IIA objectives on pages 17 / 18 of the main report and the decision-making criteria in Appendix D.

We welcome the more detailed assessment of some of the proposed site allocations in Appendix I; however, as stated in our cover letter, we disagree with the conclusion that where major adverse impacts may arise, it is sufficient simply to require a heritage statement with any planning application coming forward. This would not represent a positive strategy for the historic environment, conserving or enhancing heritage assets in line with national policy.

We broadly support the IIA scoping report and provide some further detailed comments in the table below.

Page	Para.	Comment
11	2.2.11	We welcome reference to publications that highlight linkages between the natural and historic environment in terms of climate, biodiversity and heritage. In this regard, examples include Heritage Counts (e.g. <a href="https://historicengland.org.uk/content/heritage-counts/pub/2020/heritage-environment-2020/">https://historicengland.org.uk/content/heritage-counts/pub/2020/heritage-environment-2020/</a> ) and Natural England's publication: <a href="https://worldheritageuk.org/articles/latest-news/nature-recovery-the-historic-environment/">https://worldheritageuk.org/articles/latest-news/nature-recovery-the-historic-environment/</a>
30	2.7.4	A minor point, but the Advice Note referenced (full explanation in footnote 51) is one of the Advice Notes on the planning system, so could be cited as an example rather than in addition to those Advice Notes. The full series can be accessed here: <a href="https://historicengland.org.uk/advice/planning/planning-system/">https://historicengland.org.uk/advice/planning/planning-system/</a>
30	Local context	This could be much more detailed, for example, referring as appropriate to: <ul style="list-style-type: none"> <li>• <a href="#">Historic Environment Record</a></li> <li>• <a href="#">Neighbourhood Character Study</a></li> <li>• <a href="#">Landscape Capacity Study</a></li> <li>• <a href="#">Atlas of Hampshire's Archaeology</a></li> <li>• <a href="#">Hampshire Integrated Character Assessment</a></li> <li>• <a href="#">Historic Settlement Surveys</a></li> <li>• <a href="#">Townscape assessments</a></li> <li>• <a href="#">Hampshire Gardens Trust</a></li> </ul>
103	3.7.3	For clarity, all of the assets on the national register are designated (i.e. linked with the opening sentence of this paragraph). I infer there's only one designated asset in East Hampshire that is outside the National Park. From the Council's website linked with a heritage grants programme, we infer work been done locally to identify assets at risk (including Grade II designated heritage assets that are not Places of Worship, and locally important assets / non-designated heritage assets); however, the status of this work is unclear. More information on heritage at risk would be welcome.
104 & 106	Figures 57 & 58	For clarity, we suggest editing the caption to read "Listed buildings..." rather than "Listed assets".

107	3.7.7 and Figure 59a	We suggest referring to Scheduled Monuments, to align with the NPPF, rather than Scheduled Ancient Monuments. It would be helpful and more informative to colour code the RPGs to convey their Grade.
149 / 150	Heritage key issues	<p>If what is meant is Listed Buildings in the two paragraphs of heritage issues on page 149, I recommend referring to Listed Buildings rather than Listed structures (which could imply assets on the National Heritage List for England).</p> <p>The key issues do not seem to relate in any way to the District's archaeological remains, both Scheduled and non-designated heritage assets; nor do they relate to Registered Parks and Gardens.</p> <p>I infer the second key heritage issue is drawn from a local buildings-at-risk survey. Is that the case? If so, this needs to be mentioned more clearly in the evidence base.</p> <p>Also, I would recommend a key issue linked with how future development can respond sensitively to heritage assets in support of effective place-shaping.</p>



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Date: 6<sup>th</sup> March 2024

Dear Sir/Madam,

**With Reference To: East Hampshire Local Plan Consultation**

The ICB has reviewed the plan and below are our observations and comments for consideration, which we are happy to discuss further if required. The ICB would also like to offer its support for the East Hampshire Local Plan and would like to express our gratitude for the proactive engagement and consultation undertaken by the council. Along with the positive steps taken to ensure that new housing developments provide a healthy environment for people to live, access to primary care services have also been considered and included as part of the Council's planning policies and approach.

We look forward to continuing to work with the council throughout the plan period and to be actively engaged in future discussions with potential developers and to continue to provide updates on the primary care estates strategy.



Head of LPA Engagement

**On behalf of NHS Hampshire and the Isle of Wight Integrated Care Board (ICB)**

<b>Report Title:</b>	East Hampshire – Our Local Plan 2021 - 2040	
<b>Prepared For:</b>	<b>Purpose:</b>	<b>Date:</b>
East Hampshire District Council	Response to draft Local Plan on behalf: NHS Hampshire and Isle of Wight Integrated Care Board (NHS HIOW ICB)	4 <sup>th</sup> March 2024

#### Key Information

<b>Local Planning Authority:</b>	East Hampshire District Council
<b>Consultation Deadline:</b>	<b>8<sup>th</sup> March 2024</b>
<b>Documents:</b>	<a href="#">Have Your Say Today - East Hampshire Local Plan - Commonplace</a>
<b>Key Word Search (Internal Purposes):</b>	N/A

## 1. Purpose

The NHS LPAE team have reviewed this Draft Local Plan from a primary healthcare perspective and the following provides an overview of the extracted key points for NHS Hampshire and Isle of Wight ICB to comment and/or to consider a response/next steps to this consultation.

## 2. Consultation Response

Table 1: General

Section/Page No.	Extract	ICB Consultation Response
28	<p>Objective C:</p> <p>Prioritising the health and well-being of communities in delivering what's needed to support new development.</p> <p>C1: Enable and encourage timely delivery of services and infrastructure to support strong communities.</p> <p>C2: Enable infrastructure (including community facilities) to keep pace with technology and improve and adapt to meet current and future needs.</p>	<p>This is a very positive message that highlights that the LPA fully supports the need for health infrastructure and has made this clear in the inclusion of these objectives. Furthermore, it highlights the issue of timely infrastructure and capacity.</p> <p>These objectives will add more weight to future ICB requests and will be included in the submission templates.</p>
174	<p>07: Enabling Communities to Live Well</p> <p>FIGURE 7.1: DETERMINANTS OF HEALTH</p> <p>20% Clinical Care</p> <ul style="list-style-type: none"> <li>• Access to care</li> <li>• Quality of Care</li> </ul>	<p>The Local Plan makes a reference to the fact that access and quality of care are instrumental in creating healthy communities.</p>
177	<p>7.8</p> <p>Demonstrating that health impacts have been properly considered when preparing, evaluating and determining development proposals.</p> <ul style="list-style-type: none"> <li>• Helping applicants to demonstrate that they have worked closely with those directly affected by their proposals to evolve designs that take account of the views of the community.</li> <li>• Identifying and highlighting any beneficial impacts on health and wellbeing of a particular development scheme.</li> <li>• Identifying and taking action to minimise any negative impacts on health and wellbeing of a particular development scheme.</li> </ul>	<p>The ICB would like to support the completion of the HIA's to ensure that developers have correctly assessed the capacity and quality of care available to support their developments.</p>

Section/Page No.	Extract	ICB Consultation Response
180	<p>08: Delivering Green Connections</p> <p>8.2 Social infrastructure refers to a range of services and facilities that contribute to a good quality of life. It includes:</p> <ul style="list-style-type: none"> <li>health services including acute, primary and secondary health;</li> </ul>	<p>Positive that all aspect of health services have been considered including primary care</p>
180	<p>08: Delivering Green Connections</p> <p>8.5 This Local Plan will play an important role in safeguarding existing infrastructure. It will also <b>ensure that new development includes appropriate infrastructure to meet the needs of a growing population</b>, whilst trying to reduce the reliance on the need to travel by the private car and making travel options that benefit our environment i.e., cycling and walking, a priority. <b>This will be either by delivering infrastructure onsite or nearby or through developer contributions to provide facilities in another sustainable location.</b></p>	<p>The ICB fully supports initiatives that promote a more active and healthier lifestyle. However, ensuring that health facilities are within walking or cycling distance of a new developments is not always going to be either viable or practical. NHS Hampshire and IOW ICB will work with the authority and developers to agree the most appropriate access to health service for future patients.</p>
181	<p>Identifying infrastructure requirements</p> <p>8.6 The Local Planning Authority is working closely with service providers to update the evidence of needs and plan for infrastructure provision.</p> <p>8.7 Most infrastructure providers have a method to estimate what facilities a community will need. For example, future primary health care facilities might be based on an assumption on number of patients per GP, minimum GP practice sizes, accessibility standards and quality of service.</p> <p>Providing our local Integrated Care Board (ICB) with information on estimated population related to new development will determine whether existing facilities are acceptable or whether they require expansion.</p>	<p>The ICB are grateful for the proactive engagement of the authority in developing the Local Plan.</p> <p>As part of the Local Plan process the ICB has actively reviewed the sites and policies and our responses have been included in the draft Local Plan.</p> <p>Future population growth has been considered and calculated using a standard and accepted CIL compliant methodology. Where insufficient capacity has been identified this has been included in the evaluation of the proposed sites.</p>
182	<p>Infrastructure Plan</p> <p>8.8 An emerging infrastructure plan supports this consultation document and it remains a living document which will be updated and amended as and when further information becomes available.</p>	<p>The ICB has contributed to the current IDP and will continue to develop and update its requirements in line with emerging changes to health provision.</p> <p>However, the ICB would like to re-state that there is no funding available to support increasing capacity as a result of new housing and is reliant on developer contributions.</p>

Section/Page No.	Extract	ICB Consultation Response
184	<p>Why we need this Policy</p> <p>8.11 <b>The timely provision of suitable, adequate infrastructure is crucial to the well-being of the Local Plan Area’s population</b>, and of its economy. The emerging Infrastructure Plan summarises the capacity and quality of existing infrastructure, including planned improvements. The non-site specific and more general infrastructure requirements are set out in Appendix H. <b>Historically infrastructure provision and upgrading has not always kept pace with the growth of population</b>, employment and transport demands, and in parts of the Local Plan Area some infrastructure is currently at or near to capacity, or of poor quality.</p> <p>8.12 <b>The Local Planning Authority recognises the importance of ensuring that development is adequately supported by appropriate infrastructure, whether using existing or through new provision.</b></p>	<p>These are all positive statements that demonstrate and support the need for primary care contributions.</p>
186	<p>8.14 Cumulatively, almost all development puts additional pressure on infrastructure and should contribute to addressing that impact. While some infrastructure can be directly provided by, and directly serve a specific development, <b>in many cases it will be necessary to pool funding from several developments</b>. The use of planning obligations and the Community Infrastructure Levy (CIL) have an important role in contributing to the provision of supporting infrastructure.</p>	<p>Due to the nature of patient access to different GP surgeries within their catchment areas, the ICB will be pooling S106 contributions to fund additional capacity but only in line with the three CIL tests. In some circumstances the ICB may also need to request CIL.</p>
187	<p>8.19 Within the Local Plan Area, Community Infrastructure Levy (CIL) is the main source of infrastructure funding through the grant of planning permissions, beyond the immediate needs of the development site. Planning obligations will continue to operate alongside CIL and will be collected for affordable housing provision, which is outside the remit of CIL.</p>	<p>The use of S106 contributions is seen as the only way of securing funds to ensure that there is sufficient capacity to support new patients.</p>
206	<p>TABLE 8.1: MONITORING OF DELIVERING GREEN CONNECTIONS</p> <p>Policy DGC1 Infrastructure:</p> <p>Data source: CIL</p>	<p>Does CIL include planning obligations secured via s106?</p>



Section/Page No.	Extract	ICB Consultation Response
234	Policy H5: Specialist housing 9.72 There <b>is considerable existing provision of older persons accommodation in the district, and more being provided.</b> Whilst there is an ageing population, and a growing general need, it is important that <b>proposals for such accommodation are genuinely meeting specific local needs.</b>	Additional provision for older persons that exceeds the local needs will create an inward migration of people who will have higher levels of health needs and this will lead to increased demands on an already under pressure health system.

## Table 2: Policies

Section/Page No.	Extract	ICB Consultation Response
<b>Policy DES1: Well-Designed Places</b>		
147	<p>DES1.1 New development will be permitted where it would help to achieve the following design vision:</p> <p>Within Tier 1 and 2 settlements enables residents to “live locally” by accessing some services and facilities within convenient walking or cycling distances, taking account of their varied needs</p>	The ICB fully supports initiatives that promote a more active and healthier lifestyle. However, ensuring that health facilities are within walking or cycling distance of a new developments is not always going to be either viable or practical. NHS Hampshire and IOW ICB will work with the authority and developers to agree the most appropriate access to health service for future patients.
<b>Policy HWC1: Health and wellbeing of communities</b>		
175	<p>HWC1.2</p> <p>The council will require a Health Impact Assessment (HIA) setting out the expected effects on health, wellbeing and safety, from all residential developments of 50 homes or more.</p>	The ICB would like to support the completion of the HIA’s to ensure that developers have correctly assessed the capacity and quality of care available to support their developments.
<b>Policy DGC1: Infrastructure</b>		
185	DGC1.1 Infrastructure necessary to support new development will be available when first needed. To achieve this, the delivery of development may need to be phased to reflect the delivery of infrastructure.	The ICB concur that providing additional healthcare infrastructure at the point of need is required. Both existing and new patients of a GP practice will be disadvantaged until such time that additional capacity is provided.
185	DGC1.2 Development proposals must consider all the infrastructure implications of a scheme; not just those on the site or its immediate vicinity.	The ICB welcomes direct involvement with all stakeholders to understand the health requirements for a new development.
185	DGC1.3 The delivery of necessary infrastructure will be secured by planning condition and/or, planning obligation and/or the Community Infrastructure Levy.	The use of S106 contributions is seen as the only way of securing funds to ensure that there is sufficient capacity to support new patients.
185	DGC1.4 When determining planning applications, and attaching appropriate planning conditions and/or planning obligations, regard will be had, to the delivery and timing of delivery of the key infrastructure, or otherwise alternative interventions which provide comparable mitigation.	The ICB will work collaboratively with all stakeholders to establish a viable timeline for delivery of additional capacity as and when required.
185	DGC1.6 If the timely provision of infrastructure necessary to support new development cannot be secured in line with this policy, planning permission will be refused.	The ICB agree with this approach otherwise there is the prospect of harm to both existing and new population due to the lack of health care capacity

Policy DGC3: New and improved community facilities		
196	<p>DGC3.1 Planning permission will be granted for:</p> <p>a. the redevelopment, improvement or expansion of existing community facilities where the development complies with other relevant policies in the plan.</p> <p>b. new community facilities, only where it can be demonstrated that demand cannot be met by existing facilities (whether in current form or improved/expanded/redeveloped). Any new facilities must be designed to be resilient to changing social needs.</p>	<p>The policy corresponds with the ICB model of care where existing facilities are expanded to meet new demand is the preferred way forward.</p> <p>However, when or where there is a need for new facilities then the ICB will work with all stakeholders to explore potential opportunities.</p>

Table 3: Sites

Section/Page No.	Extract	ICB Consultation Response
387	<p><b>W&amp;B7 – Land at Hollywater Road and Mill Chase Road: 126 Homes</b></p> <p>Health: Developer contributions (e.g. by a s.106 contribution) may be required towards improvements at Badgerswood Surgery in Headley.</p>	<p>Badgerswood Surgery in Headley could reconfigure clinic rooms in the main building for GMS use.</p> <p>Medical records could be planned to be taken off site.</p> <p>The annexe could be used for PCN and GMS services</p>
390	<p><b>W&amp;B8 – Land at the Forest Centre, Whitehill &amp; Bordon: 44 Homes</b></p> <p>Health: Developer contributions (e.g. by a s.106 contribution) will be required towards improvements at Pinehill Surgery, which is close proximity to the site.</p>	<p>Pinehill Surgery is a two-storey purpose-built building. Improvements could be:</p> <ul style="list-style-type: none"> <li>• the addition of a lift to use the first-floor office and meeting rooms as consulting space.</li> <li>• Move medical records off site.</li> <li>• Possible building extension into the car park.</li> </ul> <p>The ICB would also like to work with the local authority partners on the master planning of the shopping area and forest centre to understand potential opportunities for primary and community health services</p>
399	<p><b>HDN2 – Land south of Five Heads Road: 118 Homes</b></p> <p>Health: Developer contributions (e.g. as a s.106 contribution) may be required towards additional consulting and treatment rooms at Horndean Surgery.</p>	<p>Horndean Surgery is currently undertaking expansion (internal reconfiguration) works for the surgery and for wider use by the PCN.</p> <p>Additional expansion will be required to support primary care provision within East Hants in the future.</p>
401	<p><b>HDN3 – Land north of Chalk Hill Road: 38 Homes</b></p> <p>Health: Developer contributions (e.g. as a s.106 contribution) may be required towards additional consulting and treatment rooms at Horndean Surgery.</p>	
407	<p><b>LIP1 – Land north of Haslemere Road, Liphook: 24 Homes</b></p> <p>Health: Developer contributions (e.g. by a s.106 contribution) would be required towards projects to increase capacity at Liphook Village surgery.</p>	<p>Plans are being drawn up between HIOW ICB and the local practices.</p> <p>Early discussions have begun on the future provision of primary care accommodation in the Liphook area. Both surgeries are operated by a single Practice/PCN and neither site provide the capacity for future expansion required. New facilities are required to serve the practice population and the practice are considering options for consolidation of</p>
409	<p><b>LIP2 – Land west of Headley Road, Liphook: 20 Homes</b></p> <p>Health: Developer contributions (e.g. by a s.106 contribution) would be required towards projects to increase capacity at Liphook Village surgery.</p>	

Section/Page No.	Extract	ICB Consultation Response
412	<p><b>LIP3 – Land at Chitley Farm: 67 Homes</b></p> <p>Health: Developer contributions (e.g. by a s.106 contribution) would be required towards projects to increase capacity at Liphook Village surgery.</p>	<p>activities to a new purpose-built site. Which will expand the patient infrastructure capacity with potential costs in the region of £6m.</p> <p>Swan Surgery are considering an interim reconfiguration solution with potential costs likely to be in the region of £500k.</p>
418	<p><b>CFD1 – Land at Clanfield County Farm: 100 Homes</b></p> <p>Health: Developer contributions (e.g. by a s.106 contribution) will be required towards a new GP surgery, to replace the existing facility in Clanfield. It is unlikely that The Clanfield Surgery could expand on its current site in order to meet additional demand.</p> <p>Further discussions with healthcare providers will be needed to inform the next stage of the Local Plan and determine how health infrastructure requirements could be met.</p>	<p>The Clanfield Practice is occupying premises that that are no longer fit for purpose and have no capacity for expansion.</p>
421	<p><b>CFD2 – Land at Drift Road: 80 Homes</b></p> <p>Health: Developer contributions (e.g. by a s.106 contribution) will be required towards a new GP surgery, to replace the existing facility in Clanfield. It is unlikely that The Clanfield Surgery could expand on its current site in order to meet additional demand.</p> <p>Due to the proximity of the CFD2 site to central Clanfield, the provision of land for the development of a new surgery should therefore be considered, including within the wider area that has been promoted as site HD-010 in the Land Availability Assessment.</p> <p>Further discussions with healthcare providers will be needed to inform the next stage of the Local Plan and determine how health infrastructure requirements could be met.</p>	<p>In the short term they are exploring possibility of a very small narrow extension on the side of the building or purchase of residential dwellings to increase capacity on the current site.</p> <p>Longer term there are discussions with LA and housing developers regarding the possibility of new build surgery site linked to future local housing development.</p>
427	<p><b>FMS1 – Land west of Lymington Barn: 90 Homes</b></p> <p>Health: Developer contributions (e.g. as a s.106 contribution) may be required towards the extension of Watercress Medical, Mansfield Park Surgery and/or of Boundaries Surgery.</p>	<p>The Watercress Surgery has plans for a small extension and to reconfigure existing footprint to increase GMS space.</p> <p>Boundaries Surgery has had a CIL bid approved by EHDC recently to extend and reconfigure the existing premises to increase GMS space by</p>

Section/Page No.	Extract	ICB Consultation Response
429	<p><b>FMS2 – Land rear of 97-103 Blackberry Lane: 20 Homes</b></p> <p>Health: Developer contributions (e.g. as a s.106 contribution) may be required towards the extension of Watercress Medical, Mansfield Park Surgery and/or of Boundaries Surgery.</p>	<p>36m<sup>2</sup>. This will yield 6 consulting rooms and 3 treatment rooms to improve patient capacity.</p>
434	<p><b>FMS4 – Land south of Winchester Road, Four Marks: 100 Homes</b></p> <p>Health: Developer contributions (e.g. as a s.106 contribution) may be required towards the extension of Watercress Medical, Mansfield Park Surgery and/or of Boundaries Surgery.</p>	
441	<p><b>RLC1 – Land at Deerleap (north): 5 Homes</b></p> <p>Health: Developer contributions (e.g. by a s.106 contribution) will be required towards improvements at Rowlands Castle Surgery, to provide additional capacity.</p>	<p>Rowlands Castle Surgery is a two-storey converted house with a private pharmacy and a tenanted first floor apartment.</p> <p>Discussions with the GP partners to vacate the apartment and relocate administration on the first floor, releasing ground floor space for clinical use could give a short-term increase in patient infrastructure capacity.</p> <p>Moving medical records off site would also improve patient space.</p>
444	<p><b>RLC2 – Land at Deerleap (south): 8 Homes</b></p> <p>Health: Developer contributions (e.g. by a s.106 contribution) will be required towards improvements at Rowlands Castle Surgery, to provide additional capacity.</p>	
447	<p><b>RLC3 – Land at Oaklands House: 51 Homes</b></p> <p>Health: Developer contributions (e.g. by a s.106 contribution) will be required towards improvements at Rowlands Castle Surgery, to provide additional capacity.</p>	
450	<p><b>RLC4 – Land at Little Leigh Farm: 81 Homes</b></p> <p>Health: Developer contributions (e.g. by a s.106 contribution) may be required towards improvements at Rowlands Castle Surgery, to provide additional capacity. However, developer contributions may instead be required towards health infrastructure within the Havant Borough Council area, if identified through on-going ‘duty to co-operate’ discussions.</p>	

Section/Page No.	Extract	ICB Consultation Response
464	<p><b>MSD1 – Land rear of Junipers, Medstead: 15 Homes</b></p> <p>Health: Developer contributions (e.g. as a s.106 contribution) may be required towards the extension of Watercress Medical, Mansfield Park Surgery and/or of Boundaries Surgery.</p>	<p>The Watercress Surgery has plans for a small extension and to reconfigure existing footprint to increase GMS space.</p> <p>Boundaries Surgery has had a CIL bid approved by EHDC recently to extend and reconfigure the existing premises to increase GMS space by 36m<sup>2</sup>. This will yield 6 consulting rooms and 3 treatment rooms to improve patient capacity.</p>
471	<p><b>HOP1 – Land north of Fullers Road, Holt Pound: 19 Homes</b></p> <p>Health: Developer contributions (e.g. by a s.106 contribution) may be required towards improvements at Rowlands Castle Surgery, to provide additional capacity. However, developer contributions may instead be required towards health infrastructure within the Waverley Borough Council area, if identified through on-going ‘duty to co-operate’ discussions.</p>	<p>Rowlands Castle Surgery is a two-storey converted house with a private pharmacy and a tenanted first floor apartment.</p> <p>Discussions with the GP partners to vacate the apartment and relocate administration on the first floor, releasing ground floor space for clinical use could give a short-term increase in patient infrastructure capacity.</p> <p>Moving medical records off site would also improve patient space.</p>
477	<p><b>CTN1 – Land at Parsonage Farm: 6 Homes</b></p> <p>Health: Developer contributions (e.g. by a s.106 contribution) will be required towards either the extension of Horndean Surgery or a replacement surgery at Clanfield.</p>	<p>The Clanfield Practice is occupying premises that have no capacity for expansion and that are no longer fit for purpose.</p> <p>In the short term they are exploring possibility of a very small narrow extension on the side of the building or purchase of residential dwellings to increase capacity on the current site.</p>
479	<p><b>CTN2 – Land at the Dairy: 7 Homes</b></p> <p>Health: Developer contributions (e.g. by a s.106 contribution) will be required towards either the extension of Horndean Surgery or a replacement surgery at Clanfield.</p>	<p>Longer term there are discussions with LA and housing developers regarding the possibility of new build surgery site linked to future local housing development.</p> <p>Horndean Surgery is currently undertaking expansion (internal reconfiguration) works for the surgery and for wider use by the PCN.</p> <p>Additional expansion will be required to support primary care provision within East Hants in the future.</p>
482	<p><b>LOV1 – Land rear of 191 - 211 Lovedean Lane: 30 Homes</b></p> <p>Health: Developer contributions (e.g. as a s.106 contribution) may be required towards additional consulting and treatment rooms at Horndean Surgery.</p>	<p>Horndean Surgery is currently undertaking expansion (internal reconfiguration) works for the surgery and for wider use by the PCN.</p> <p>Additional expansion will be required to support primary care provision within East Hants in the future.</p>

Table 4: Appendices

Section/Page No.	Extract	ICB Consultation Response
527	<p><b>Appendix H: Infrastructure Requirements</b></p> <p><b>Health</b></p> <p>Where a proposed development generates the need for a new healthcare facility, such as a new GP surgery, to be provided on site, the land and provision of a healthcare facility will be secured through a S106 Agreement.</p> <p>Where a proposed development generates the need to extend a healthcare facility, such as a GP surgery, a contribution towards that extension will be secured through a S106 Agreement. Other generic financial contributions towards health are made via CIL.</p>	<p>The ICB will work alongside the council and developers to ensure that new healthcare facilities and land meets the needs of the local patients. It will also need to be consulted on the terms of the S106 to ensure that there is no financial burden on either the ICB or the GP partners.</p>



Our Ref: MV/ 15B901605

27 February 2024



East Hampshire District Council

[LocalPlan@easthants.gov.uk](mailto:LocalPlan@easthants.gov.uk)**via email only**

Dear Sir / Madam

**Local Plan 2021-2040 Draft Regulation 18 Consultation  
January - March 2024  
Representations on behalf of National Gas Transmission**

National Gas Transmission has appointed Avison Young to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

**About National Gas Transmission**

National Gas Transmission owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.

**Utilities Design Guidance**

The increasing pressure for development is leading to more development sites being brought forward through the planning process on land that is crossed by National Gas Transmission infrastructure.

National Gas Transmission advocates the high standards of design and sustainable development forms promoted through national planning policy and understands that contemporary planning and urban design agenda require a creative approach to new development around underground gas transmission pipelines and other National Gas Transmission assets.

Therefore, to ensure that Design Policy DES1 is consistent with national policy we would request the inclusion of a policy strand such as:

*"x. taking a comprehensive and co-ordinated approach to development including respecting existing site constraints including utilities situated within sites."*

**Further Advice**

National Gas Transmission is happy to provide advice and guidance to the Council concerning their networks.

Please see attached information outlining further guidance on development close to National Gas Transmission assets.



If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.

To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Gas Transmission wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets. Please remember to consult National Gas Transmission on any Development Plan Document (DPD) or site-specific proposals that could affect National Gas Transmission's assets.

We would be grateful if you could add our details shown below to your consultation database, if they are not already included:

**[Redacted] Director**

[nationalgas.uk@avisonyoung.com](mailto:nationalgas.uk@avisonyoung.com)

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Forth Street  
Newcastle upon Tyne  
NE1 3PJ

**[Redacted] Asset Protection Lead**

[\[Redacted\]@nationalgas.com](mailto:[Redacted]@nationalgas.com)

National Gas Transmission  
National Grid House  
Warwick Technology Park  
Gallows Hill  
Warwick, CV34 6DA

If you require any further information in respect of this letter, then please contact us.

Yours faithfully,

**Director**

**[Redacted]**

**[Redacted]@avisonyoung.com**

**For and on behalf of Avison Young**

National Gas Transmission is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

#### Gas assets

High-Pressure Gas Pipelines form an essential part of the national gas transmission system and National Gas Transmission's approach is always to seek to leave their existing transmission pipelines in situ. Contact should be made with the Health and Safety Executive (HSE) in respect of sites affected by High-Pressure Gas Pipelines.

National Gas Transmission have land rights for each asset which prevents the erection of permanent/ temporary buildings, or structures, changes to existing ground levels, storage of materials etc. Additionally, written permission will be required before any works commence within the National Gas Transmission's 12.2m building proximity distance, and a deed of consent is required for any crossing of the easement.

National Gas Transmission's '*Guidelines when working near National Gas Transmission assets*' can be downloaded here: <https://www.nationalgas.com/document/82951/download>

#### How to contact National Gas Transmission

If you require any further information in relation to the above and/or if you would like to check if National Gas Transmission's transmission networks may be affected by a proposed development, please visit the website: <https://lsbud.co.uk/>

For local planning policy queries, please contact: [nationalgas.uk@avisonyoung.com](mailto:nationalgas.uk@avisonyoung.com)

Our Ref: MV/ 15B901605

27 February 2024



East Hampshire District Council

[LocalPlan@easthants.gov.uk](mailto:LocalPlan@easthants.gov.uk)

**via email only**

Dear Sir / Madam

**Local Plan 2021-2040 Draft Regulation 18 Consultation**

**January – March 2024**

**Representations on behalf of National Grid**

National Grid Electricity Transmission has appointed Avison Young to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

**About National Grid Electricity Transmission**

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators, so it can reach homes and businesses.

National Grid no longer owns or operates the high-pressure gas transmission system across the UK. This is the responsibility of National Gas Transmission, which is a separate entity and must be consulted independently.

National Grid Ventures (NGV) develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States. NGV is separate from National Grid's core regulated businesses. Please also consult with NGV separately from NGET.

**Proposed development sites crossed or in close proximity to NGET assets:**

Following a review of the above Development Plan Document, we have identified that one or more proposed development sites are crossed or in close proximity to NGET assets. Details of the sites affecting NGET assets are provided below.

Development Plan Document Site Reference	Asset Description
<b>CFD2 - Land at Drift Road</b>	<b>4VF ROUTE TWR (001 - 190): 400Kv Overhead Transmission Line route: BOLNEY - LOVEDEAN 1</b>

A plan showing details of the site locations and details of NGET assets is attached to this letter. Please note that this plan is illustrative only.

Without appropriate acknowledgement of the NGET assets present within the site, these policies should not be considered effective as they cannot be delivered as proposed; unencumbered by the constraints posed by the presence of NGET infrastructure.

We propose modifications to the above site allocations and/or policies to include wording to the following effect:

**CFD2 – Land at Drift Road**

*"2. The development will be developed with the following site-specific criteria*

*j. a strategy for responding to the NGET overhead transmission line present within the site which demonstrates how the NGET Design Guide and Principles have been applied at the masterplanning stage and how the impact of the assets has been reduced through good design."*

Please see attached information outlining further guidance on development close to NGET assets.

NGET also provides information in relation to its assets at the website below.

- <https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure/network-route-maps>

**Utilities Design Guidance**

The increasing pressure for development is leading to more development sites being brought forward through the planning process on land that is crossed by NGET infrastructure.

NGET advocates the high standards of design and sustainable development forms promoted through national planning policy and understands that contemporary planning and urban design agenda require a creative approach to new development around high voltage overhead lines and other NGET assets.

Therefore, to ensure that Design Policy DES1 is consistent with national policy we would request the inclusion of a policy strand such as:

*"p. take a comprehensive and co-ordinated approach to development including respecting existing site constraints including utilities situated within sites."*

**Further Advice**

NGET is happy to provide advice and guidance to the Council concerning their networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.



To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, NGET wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets. Please remember to consult NGET on any Development Plan Document (DPD) or site-specific proposals that could affect NGET's assets. We would be grateful if you could check that our details as shown below are included on your consultation database:

**██████████ Director**

[nationalgrid.uk@avisonyoung.com](mailto:nationalgrid.uk@avisonyoung.com)

Avison Young  
Central Square  
Forth Street  
Newcastle upon Tyne  
NE1 3PJ

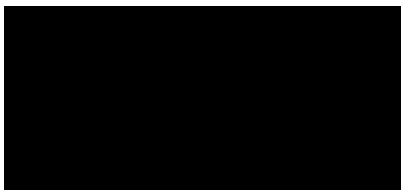
**██████████ Development Liaison Officer**

[box.landandacquisitions@nationalgrid.com](mailto:box.landandacquisitions@nationalgrid.com)

National Grid Electricity Transmission  
National Grid House  
Warwick Technology Park  
Gallows Hill  
Warwick, CV34 6DA

If you require any further information in respect of this letter, then please contact us.

Yours faithfully,



**Director**



**██████████@avisonyoung.com**

**For and on behalf of Avison Young**

NGET is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

Developers of sites crossed or in close proximity to NGET assets should be aware that it is NGET policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance.

NGET's *'Guidelines for Development near pylons and high voltage overhead power lines'* promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here: <https://www.nationalgrid.com/document/130626/download>

The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

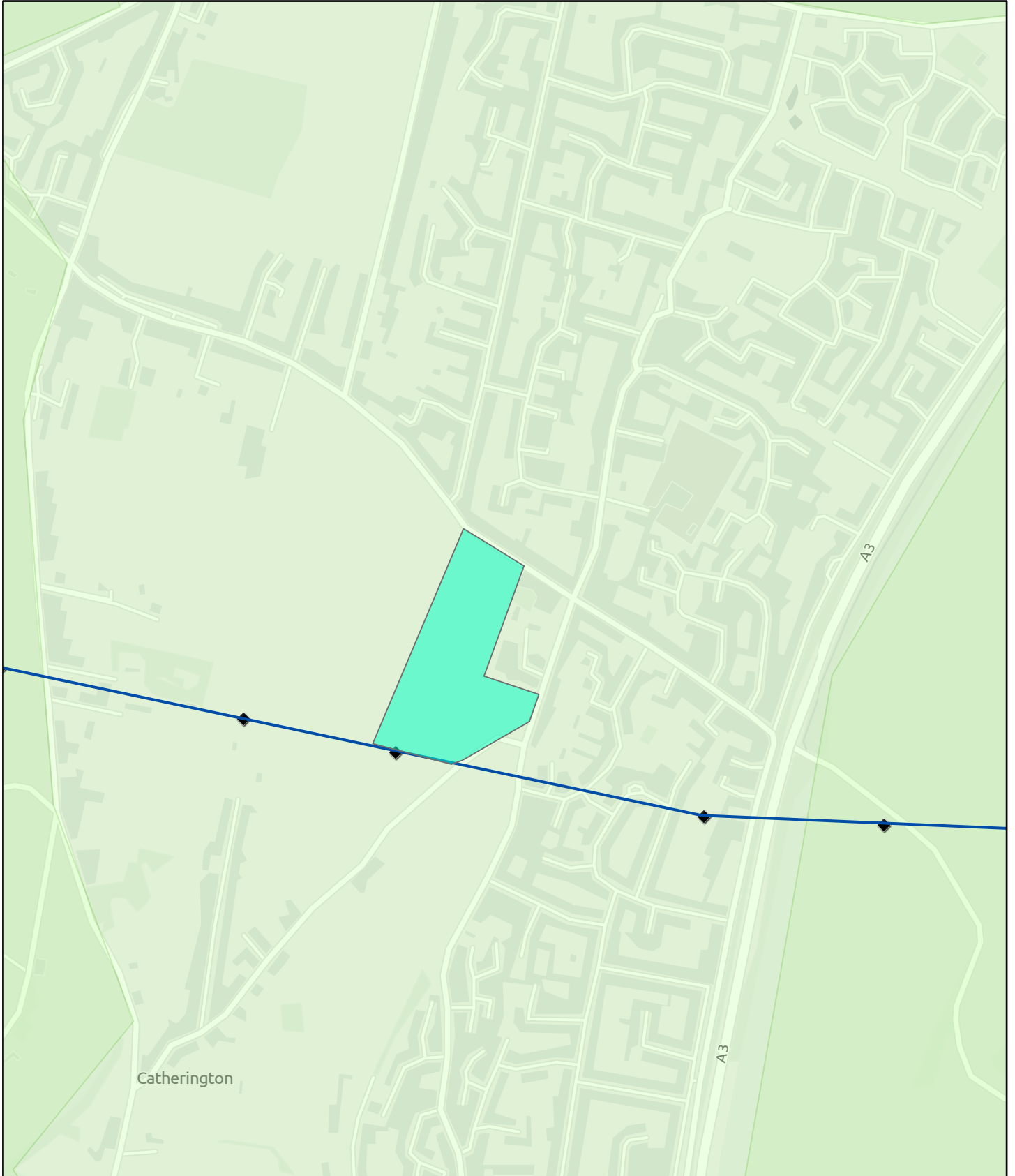
NGET's statutory safety clearances are detailed in their *'Guidelines when working near National Grid Electricity Transmission assets'*, which can be downloaded here: [www.nationalgrid.com/network-and-assets/working-near-our-assets](http://www.nationalgrid.com/network-and-assets/working-near-our-assets)

#### How to contact NGET

If you require any further information in relation to the above and/or if you would like to check if NGET's transmission networks may be affected by a proposed development, please visit the website: <https://lsbud.co.uk/>

For local planning policy queries, please contact: [nationalgrid.uk@avisonyoung.com](mailto:nationalgrid.uk@avisonyoung.com)

# CFD2 - Land at Drift Road



27/02/2024, 11:39:08

Development\_Plan\_Monitoring\_v2\_7386  
Electric\_Assets\_4020

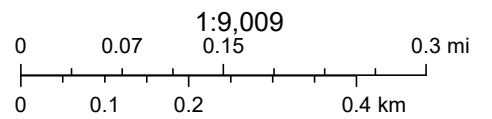
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## National Highways Limited - NH/24/04680 and NH/24/04972 East Hampshire Draft Local Plan Regulation 18 Part 2 Consultation

[REDACTED]@nationalhighways.co.uk>

Thu 29/02/2024 13:49

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

Cc:Planning SE <planningse@nationalhighways.co.uk>; [REDACTED]

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

Dear [REDACTED]

I refer to your emails, dated 22nd January and 6th February 2024 and thank you for contacting National Highways regarding the East Hampshire Local Plan 2040 – Regulation 18 Consultation (January 2024).

National Highways has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such National Highways works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. We will therefore be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN, in this case the A3(M).

Overall, in accordance with national policy, we look to your Local Plan to promote strategies, policies and land allocations that will support alternatives to the car and the operation of a safe and reliable transport network. We welcome the Council's vision to provide sustainable development with a focus on reducing carbon emissions whilst promoting active travel and public transport use to limit car journeys and congestion locally, and on the wider network. The updated DfT Circular 01/2022 reflects this and notes that new development should be facilitating a reduction in the need to travel by private car and focused on locations that are or can be made sustainable.

We have reviewed the available information for the East Hampshire Draft Local Plan Regulation 18 Part 2 Consultation.

### Development Options and Policies

We previously responded to the East Hampshire Draft Local Plan – Issues & Priorities consultation on 13th January 2023. The Local Plan at that stage did not have site allocations or an understanding of the impact to safety or capacity on the local or strategic highway networks. The current Local Plan consultation now includes site allocations and includes a transport evidence base, which we have commented on below. Policy S1 – 'Spatial Strategy' states that provision will be made for the delivery of 9,082 new homes across the plan period (2021-2040).

With the information presented in relation to site allocations and the Infrastructure Development Plan (IDP), we do not have any objections to the principle of the draft development allocations, nor the dwelling numbers. We would be concerned if any material increase in traffic were to occur on the SRN or at its junctions because of planned growth, without careful consideration of mitigation measures. It is important that the Local Plan provides the planning policy framework to ensure development cannot progress without the

appropriate infrastructure being in place. When considering proposals for growth, any impacts on the SRN will need to be identified and mitigated as far as reasonably possible. We will support a local authority proposal that considers sustainable measures, which manage down demand and reduce the need to travel. Infrastructure improvements on the SRN should only be considered as a last resort. Proposed new growth will need to be considered in the context of the cumulative impact from already proposed development on the SRN.

National Highways support the inclusion of Policy DGC1 'Infrastructure' which effectively prevents development from occurring until necessary infrastructure is available. We also support DGC2 'Sustainable Transport' which relates to the provision of sustainable transport infrastructure and ensures transport impacts of new development can be recognised and used to shape the proposals at an early stage.

## Transport Evidence Base

A Transport Assessment Methodology document and Transport Background Paper have been provided as part of this consultation. Together, these documents set out the options for assessing the Local Plan's impact on the highway network and makes an overall recommendation on how it should be assessed. We note that these documents suggest different approaches to assessment for the northern and southern planning areas of East Hampshire. For the northern area, it is suggested to use the North Hampshire Transport Model (NHTM), which will use a traffic assignment method with detailed junction modelling for junction impact analysis and to identify and refine mitigation. Meanwhile for the southern area, it is proposed to use the Solent Sub-Regional Transport Model (SRTM), which uses a multi-modal modelling method with detailed junction modelling only to identify and refine mitigation. Given the unique nature of East Hampshire having disconnected planning authority areas and the existing models available in each area, we support this proposed approach.

We do however have some concerns about the proposed methodology which need to be addressed. It is not clear what the base and forecast years are for each of the models. If these are different there will need to be a robust way of ensuring comparability between the two models.

Additionally, we need to know how the two models interact with one another. Specifically, will development in the northern planning area be included in the southern model, and vice-versa. If development is included, we will need to know the details of how this has been modelled, whilst if it is not included, we will need to know how the development will be otherwise accounted for.

Moreover, it is essential that once the modelling work has been undertaken, we have full and detailed outputs to review. This should include:

- Turning movement flows;
- Junction delays, and;
- Maximum (not average) queue length at junctions.

We have undertaken a review of the document 'East Hampshire Living Locally Accessibility Study and Decide & Provide Methodology' and request that a meeting is arranged in order for us to discuss the proposed transport approach before any further work is undertaken.

Furthermore we have reviewed Table 3 regarding identified infrastructure required to date on the SRN of the IDP and are pleased to see a commitment and statement from EHDC to "liaise with National Highways when undertaking the districts cumulative Transport Assessment and share the resulting outcomes. Any highway mitigation schemes required as an outcome of proposed growth in the Local Plan will be fully investigated and the most appropriate and sustainable scheme sought, in conjunction with National Highways.

To ensure that the Local Plan is deliverable, a transport evidence base should be provided to demonstrate the Local Plan impact on the SRN and as necessary identify suitable mitigation. This work will form a key piece of evidence to demonstrate the Local Plan is sound, therefore it is important that any identified mitigation has a reasonable prospect of delivery within the timescales of when the identified growth is planned. Once the transport impacts of the Local Plan sites are understood, the Infrastructure Delivery Plan document should set out any SRN mitigation required to deliver the Local Plan development. We would welcome the opportunity to discuss this ahead of the next Local Plan consultation.

## Specific Development Proposals

We have reviewed the specific site allocations in the Draft Local Plan. There are a number of developments in the Draft Local Plan that potentially could impact the SRN both individually and cumulatively. It should be ensured that Local Plan policy advises Transport Assessments or Transport Statements, comprising an assessment of the expected impact on the SRN, are submitted alongside planning applications for all developments that could impact the SRN.

When identifying the preferred strategy for the spatial options, consideration will need to be given to assessing the cumulative impact of new sites that might be taken forward together with already planned growth on the SRN. We welcome further dialogue on potential growth options. When considering proposals for growth, any impacts on the SRN will need to be identified and mitigated as far as reasonably practicable. As previously stated, we will support proposals that consider sustainable measures which manage down demand and reduces the need to travel. Infrastructure improvements on the SRN should only be considered as a last resort. Proposed new growth will need to be considered in the context of the cumulative impact from already proposed development on the SRN. We look forward to discussions to ensure that the impacts to the SRN from proposals are fully considered and that an appropriate package of mitigation measures are identified.

## Conclusion

National Highways are happy to engage collaboratively with EHDC to ensure the Council's transport evidence provides a robust and proportionate assessment of the impacts of the emerging development strategy in the Local Plan on the SRN. This can help the production of a positively prepared and justified development strategy. It is important that this work is informed by national policy, including DfT Circular 01/2022 as well as the updated NPPF (December 2023). To help the Council understand how National Highways engages with plan-making, please read our aforementioned updated Planning Guide: [https://nationalhighways.co.uk/media/2depj2hh/final-cre23\\_0370-nh-planning-guide-2023.pdf](https://nationalhighways.co.uk/media/2depj2hh/final-cre23_0370-nh-planning-guide-2023.pdf)

We look forward to meeting with you to discuss the transport assessment methodology, participating in future discussions regarding these matters and in the meantime, if you have any questions with regards to the comments made in this response, please do not hesitate to contact National Highways using [planningse@nationalhighways.co.uk](mailto:planningse@nationalhighways.co.uk).

Regards

### Area 3 Spatial Planner

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Date: 05 March 2024  
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Planning Policy - [localplan@easthants.gov.uk](mailto:localplan@easthants.gov.uk)

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

## BY EMAIL ONLY

Dear Sir/Madam

### East Hampshire Local Plan 2040 - Regulation 18, Consultation on the draft Local Plan

Thank you for your consultation on the above dated 11 January 2024 which was received by Natural England on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Below we set out our specific comments on the draft Local Plan's Vision, Objectives, Policies, Site Allocations, the Habitats Regulations Assessment (HRA) and the Integrated Impact Assessment.

### **Comments on the Habitats Regulations Assessment – Reg 18**

#### **Screening for Likely Significant Effects (LSEs)**

- *Recreational Pressure*

#### *East Hampshire Hangers SAC*

Natural England recognise that the strategic site allocation in Alton for 1000 dwellings – *Land at Neatham Manor Farm* – partially falls within the smaller catchment of the East Hampshire Hangers SAC for recreational pressure. It is understood that a conclusion of no LSEs has been made due to a significant lack of car parks near these sites restricting visits by car, and because of the extensive network of existing Public Right of Ways (PRoWs) to service those visiting by foot. A further argument is reliant on the fact that more suitable alternative natural greenspace (SANG) will become available in accordance with delivering housing in and around the heathlands, which will offer further alternative recreational options for visitors. It is our advice that LSEs could be present as a result of the strategic housing allocation in Alton, referenced above.

Based off the information provided, **Natural England advise that there could be potential for LSEs of the Reg.18 Local Plan on the East Hampshire Hangers SAC from recreational pressure.** It is our advice that further information is necessary to assess the potential LSEs at this screening stage in order to determine if this should proceed through to the Appropriate Assessment stage, or whether it can be screened out from further assessment.

- *Water Quality*

### *River Itchen SAC*

Natural England note that *paragraph 5.31* appropriately discusses water pollution as the primary threat to the River Itchen SAC, with a key focus on phosphorus and also nitrogen given that the SAC discharges to the Solent designated sites. With regards to eutrophication, phosphorus is currently a limiting factor within the River Itchen SAC and as such development within its catchment must demonstrate how it meets nutrient neutrality for the lifetime of development for both nitrogen and phosphorus loading.

A conclusion of no LSEs on the River Itchen SAC has been made, with an argument that only less than 5% of the allocated site *FMS4 – Land south of Winchester Road, Four Marks (100 dwellings)* falls within the catchment. This justification has not acknowledged the allocated site *FMS1 – Land west of Lymington Barn (90 dwellings)* of which approximately half of the site falls within the River Itchen SAC catchment. This assessment has not fully considered the potential for Likely Significant Effects from both of these development sites in Four Marks. This assessment should consider the potential LSEs of increased nitrogen and phosphorus loading from wastewater generation and surface water runoff.

It is understood from *paragraph 5.34* that these developments will not be able to be served by a wastewater treatment works and will therefore be served by a private, on-site Package Treatment Plant (PTP). There is uncertainty on where this will ultimately be discharging to, and therefore, based on the current evidence it is possible that LSEs could occur on the River Itchen SAC.

**Natural England currently disagree with the conclusions that Likely Significant Effects of the Reg.18 Local Plan on the River Itchen SAC regarding water quality can be excluded. Further assessment of this impact pathway through Appropriate Assessment will be required to demonstrate that any potential adverse impacts can be appropriately avoided or mitigated.**

### ***Appropriate Assessment***

- *Recreational Pressure*

*Wealden Heaths Phase II SPA, Woolmer Forest SAC and Shortheath Common SAC & Thursley, Hankley & Frensham Commons SPA and Thursley, Ash, Pirbright & Chobham SAC*

Natural England recognise that further work is required to fully assess potential impacts to the above designated sites from additional recreational pressure and the scope for appropriate avoidance and mitigation measures. We recommend that you demonstrate consistency between the assessment of the Wealden Heaths Phase I and Phase II sites. We conclude that your Appropriate Assessment has not achieved a consistent assessment or conclusion across the full Wealden Heaths complex. We advise that further assessment on mitigation potential is required. Natural England welcome the opportunity to continue working with the Council on the strategic approach to achieving these widespread mitigation requirements.

**We cannot currently conclude on the outcome of the Appropriate Assessment on the Wealden Heaths Phase I and Phase II SPA and SAC sites in regard to recreational pressure.**

**Natural England advise that further assessment on the mitigation strategy underpinning Policy NBE4 for the Wealden Heaths SPA and SAC sites is required in order to conclude no adverse effects on site integrity from recreational pressure under this Reg.18 Local Plan.** Natural England would be happy to continue working with the Council when appropriate.

- *Water Quality*

It is understood that the majority of development proposed as part of this Plan will be served by

Budds Farm WwTWs, which discharges into the Solent at Langstone Harbour. The assessment here concludes that the increase in total nitrogen load from the housing growth proposed through the 11 site allocations discharging into the Solent catchment is estimated at 410 kg TN/year. It is concluded that each individual development must appropriately demonstrate that it achieves nutrient neutrality.

It is correctly discussed in *paragraph 6.57* that the Plan will need to include the provision of land, within the East Hampshire operational catchment, which can be used to off-set the estimated nitrogen loading of 410 kg TN/year through an evidenced and secure land use change strategy. Natural England recognise that the Plan is yet to make any confirmation of such nutrient mitigation strategy. The Appropriate Assessment has therefore been unable to reach any conclusion. Please note that the approximate figure of 410 kg TN/year has not considered the potential nutrient loading from the two allocations in Four Marks (*FMS1 & FMS4*) which sit on the River Itchen SAC catchment.

In accordance with our previous recommendations, we advise that the Plan includes a nutrient management plan or similar strategy to offset the delivery of increased nutrients caused by the proposed Local Plan development, and to achieve nutrient neutrality through its Appropriate Assessment.

**We cannot currently conclude on the outcome of the Appropriate Assessment on the Solent designated sites regarding water quality, due to a lack of information. We advise that further information is provided to demonstrate that the proposed allocated developments will be able to achieve nutrient neutrality.**

**Natural England advise that further assessment on a nutrient management and mitigation strategy underpinning *Policy NBE9* for the Solent designated sites is required in order to conclude no adverse effects on site integrity from water quality.**

- *Atmospheric Pollution*

Natural England recognise that LSEs have been identified for the Wealden Heaths SPA and SAC sites, Thursley, Hankley & Frensham Commons SPA, Thursley, Ash, Pirbright & Chobham SAC, East Hampshire Hangers SAC, Butser Hill SAC and the Thames Basin Heaths SPA regarding atmospheric pollution. The Appropriate Assessment under this Reg.18 Local Plan submission has not yet considered atmospheric pollution or any air quality modelling. We therefore cannot draw any conclusions at this stage and further work is necessary.

**Natural England advise that further assessment on the potential impacts of the draft Local Plan on European designated sites from atmospheric pollution is required.**

Natural England welcome the opportunity to continue working with the Council on this as the further assessment and any air quality modelling progress. Please find below our advice and guidance to assist you in addressing atmospheric pollution and air quality through your HRA.

We would expect the plan to address the impacts of air quality on the natural environment. In particular, it should address the traffic impacts associated with new development, particularly where this impacts on European sites and SSSIs. The environmental assessment of the plan (SA and HRA) should also consider any detrimental impacts on the natural environment and suggest appropriate avoidance or mitigation measures where applicable.

Natural England advises that one of the main issues which should be considered in the plan and the SA/HRA are proposals which are likely to generate additional nitrogen emissions as a result of increased traffic generation, which can be damaging to the natural environment.

The effects on local roads in the vicinity of any proposed development on nearby designated nature conservation sites (including increased traffic, construction of new roads, and upgrading of existing

roads), and the impacts on vulnerable sites from air quality effects on the wider road network in the area (a greater distance away from the development) can be assessed using traffic projections and the 200m distance criterion followed by local Air Quality modelling where required. We consider that the designated sites at risk from local impacts are those within 200m of a road with increased traffic<sup>1</sup>, which feature habitats that are vulnerable to nitrogen deposition/acidification. [APIS](#) provides a searchable database and information on pollutants and their impacts on habitats and species.

It is advised that assessment, alone and in combination with other plans and projects, should be carried out in line with Natural England [guidance](#) that provides a simple step by step approach to assessing road traffic emissions under the Habitats Regulations. All designated sites that may be impacted by the affected road network within a reasonable buffer zone should be screened in for consideration under the Local Plan appropriate assessment.

Please note that ammonia (NH<sub>3</sub>) from traffic emissions should also be assessed as the impact from this source on designated sites is currently unclear. It is advised air quality impacts on interest features of nationally and locally designated sites is also carried out as part of an assessment of impacts on SSSIs and wider biodiversity.

### **Comments on the draft Reg.18 Local Plan – Site Allocations**

Natural England have assessed the proposed site allocations under this Reg.18 Local Plan. We have produced a theme of ecological receptors in which the allocations must appropriately consider through this Plan. We have listed the allocation sites in which fit under each ecological receptor to ensure that these are considered by the Council fully.

\*We have provided additional comment only on those specific allocations that require a bespoke input.

### **Recreational pressure**

#### ***Wealden Heaths SPA and SAC sites***

The following site allocations fall within 5km of the Wealden Heaths SPA and SAC sites, including Shortheath Common SAC. Natural England agree that recreational disturbance produced by these allocations on the Wealden Heaths SPA and SAC sites will need to be appropriately mitigated in accordance with *Policy NBE4*.

**Any bespoke mitigation package will need to be agreed with Natural England for each site and secured in perpetuity. For all site allocations located within 5km of Wealden Heaths SPA/SAC sites, mitigation will likely be necessary. We look forward to working with the Council to review the proposed mitigation strategies in detail.**

- ***ALT8 – Land at Neatham Manor Farm, Alton (1000 dwellings including 6 travelling Showpeople plots)***
- ***W&B1 – Whitehill & Bordon Town Centre Intensification (317 dwellings)***
- ***W&B2 – Land at the Former Bordon Garrison (115 dwellings)***
- ***W&B3 – BOSC Residential Expansion (38 dwellings)***
- ***W&B4 – Louisburg Residential Extension (27 dwellings)***
- ***W&B7 – Land at Hollywater Road and Mill Chase Road (126 dwellings and SANG) [application permitted for up to 147 dwellings]***
- ***W&B8 – Land at the Forest Centre (44 dwellings)***
- ***LIP1 – Land north of Haslemere Road (24 dwellings)***
- ***LIP2 – Land west of Headley Road (20 dwellings)***
- ***LIP3 – Land at Chitley Farm (67 dwellings) [application live for up to 100 dwellings and***

<sup>1</sup> The ecological effects of diffuse air pollution (2004) English Nature Research Report 580  
Design Manual for Roads and Bridges Volume 11, Section 3 Part 1 (2007), Highways Agency

SANGj

- **HED1 – Land at Middle Common (6 Travelling Showpeople plots)**
- **HOP1 – Land north of Fullers Road, Holt Pound (19 dwellings)**

**\*ALT8 – Land at Neatham Manor Farm, Alton (1000 dwellings incl. 6 Showpeople plots):**

Natural England recognise that the whole site allocation falls within 5km of Shortheath Common and approximately 25% of the site falls within 5km of Broxhead and Kingsley Commons SSSI. Natural England acknowledge that further work is being commissioned by the Council to evaluate the buffer zones on Shortheath Common SAC regarding recreational pressure from new housing development.

Natural England welcome the opportunity to continue discussions with the Council on the mitigation requirements. Strategic site allocations such as this often come forward in phases, and therefore any mitigation package will need to ensure that each phase of development will be fully mitigated itself, prior to first occupation, in order to conclude no adverse effects on Wealden Heaths SPA site integrity.

**\*HED1 – Land at Middle Common (6 Travelling Showpeople plots):**

Natural England are concerned that this allocation includes land within 400m of the designated site, where residential development should not be permitted. Further information should be provided to show whether this site could be deliverable without contravening proposed Policy NBE4. As currently submitted, this site does not appear to be an appropriate allocation.

### **Solent SPA sites**

Natural England agree that these following site allocations all fall within 5.6km to the Solent SPA sites. It is therefore necessary that these developments address impacts on the SPA sites from increased recreational pressure in accordance with *Policy NBE6*. **Natural England would expect full contributions to the Solent Recreation Mitigation Partnership (SRMP), now known as Bird Aware Solent to be secured.**

- **RLC1 – Land at Deerleap (north) (5 dwellings)**
- **RLC2 – Land at Deerleap (south) (8 dwellings)**
- **RLC3 – Land at Oaklands House (51 dwellings)**
- **RLC4 – Land at Little Leigh Farm (81 dwellings)**

### Catherington Down SSSI

These site allocations sit in close proximity to Catherington Down SSSI. Natural England recommend that the Council have due regard to the proximity of this SSSI and any impacts that could occur as a result of these allocations on its special interest features.

- **CTN1 – Land at Parsonage Farm (6 dwellings)**
- **CTN2 – Land at the Dairy (7 dwellings)**

### Nutrient neutrality

#### **Solent designated sites (SPA/SAC/Ramsar)**

The site allocations listed below fall within the Solent catchment area and are subject to demonstrating robustly that they achieve nutrient neutrality, in accordance with *Policy NBE9*. We advise that you make clear use of [Natural England's latest guidance on achieving nutrient neutrality](#) for new housing development (January 2024). This guidance has been published alongside an updated nutrient calculator. Please see further information in later chapters and our HRA comments regarding nutrient neutrality.

**Nutrient budgets and assessment, and any nutrient mitigation proposals must be agreed**



with Natural England and securable in perpetuity.

- **HDN1 – Land at Woodcroft Farm (164 dwellings)**
- **HDN2 – Land south of Five Heads Road (118 dwellings)**
- **HDN3 – Land north of Chalk Hill Road (38 dwellings)**
- **CFD1 – Land at Clanfield Country Farm (100 dwellings)**
- **CFD2 – Land at Drift Road (80 dwellings)**
- **FMS1 – Land west of Lymington Barn (90 dwellings)**
- **FMS4 – Land south of Winchester Road (100 dwellings)**
- **RLC1 – Land at Deerleap (north) (5 dwellings)**
- **RLC2 – Land at Deerleap (south) (8 dwellings)**
- **RLC 3 – Land at Oaklands House (51 dwellings)**
- **RLC4 – Land at Little Leigh Farm (81 dwellings)**
- **CTN1 – Land at Parsonage Farm (6 dwellings)**
- **CTN2 – Land at the Dairy (7 dwellings)**
- **LOV1 – Land rear of 191-211 Lovedean Lane (30 dwellings)**

### **River Itchen SAC**

Natural England recognise that a large proportion site *FMS1* and a smaller proportion of site *FMS4* fall within the river Itchen catchment which drains to the Solent designated sites, and therefore these developments will need to address nutrient neutrality. With regards to eutrophication, phosphorus is currently a limiting factor within the River Itchen SAC and should be given due consideration.

We advise that you make clear use of [Natural England's latest guidance on achieving nutrient neutrality](#) for new housing development (January 2024). This guidance has been published alongside an updated nutrient calculator. Please see further information is recent chapters regarding nutrient neutrality.

It is understood that developments in this area may be served by Alton Wastewater Treatment Works which discharges outside of the Solent catchment, or by privately owned Package Treatment Works (PTPs) discharging to the ground. **Natural England advise that nutrient neutrality will need to be considered for these allocations. Any nutrient budgets and assessments, and any nutrient mitigation proposals must be agreed with Natural England and securable in perpetuity.**

- **FMS1 – Land west of Lymington Barn (90 dwellings)**
- **FMS4 – Land south of Winchester Road (100 dwellings)**

**Natural England advise that the Plan will need to demonstrate that it has appropriately considered nutrient neutrality across these impacting site allocations upon the Solent designated sites and the River Itchen SAC.**

### Surface water drainage

**Please note that all allocations proposed in the Solent catchment area or crossing the River Itchen catchment area are likely to need to consider nutrient neutrality from surface water drainage.**

It is advised that best practice SuDS should be designed and installed in accordance with the requirements in the CIRIA SuDS Manual (C753). Please refer to our later advice in this letter on surface water drainage for more information on relevant guidance.

### **Landscape – South Downs National Park**

The following sites fall within close enough proximity to the boundary of the South Downs National

Park that they could have potential negative impacts to its landscape features and special qualities and must therefore consider *Policy NBE10*. We advise that you seek the views of the landscape advisor/ planner for the National Park for their knowledge of these sites and the wider setting, together with the aims and objectives of the park's management plan and how this can be considered through the Local Plan.

Natural England advise that the Council need to undertake a landscape assessment/ landscape and visual impact assessment (LVIA) to demonstrate that these site allocations are deliverable in their current locations. The Plan correctly identifies that landscape impacts should be considered across these allocations, yet it does not conclude that the Council has conducted its own assessments to justify the sites. Given the scale of some of these developments and the varied topography across the Local Plan Area, Natural England recommend that a landscape assessment to underpin this Plan is necessary. We would expect appropriate consideration through the Plan to further the purposes of the National Park's protected landscape features, characteristics and special qualities.

- **ALT8 – Land at Neatham Manor Farm, Alton** (1000 dwellings including 6 travelling Showpeople plots)
- **HDN1 – Land at Woodcroft Farm** (164 dwellings)
- **HDN2 – Land south of Five Heads Road** (118 dwellings)
- **HDN3 – Land north of Chalk Hill Road** (38 dwellings)
- **LIP1 – Land north of Haslemere Road** (24 dwellings)
- **LIP2 – Land west of Headley Road** (20 dwellings)
- **LIP3 – Land at Chitley Farm** (67 dwellings)
- **CFD1 – Land at Clanfield Country Farm** (100 dwellings)
- **CFD2 – Land at Drift Road** (80 dwellings)
- **RLC1 – Land at Deerleap (north)** (5 dwellings)
- **RLC2 – Land at Deerleap (south)** (8 dwellings)
- **RLC 3 – Land at Oaklands House** (51 dwellings)
- **RLC4 – Land at Little Leigh Farm** (81 dwellings)
- **HED1 – Land at Middle Common** (6 Travelling Showpeople plots)
- **CTN1 – Land at Parsonage Farm** (6 dwellings)
- **CTN2 – Land at the Dairy** (7 dwellings)
- **LOV1 – Land rear of 191-211 Lovedean Lane** (30 dwellings)

Please make note of Annex 3 of this letter whereby [Section 245](#) (Protected Landscapes) of the Levelling Up and Regeneration Act 2023 places a duty on relevant authorities in exercising or performing any functions in relation to, or so as to affect, land in a National Park, the Broads or an Area of Outstanding Natural Beauty (“National Landscape”) in England, to seek to further the statutory purposes of the area.

#### Bechstein's Bats

Natural England recognise that the Plan refers to Bechstein's Bats as a consideration for the allocations proposed in the Rowlands Castle area, listed below. The Bechstein's Bat population in and around Havant Borough is assumed to be functionally linked to larger populations in West Sussex and therefore to the Singleton & Cocking Tunnels Special Area of Conservation (SAC). The SAC is designated due to winter populations of Bechstein's and Barbastelle bats. Evidence from bat tracking studies has shown that another bat species from the SAC has travelled to Havant borough and therefore a functional link between the SAC and the Bechstein's Bat populations in this part of the borough is highly likely. Natural England recognise that Bechstein's Bats have been considered in previous allocations in Waterlooville with appropriate mitigation and enhancement plans being implemented. Given this assumed linkage, it will be necessary for the HRA to include details of any likely significant effect on the Singleton & Cocking Tunnels SAC.

- **RLC1 – Land at Deerleap (north)** (5 dwellings)
- **RLC2 – Land at Deerleap (south)** (8 dwellings)
- **RLC 3 – Land at Oaklands House** (51 dwellings)

- **RLC4 – Land at Little Leigh Farm (81 dwellings)**

Ancient woodland, ancient and veteran trees

It is understood that the following allocation sites are proposed directly adjacent to areas classified as Ancient Replanted Woodland and/or Ancient & Semi-Natural Woodland.

The local planning authority should consider any impacts on ancient woodland and ancient and veteran trees in line with paragraph 186 of the NPPF. Natural England maintains the Ancient Woodland [Inventory](#) which can help identify ancient woodland. Natural England and the Forestry Commission have produced [standing advice](#) for planning authorities in relation to ancient woodland and ancient and veteran trees. Please refer to our standard advice and further guidance discussed later in this letter.

- **ALT1 – Land at Brick Kiln Lane, Alton (100 dwellings)**
- **ALT4 – Land at Whitedown Lane, Alton (90 dwellings)**
- **ALT8 – Land at Neatham Manor Farm, Alton (1000 dwellings including 6 travelling Showpeople plots)**

**Comments on the draft East Hampshire Local Plan 2040 – Reg 18**

***Local Plan Vision***

Natural England welcome the fact that the climate emergency will be a key concern and focus for new Local Plan and that development coming forward will need to be net zero carbon and sustainable. We advise that the climate emergency sits at the heart of the new Local Plan, with clear recognition as the key issue and priority to positively respond to. The Plan should have a clear aim to significantly and demonstrably improve the natural environment to ensure housing and infrastructure needs are met sustainably.

Natural England advises that the Plan’s vision and emerging development strategy should address impacts on and opportunities for the natural environment and set out the environmental ambition for the plan area. The plan should take a strategic approach to the protection and enhancement of the natural environment, including providing a net gain for biodiversity, considering opportunities to enhance and improve connectivity.

The Plan is underpinned by the core Objectives A1-3, B1-5 and C1-4. We advise that more clarity could be made through Objectives B1-5 and C3 in securing measurable net gains for biodiversity, while closely linking to the Biodiversity Action Plan, Local Nature Partnership, South Downs National Park Management Plans, Rights of Way Improvement Plans and Green Infrastructure Strategies and the Nature Recovery Network, for how this can positively achieve gains in biodiversity alongside improving overall environmental connectivity. Natural England advise that greater emphasis through the Plan Vision and Objectives should be made to facilitating wider ecological connectivity through the Local Nature Recovery Strategy (LNRS). Consideration should be given to how this can improve the Plan’s visibility of its ecological network through enhanced mapping.

***Local Plan Policies***

- ***Policy CLIM1, CLIM2, CLIM3, CLIM4 & CLIM5 – Responding to the Climate Emergency***

Natural England welcome these five key policies in tackling and facing climate change. A proactive approach to mitigating and adapting to climate change should be promoted through various methods, for example through sustainable forms of transport, promoting alternative means of travel, the integration of green and blue infrastructure into the design of developments, the incorporation of energy efficient, renewable and low carbon technologies into all new development, reducing reliance on car travel, avoiding/ reducing risk of flooding, and prioritising higher water efficiency standards.

Climate change is already impacting on nature and society in England and across the world. The projected scale and rate of climate change, coupled with existing environmental pressures, has serious implications for the natural environment and the services it provides to society. In response, many local authorities across England are formally declaring a climate change emergency and are now looking for practical steps to address it. The faster that greenhouse gas emissions can be reduced, the more the overall pressure on the natural environment will be reduced.

'Nature-based solutions' and natural capital are essential to achieve this. These involve the restoration of ecosystems for the long-term benefit of people and nature. Examples include:

- Expansion of tree and woodland cover – to strengthen woodland habitat networks, protect soils, provide shade whilst capturing additional carbon from the atmosphere.
- Restoration and creation of [priority habitats](#) such as lowland meadows, lowland fens and rush pastures. This improves places where people live and recreate, protecting carbon stores and strengthening the nature recovery network.
- Natural floodplain management, through the use of tree planting, habitat creation and restoration, to alleviate flooding further downstream.
- Retrofitting of green and blue infrastructure such as trees and sustainable urban drainage systems (SUDS) in urban localities to address flood risk and heat island effects.

We recommend the Plan ensures the following:

1. Set an ambitious climate-specific target within the Policy for reducing greenhouse gas emissions that can be monitored over the Plan period, in line with the national commitment to achieving the national statutory target of net zero emissions by 2050.
2. Identify opportunities to increase tree and woodland cover consistent with the UK target. Wherever possible, this should provide multi-functional benefits. Planting on peatlands and other open priority habitats must be avoided.
3. Identify areas where nature-based solutions can provide benefits to people whilst reducing climate change vulnerability in the natural environment.
4. Identify habitats and protected sites that are particularly vulnerable to the impacts of climate change and consider how the Plan can reduce these vulnerabilities.

We advise that these actions are integrated into a strategic approach alongside green infrastructure, health and wellbeing, biodiversity net gain, natural flood management, air and water quality to deliver multifunctional benefits to people and wildlife. The Plan should make clear that development will be consistent with these policies, to ensure sustainable development is properly achieved across the Plan period. Meaningful targets should be set that can be appropriately monitored over the Plan period to demonstrate the effectiveness of the Plan/Policy in addressing climate change and to ensure appropriate remedial action can be taken as necessary.

Natural England has published a range of resources to help with the recommended actions; please see links listed under **Annex 2** of this letter. Natural England would be happy to advise further on this aspect of the Local Plan development.

- ***Policy NBE2 – Biodiversity, Geodiversity and Nature Conservation***

#### ***Advice on wider environmental gains***

Natural England focusses our advice on embedding biodiversity net gain in development plans, since the approach is better developed than for wider environmental gains. However, your authority should consider the requirements of the NPPF (paragraph 180, 185 and 186) and seek

opportunities for wider environmental net gain wherever possible. This can be achieved by considering how policies and proposed allocations can contribute to wider environment enhancement, help adapt to the impacts of climate change and/or take forward elements of existing green infrastructure, open space and biodiversity strategies. Opportunities for environmental gains, including nature based solutions to help adapt to climate change, might include:

- Identifying opportunities for new multi-functional green and blue infrastructure.
- Managing existing and new public spaces to be more wildlife friendly (e.g. by sowing wild flower strips) and climate resilient.
- Planting trees, including street trees, characteristic to the local area to make a positive contribution to the local landscape.
- Improving access and links to existing greenspace, identifying improvements to the existing public right of way network or extending the network to create missing footpath or cycleway links.
- Restoring neglected environmental features (e.g. a hedgerow or stone wall or clearing away an eyesore).
- Designing a scheme to encourage wildlife, for example by ensuring lighting does not pollute areas of open space or existing habitats.

Any habitat creation and/or enhancement as a result of the above may also deliver a measurable biodiversity net gain.

- ***Policy NBE3 – Biodiversity Net Gain***

Natural England note this stand-alone policy for Biodiversity Net Gain (BNG) whereby development must show how a measurable BNG of at least 10% will be delivered in line with the requirements under the Environment Act 2021. We would welcome investigating more ambitious BNG targets that could go beyond existing requirements.

For biodiversity net gain, the [statutory metric](#) can be used to measure gains and losses to biodiversity resulting from development. Natural England recognised that this has been incorporated into the policy, with clear reference to adhere to the latest version of the BNG guidance and Metric as this may change over time.

Natural England are pleased to see reference through this policy for the requirement of development proposals to submit a costed 30-year management and maintenance plan detailing how the BNG values will be kept and achieved over the full time period. We advise that the council have appropriate measures and practices in place for agreeing BNG assessments, recording and monitoring any on-site or off-site BNG, and any strategic sites whereby BNG credits will be sold.

Please refer to Natural England's further advice on embedding Biodiversity Net Gain in your Plan and the further information achieving net gains in Annex 1 of this letter. Please also see Annex 4 for a list of Local Plan evidence sources.

- ***Policy NBE4 – Wealden Heaths European SPA and SAC Sites***

Natural England are satisfied to see that this policy is in place to protect the European sites in which make up the Wealden Heaths Special Protection Area (SPA) and its supporting Special Areas of Conservation (SAC). However, it is understood that this policy only extends to the Wealden Heaths Phase II SPA, Woolmer Forest SAC and Shortheath Common SAC sites, given these are the sites that fall within the East Hampshire Local Plan Area.

**Natural England advise that a joint strategic approach should be implemented in policy that extends across the entire Wealden Heaths SPA and SAC complex, including the Wealden Heaths Phase I SPA and SAC sites.** Without this, the Plan does not make clear how additional development via windfall sites will mitigate for impacts on the Wealden Heaths Phase I sites. We continue to inform that a strategy for dealing with Wealden Heaths Phase I and Phase II sites

should be consistent, and we welcome the opportunity to work further with the Council on this. Please find below our additional comments to *Policy NBE4*.

Natural England are supportive of this policy to incorporate a wider Strategic Access Management and Monitoring (SAMM) mitigation strategy for all net new residential development within 400m to 5km of the Wealden Heaths SPA and SAC site boundaries. *Policy NBE4* states that SAMM contributions will be required for all net new residential development. Natural England looks forward to reviewing the proposed mitigation strategy in detail through the emerging Local Plan and HRA process to advise on the appropriate approach for this Plan and policies in due course. Where bespoke mitigation may be necessary, we are pleased to have inclusion of our Discretionary Advice Service (DAS) for bespoke mitigation advice, such as with SANGs or other mitigation proposals, and we advise that our SANG Guidelines (Aug 2021) are referred to.

Natural England recognise that the Council is producing further work on this which could shape *Policy NBE4* as this draft Local Plan progresses. We understand that the SAMM mitigation strategy is being investigated alongside the inclusions of [Wealden] Heaths Infrastructure Projects [W]HIPS to see what may be most suitable and appropriate to underpin this Plan's housing delivery within 5km of the Wealden Heaths European sites. This is discussed further within the *Habitats Regulations Assessment – Regulation 18 (January 2024)*.

Natural England welcome the opportunity to continue working closely with the Council as this mitigation strategy develops through the Local Plan process. We acknowledge that *Policy NBE4* requires refinement and will be shaped by the mitigation strategy that is later adopted.

- ***Policy NBE5 – Thames Basin Heaths SPA***

Natural England concur with the details within *Policy NBE5*. It is understood that part of the Thames Basin Heaths 5km buffer zone covers the northwest of the Local Plan Area and as such, any development proposing a net gain in residential development must be assessed on a case-by-case basis for details or requirements of any avoidance and/or mitigation measures. This should be done in agreement with Natural England.

The policy correctly states that the wider Thames Basin Heaths 5 – 7km buffer also impacts on the Local Plan Area. We agree that mitigation will be assessed on a case-by-case basis for large scale residential developments of 50+ net gain in dwellings only. Bespoke mitigation may be necessary in this wider Thames Basin Heaths catchment, and Natural England advice and guidance should be sought.

- ***Policy NBE6 – Solent Special Protection Areas***

Natural England welcome *Policy NBE6* that will require new residential development to address in-combination effects on the Solent SPAs via increased recreational disturbance. It is recommended the Policy also outlines the other types of development (such as new hotels, student accommodation, care homes etc.) that may also need to address recreational disturbance impacts, both alone and in-combination. Such development should be assessed on a case-by-case basis.

- ***Policy NBE7 – Managing Flood Risk***

Natural England welcome this Policy that requires development ensures flood and surface drainage are properly addressed, and that Sustainable Drainage Systems (SuDS) are designed in accordance with CIRIA C753 SuDs Manual, to be as 'natural' as possible.

It is advised that the policy makes clear that where a development drains to a protected site(s), an additional treatment component (i.e. over and above that required for standard discharges), or other equivalent protection may be required to ensure water quality impacts are avoided.

Where SuDS are proposed serving as mitigation for protected sites, development should ensure

that appropriate resources are put in place to ensure their long-term (in perpetuity) monitoring, maintenance/replacement, and funding.

- ***Policy NBE8 – Water Quality, Supply and Efficiency***

Southern Water's Water Resources Management Plan (WRMP) 2019, that covers the planning period 2020-2070, projects a significant supply demand deficit during periods of drought in the Western Area, and commits to implementing a long-term water resources scheme to restore the supply demand balance whilst avoiding and/or mitigating impacts on European sites, including the River Itchen Special Area of Conservation (SAC).

It is Natural England's advice that in advance of any permitting of such a suitable long-term scheme, uncertainty remains with regards to water resources and the impacts of abstraction on protected sites.

It is welcomed that *Policy NBE8* requires a water consumption for new dwellings of no more than 95 litres per person per day, including external water use and re-use, which is in line with Southern Water's Target 100 demand reduction programme which is committed to within their WRMP19. Natural England also recommends that the Policy encourages the re-use of water in conjunction with the water companies, for example by promoting the implementation of grey water recycling systems and more efficient water appliances in new development and raising awareness of responsible water use.

- ***Policy NBE9 – Water Quality Impact on the Solent International Sites***

Natural England welcome this policy that will require new development that propose a net increase in overnight accommodation to address in-combination effects on the Solent designated sites via eutrophication from nutrients in wastewater.

It is understood that the Council is working in collaboration with partner authorities including the Partnership for South Hampshire (PfSH) to work towards a definitive mitigation strategy to achieve nutrient neutrality. It would be advised to take an approach to seeking to allocate land through the local plan process to strategically address the impact of nutrients from new development on the River Itchen SAC and Solent marine designated sites, which are currently showing high levels of nutrients with consequential effects on protected species and habitats.

The Plan comprises new housing development and has inevitable wastewater implications. It is Natural England's view that these implications, and all other matters capable of having a significant effect on designated sites in the Solent, must be addressed in the ways required by Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended). Natural England strongly recommends that the Council includes a nutrient management plan or similar strategy to offset the delivery of increased nutrients from Local Plan development and to achieve nutrient neutrality. We recommend that the Local Plan includes a policy to support this strategy. Natural England has written advice on calculating nutrient budgets and the potential mitigation solutions and will continue to work with East Hampshire District Council and all affected local planning authorities to help address this issue.

With regards to eutrophication, phosphorus is currently a limiting factor within the River Itchen SAC. The local plan should seek to preserve water quality on the Itchen and ensure that local plan and windfall development within the district will not increase the phosphorus loading on the SAC from wastewater and surface run off.

Please note that the term 'nutrient' or 'nitrogen' should be used when discussing eutrophication of the marine Solent designated sites ('nitrates' specifically is a component of total nitrogen). When discussing eutrophication of riverine systems, 'phosphorus' should be the term used rather than 'phosphates'.

Please make clear use of [Natural England's latest guidance on achieving nutrient neutrality](#) for new housing development (January 2024). This guidance has been published alongside an updated nutrient calculator to help deliver homes that do not discharge excess nitrogen into the Solent's protected natural habitats, while considering that some wastewater treatment works may be due an upgrade by/ after 2030 in line with PR24 upgrades or the Levelling Up and Regeneration Act (LURA) Technically Achievable Limit (TAL) upgrades if designated as a sensitive catchment.

Please also make appropriate use of our latest [tools and resources for calculating nutrient neutrality](#) (February 2024).

- ***Policy NBE10 – Landscape***

Natural England expects the Local Plan to include strategic policies to protect and enhance valued landscapes, as well criteria-based policies to guide development. It is welcomed that the Council has carried out further work to support their *Landscape Capacity Study 2022*, recognising the value of the designated landscapes across and adjacent to the district, such as the South Downs National Park (SDNP) and the Surrey Hills National Landscape/ Area of Outstanding Natural Beauty (AONB) respectively. Natural England advise that the use of the Landscape Capacity Study and any further assessment by the Council should be demonstrated through the Plan in how it has led to justifying that there is suitable landscape capacity for each of the Reg.18 Local Plan Site Allocations.

It is well received that the emerging Plan will prioritise existing landscape features in decision making via *Policy NBE10*, ensuring any allocations will need to be designed and located sensitively to continue to protect and enhance these high-value and high-quality landscapes, most notably the South Downs National Park. The Plan and emerging Policy should be guided by NPPF paragraphs 180, 182 and 183, in protecting and enhancing valued landscapes; conserving the scenic beauty of AONB/ National Landscape settings of which have the highest value; of which AONBs/ National Landscapes and National Parks are given the highest status of protection for their landscape and scenic beauty.

Natural England expect a further landscape assessment under this draft Local Plan to demonstrate the appropriateness of the proposed site allocations.

Please make note of further information and guidance in Annex 1 and Annex 3 of this letter.

- ***Policy NBE12 – Green and Blue Infrastructure***

Green infrastructure refers to the living network of green spaces, water and other environmental features in both urban and rural areas. It is often used in an urban context to provide multiple benefits including space for recreation, access to nature, flood storage and urban cooling to support climate change mitigation, food production, wildlife habitats and health & well-being improvements provided by trees, rights of way, parks, gardens, road verges, allotments, cemeteries, woodlands, rivers and wetlands.

Green infrastructure is also relevant in a rural context, where it might additionally refer to the use of farmland, woodland, wetlands or other natural features to provide services such as flood protection, carbon storage or water purification.

We welcome the amendments which have been made to the draft Green Infrastructure policy we reviewed in October 2023, during the last Reg 18 consultation. It is acknowledged that our advice has been taken onboard in the shaping of draft *Policy NBE12 – Green and Blue Infrastructure*. We set out below some points of clarification and areas which can be expanded further.

We welcome the inclusion of the GI Framework Urban Greening Factor Standard within the policy requirement; however, we suggest that this is removed from point a. and identified as a separate point so additional brief information can be provided, for example, as follows (*example text only*):  
b. it meets or exceeds the recommended minimum Urban Greening Factor (UGF) target score for



major developments of 0.3 for predominantly non-residential development and 0.4 for predominantly residential development. UGF should be calculated using the Natural England Green Infrastructure Framework Urban Greening Factor for England User Guide and spreadsheet (note for EHDC – this could be referred to on the GI Framework website [Green Infrastructure Home \(naturalengland.org.uk\)](https://www.naturalengland.org.uk) or [GI Downloads \(naturalengland.org.uk\)](https://www.naturalengland.org.uk), or incorporated into the local plan as an appendix).

Natural England welcome the inclusion of reference to other quality standards in the supporting 'Implementing the Policy' text. However, for clarity we recommend the first sentence of *paragraph 5.91* should be rephrased to state that developments should contribute to the aims of the EHDC Green Infrastructure Strategy and Natural England's 15 GI Principles and applications will be favourably received where they have utilised and achieved accreditation from nationally recognised green infrastructure quality standards such as Building with Nature.

We would also recommend combing the opportunities and deficits identified in all these documents into one document/map to support and inform work on Biodiversity Net Gain, Local Nature Recovery Strategy, nutrient neutrality and Suitable Alternative Natural Greenspace (SANG) provision, and to support initiatives such as Green Social Prescribing, in conjunction with the neighbouring local authorities, Hampshire County Council and the Local Nature Partnership. This would assist in creating an overarching strategy to maximise all the multi-function benefits of nature and could identify opportunities for green financing.

**Natural England recommend that further emphasis is placed on how the GI Strategy under this draft Plan links to the Local Nature Recovery Strategy, as stated in *paragraph 5.88*.**

As advised again below under *Policy DM1 – The Local Ecological Network*, the Plan should make clear that development proposals should demonstrate how they have considered the ecological network across the East Hampshire area (as shown on Appendix A – Map of Habitats sites and Policies Map) and are required to align with the Local Nature Recovery Strategy (LNRS).

- ***Policy DM1 – The Local Ecological Network***

Natural England recognise that reference to Local Nature Recovery Strategies (LNRSs) is made in paragraph 11.2. However, **Natural England recommend that further emphasis is placed on how the local ecological network policy and any associated mapping will link to the Local Nature Recovery Strategy.**

Under this policy, the Plan should make clear that development proposals should demonstrate how they have considered the ecological network across the East Hampshire area (as shown on Appendix A – Map of Habitats sites and Policies Map) and are required to align with the Local Nature Recovery Strategy (LNRS).

Work is underway within Natural England and with partners on several of the key elements of the Environment Act, including Nature Recovery Networks and Local Nature Recovery Strategies. It should be noted that the term Nature Recovery Network (NRN) is used to refer to a single, growing national network of improved joined-up, wildlife rich places which will benefit people and wildlife. Local Nature Recovery Strategies (LNRSs) will be the key mechanism for planning and mapping local delivery of the NRN. LNRSs will form a new system of spatial strategies for nature that will be mandated by the Environment Act. They will cover the whole of England and will be developed here by Responsible Authorities (RAs) appointed by the Secretary of State, usually at the county scale. The strategy will:

- Map the most valuable existing habitat for nature.
- Map specific proposals for creating or improving habitat for nature and wider environment goals.
- Agree priorities for nature's recovery.

It is the government's intention that biodiversity net gain will provide a financial incentive for

development to support the delivery of LNRSs through an uplift in the calculation of biodiversity units created at sites identified by the strategy. LNRSs can also help local planning authorities deliver strong policy on conserving and enhancing biodiversity. It is recommended that the Local Plan policy recognises and references its support to the delivery of the emerging NRN and LNRS covering the area.

- ***Policy DM13 – Air Quality***

Natural England note that Policy DM13 does not recognise air quality in reference to ecological receptors, namely European sites. It is understood that Likely Significant Effects from this Reg.18 Local Plan have been concluded on a list of European sites in the Local Plan Area from atmospheric pollution. Natural England expect the plan to appropriately address the impacts of air quality on the natural environment.

- ***Policy DM18 – Residential Extensions and Annexes***

Natural England advise that certain extensions or annexes may be subject to mitigation requirements depending on their scale, design and planning restrictions, or conditions. These will be assessed on a case-by-case basis to whether they constitute an annexe or a new +1 residential dwelling towards any mitigation requirement for increased recreational pressure. This is subject to the development site falling within a known zone of influence to a sensitive SPA or SAC.

- ***Policy DM19 – Conversion of an Existing Agricultural or Other Rural Building to Residential Use & Policy 20 – Rural Worker Dwellings***

Natural England advise that this policy makes reference to, where relevant, the importance of having note of the South Downs National Park management plan for assessing these development proposals or seeking the valued opinion of the landscape advisor/ planner for the National Park. It is our experience that many of these developments are proposed to come forward within a protected landscape and could have an impact on its setting. Reference to this would be recommended.

## **Comments on the Integrated Impact Assessment Scoping Report – Reg 18**

### ***Baseline information***

Natural England is content with the information provided to demonstrate the sustainability baseline for the Integrated Impact Assessment (IIA).

We note and welcome that the East Hampshire District Council Habitats Regulations Assessment (HRA) is referred to for determining various ways land use plans can affect internationally designated sites through potential impact pathways. It is clear that the HRA will be carried out alongside the Sustainability Appraisal. We advise that this should be an iterative process where the findings of the HRA are fed into the assessment of sustainability.

### ***Summary of Key Issues & Objectives***

Natural England is content with the summary of key issues and objectives through this assessment. We would refer you back to our previous advice submitted to the Council on 18 September 2023 on the IIA Scoping Report for any further comment.

We welcome the key focus placed around Biodiversity and the Climate Emergency as fundamental topics underpinning the IIA Scoping Report, its key issues and key objectives.

We would be pleased to advise on this further should any changes and updates be made to the Integrated Impact Assessment report.

Please see our further advice on aspects such as water quality, air pollution, protected landscapes and climate change adaptation under Annex 1, 2 and 3 below. We look forward to further collaboration with the Council as this Plan progresses.

We would be very happy to comment further as the plan process progresses. If you have any queries relating to this letter please contact me on [REDACTED] [@naturalengland.org.uk](mailto:[REDACTED]@naturalengland.org.uk).

Yours faithfully

[REDACTED]  
**Lead Advisor Sustainable Development**  
**Thames Solent Team**  
**Natural England**

## Annex 1 - Natural England's standard advice

### Sites of Least Environmental Value

In accordance with the paragraph 181 of NPPF, the plan should allocate land with the least environmental or amenity value. Natural England expects sufficient evidence to be provided, through the SA and HRA, to justify the site selection process and to ensure sites of least environmental value are selected, e.g., land allocations should avoid designated sites and landscapes and significant areas of best and most versatile agricultural land and should consider the direct and indirect effects of development, including on land outside designated boundaries and within the setting of protected landscapes.

### Biodiversity and Geodiversity

The Plan should set out a strategic approach, planning positively for the creation, protection, enhancement and management of networks of biodiversity. There should be consideration of geodiversity conservation in terms of any geological sites and features in the wider environment.

A strategic approach for networks of biodiversity should support a similar approach for green infrastructure (outlined below). Planning policies and decisions should contribute and enhance the natural and local environment, as outlined in para 180 of the NPPF. Plans should set out the approach to delivering net gains for biodiversity. Net gain for biodiversity should be considered for all aspects of the plan and development types, including transport proposals, housing and community infrastructure.

### Health and Wellbeing (GI)

There is increasing recognition of the importance of nature and place as a determinant of individuals' mental and physical health. Existing evidence<sup>2</sup> shows that access to natural green spaces can help reduce stress, fatigue, anxiety and depression, and boost immune systems and encourage physical activity. The risk of chronic diseases such as asthma may also be reduced.

The [Defra 25 Year Plan](#) outlines nature-based actions that can be taken to help people connect to the natural environment to improve health and wellbeing. Such actions can include 'greening' our towns and cities, planting urban trees, encouraging children to access nature in and out of school and improving access for all in local green spaces.

It is estimated that the provision of parks and greenspaces across Britain saves the NHS at least £110 million a year solely through reduced visits to GPs<sup>3</sup>, and their improved availability can help reduce health inequalities across society<sup>4</sup>.

The provision of enhanced green infrastructure and sites of nature conservation value can not only help address some of the mental and physical health problems experienced in the population but can also benefit society in other ways including improvements to local air and water quality, reducing the risk of flooding, alleviating noise levels and aiding climate change adaptation.

Natural England recommend the local plan Vision sets out policy that links public health and wellbeing to the natural environment and seeks to enhance green infrastructure and ecological connectivity across the district that is managed for people and nature. Please see relevant advice in this letter relating to green infrastructure, protection of natural assets and achieving biodiversity net gain to help maximise the benefits outlined in this section.

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<sup>2</sup> [\[1\] Evidence Statement on the links between natural environments and human health](#), University of Exeter and Defra, 2017; [Urban Green Spaces and Health](#), World Health Organisation Regional Office for Europe, 2016, 9-10.

<sup>3</sup> [\[2\] Revaluing Parks and Green Spaces Measuring their economic and wellbeing value to individuals](#), Fields In Trust, 2018

<sup>4</sup> [\[3\] Marmot, M. Fair society, healthy lives : the Marmot Review : strategic review of health inequalities in England post-2010. \(2010\) ISBN 9780956487001](#)

## **Priority habitats, ecological networks and priority and/or legally protected species populations**

The Local Plan should be underpinned by up-to-date environmental evidence. This should include an assessment of existing and potential components of local ecological networks. This assessment should inform the Sustainability Appraisal, ensure that land of least environment value is chosen for development, and that the mitigation hierarchy is followed and inform opportunities for enhancement as well as development requirements for particular sites.

Priority habitats and species are those listed under Section 41 of the Natural Environment and Rural Communities Act, 2006 and UK Biodiversity Action Plan (UK BAP). Further information is available here: [Habitats and species of principal importance in England](#). Local Biodiversity Action Plans (LBAPs) identify the local action needed to deliver UK targets for habitats and species. They also identify targets for other habitats and species of local importance and can provide a useful blueprint for biodiversity enhancement in any particular area.

Protected species are those species protected under domestic or European law. Further information can be found here [Standing advice for protected species](#). Sites containing watercourses, old buildings, significant hedgerows and substantial trees are possible habitats for protected species.

Ecological networks are coherent systems of natural habitats organised across whole landscapes so as to maintain ecological functions. A key principle is to maintain connectivity - to enable free movement and dispersal of wildlife e.g., badger routes, river corridors for the migration of fish and staging posts for migratory birds. Local ecological networks will form a key part of the wider Nature Recovery Network proposed in the 25 Year Environment Plan. Where development is proposed, opportunities should be explored to contribute to the enhancement of ecological networks.

Planning positively for ecological networks will also contribute towards a strategic approach for the creation, protection, enhancement and management of green infrastructure, as identified in paragraph 181 of the NPPF.

### **Access and Rights of Way**

Natural England advises that the Plan should include policies to ensure protection and enhancement of public rights of way and National Trails, as outlined in paragraph 104 of the NPPF. Recognition should be given to the value of rights of way and access to the natural environment in relation to health and wellbeing and links to the wider green infrastructure network. The plan should seek to link existing rights of way where possible and provides for new access opportunities. The plan should avoid building on open space of public value as outlined in paragraph 103 of the NPPF. The plan should make provision for appropriate quantity and quality of green space to meet identified local needs as outlined in paragraph 102 of the NPPF.

### **Soils**

The Local Plan should give appropriate weight to the roles performed by the area's soils. These should be valued as a finite multi-functional resource which underpins our wellbeing and prosperity. Decisions about development should take full account of the impact on soils, their intrinsic character and the sustainability of the many ecosystem services they deliver for example:

1. Soil is a finite resource that fulfils many important functions and services (ecosystem services) for society, for instance as a growing medium for food, timber and other crops, as a store for carbon and water, as a reservoir of biodiversity and as a buffer against pollution. It is therefore important that the soil resources are protected and used sustainably. The [Natural Environment White Paper](#) (NEWP) 'The Natural Choice: securing the value of nature' (Defra, June 2011), emphasises the importance of natural resource protection, including the conservation and sustainable management of soils, for example:
  - A Vision for Nature: 'We must protect the essentials of life: our air, biodiversity, soils and water, so that they can continue to provide us with the services on which we rely' (paragraph 2.5).

- Safeguarding our Soils: ‘Soil is essential for achieving a range of important ecosystem services and functions, including food production, carbon storage and climate regulation, water filtration, flood management and support for biodiversity and wildlife’ (paragraph 2.60).
  - ‘Protect ‘best and most versatile’ agricultural land’ (paragraph 2.35).
2. The conservation and sustainable management of soils also is reflected in the [National Planning Policy Framework](#) (NPPF), particularly in paragraph 180. When planning authorities are considering land use change, the permanency of the impact on soils is an important consideration. Particular care over planned changes to the most potentially productive soil is needed, for the ecosystem services it supports including its role in agriculture and food production. Plan policies should therefore take account of the impact on land and soil resources and the wide range of vital functions (ecosystem services) they provide in line with paragraph 180 of the NPPF, for example to:
    - Safeguard the long-term capability of best and most versatile agricultural land (Grades 1, 2 and 3a in the Agricultural Land Classification) as a resource for the future.
    - To avoid development that would disturb or damage other soils of high environmental value (e.g., wetland and other specific soils contributing to ecological connectivity, carbon stores such as peatlands etc) and, where development is proposed.
    - Ensure soil resources are conserved and managed in a sustainable way.
  3. To assist in understanding agricultural land quality within the plan area and to safeguard ‘best and most versatile’ agricultural land in line with paragraph 180 of the National Planning Policy Framework, strategic scale Agricultural Land Classification (ALC) Maps are available. Natural England also has an archive of more detailed ALC surveys for selected locations. Both these types of data can be supplied digitally free of charge by contacting Natural England. Some of this data is also available on the [www.magic.gov.uk](http://www.magic.gov.uk) website. The planning authority should ensure that sufficient site specific ALC survey data is available to inform decision making. For example, where no reliable information was available, it would be reasonable to expect that developers should commission a new ALC survey, for any sites they wished to put forward for consideration in the Local Plan.
  4. General mapped information on soil types is available as ‘Soilscapes’ on the [www.magic.gov.uk](http://www.magic.gov.uk) and also from the LandIS website <http://www.landis.org.uk/index.cfm> which contains more information about obtaining soil data.
  5. Further guidance for protecting soils (irrespective of their ALC grading) both during and following development is available in Defra’s [Construction Code of Practice for the Sustainable Use of Soils on Construction Sites](#), to assist the construction sector in the better protection of the soil resources with which they work, and in doing so minimise the risk of environmental harm such as excessive run-off and flooding. The aim is to achieve positive outcomes such as cost savings, successful landscaping and enhanced amenity whilst maintaining a healthy natural environment, and we would advise that the Code be referred to where relevant in the development plan.

The [25 Year Environment Plan](#) (25YEP) sets out government action to help the natural world regain and retain good health, including highlighting the need to:

- protect the best agricultural land.
- put a value on [natural capital](#), including healthy soil.
- ensure all soils are managed sustainably by 2030.
- restore and protect peatland.

The conservation and sustainable management of soils is reflected in paragraph 180(a), 180(b) and 181 footnote 62 of the [National Planning Policy Framework](#) (NPPF). These state that ‘Planning policies and decisions should contribute to and enhance the natural and local environment by; protecting and enhancing [...] soils (in a manner commensurate with their statutory status or

identified quality in the development plan); recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland; distinguishing between the hierarchy of international, national and locally designated sites to allocate land with the least environmental or amenity value, where consistent with other policies in this Framework.

Footnote [62](#) details that where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality. The availability of agricultural land used for food production should be considered, alongside the other policies in this Framework, when deciding what sites are most appropriate for development.

### **Air pollution**

We would expect the plan to address the impacts of air quality on the natural environment. In particular, it should address the traffic impacts associated with new development, particularly where this impacts on European sites and SSSIs. The environmental assessment of the plan (SA and HRA) should also consider any detrimental impacts on the natural environment and suggest appropriate avoidance or mitigation measures where applicable.

Natural England advises that one of the main issues which should be considered in the plan and the SA/HRA are proposals which are likely to generate additional nitrogen emissions as a result of increased traffic generation, which can be damaging to the natural environment.

The effects on local roads in the vicinity of any proposed development on nearby designated nature conservation sites (including increased traffic, construction of new roads, and upgrading of existing roads), and the impacts on vulnerable sites from air quality effects on the wider road network in the area (a greater distance away from the development) can be assessed using traffic projections and the 200m distance criterion followed by local Air Quality modelling where required. We consider that the designated sites at risk from local impacts are those within 200m of a road with increased traffic, which feature habitats that are vulnerable to nitrogen deposition/acidification. APIS provides a searchable database and information on pollutants and their impacts on habitats and species: <http://www.apis.ac.uk/>

It is advised that [Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations](#) is followed when assessing impacts on protected sites.

### **Biodiversity Net Gain**

#### *Embedding biodiversity net gain*

It is highly recommended that the Local Plan Update incorporates a policy for biodiversity net gain. Biodiversity net gain is a key tool to help nature's recovery and is also fundamental to health and wellbeing as well as creating attractive and sustainable places to live and work in. The NPPF highlights the role of policies and decision making to minimise impacts and provide net gains for biodiversity (para 180).

Planning Practice Guidance describes net gain as an 'approach to development that leaves the natural environment in a measurably better state than it was beforehand' and applies to both biodiversity net gain and wider environmental net gains. For biodiversity net gain, Natural England's [statutory metric](#), can be used to measure gains and losses to biodiversity resulting from development. We advise you to use this metric to implement development plan policies on biodiversity net gain. Any action, as a result of development, that creates or enhances habitat features can be measured using the metric and as a result count towards biodiversity net gain.

The Chartered Institute of Ecology and Environmental Management, along with partners, has developed '[good practice principles](#)' for biodiversity net gain, which can assist plan-making

authorities in gathering evidence and developing policy.

The following may also be useful considerations in developing plan policies:

- Use of a map within the plan. Mapping biodiversity assets and opportunity areas ensures compliance with national planning policy and helps to clearly demonstrate the relationship between development sites and opportunities for biodiversity net gain.
- Use of a biodiversity net gain target. Any target should be achievable, and evidence based and may be best placed in lower tier documents or a Supplementary Planning Document, or similar, to allow for regular updates in line with policy and legislation.
- Consideration should be given to thresholds for different development types, locations or scales of development proposals and the justification for this. Setting out the scope and scale of expected biodiversity net gains within Infrastructure Delivery Plans can help net gain to be factored into viability appraisals and land values. Natural England considers that all development, even small-scale proposals, can make a contribution to biodiversity. Your authority may wish to refer to Technical Note 2 of the [CIEEM guide](#) which provide useful advice on how to incorporate biodiversity net gain into small scale developments.
- Policy should set out how biodiversity net gain will be delivered and managed and the priorities for habitat creation or enhancement in different parts of the plan area. The plan policy should set out the approach to onsite and offsite delivery. Natural England advises that on-site provision should be preferred as it helps to provide gains close to where a loss may have taken place. Off-site contributions may, however, be required due to limitations on-site or where this best meets wider biodiversity objectives set in the development plan. Further detail could be set out in a supplementary planning document.
- The policy could also usefully link to any complementary strategies or objectives in the plan, such as green infrastructure and Local Nature Recovery Strategies.

### Wider environmental gains

Natural England focusses our advice on embedding biodiversity net gain in development plans, since the approach is better developed than for wider environmental gains. However, your authority should consider the requirements of the NPPF (paragraph 180, 185 and 186) and seek opportunities for wider environmental net gain wherever possible. This can be achieved by considering how policies and proposed allocations can contribute to wider environment enhancement, help adapt to the impacts of climate change and/or take forward elements of existing green infrastructure, open space or biodiversity strategies. Opportunities for environmental gains, including nature-based solutions to help adapt to climate change, might include:

- Identifying opportunities for new multi-functional green and blue infrastructure.
- Managing existing and new public spaces to be more wildlife friendly (e.g., by sowing wild flower strips, changing cutting regime of open spaces and road verges\*) and climate resilient
- Planting trees, including street trees, characteristic to the local area to make a positive contribution to the local landscape.
- Improving access and links to existing greenspace, identifying improvements to the existing public right of way network or extending the network to create missing footpath or cycleway links.
- Restoring neglected environmental features (e.g., a hedgerow or stone wall or clearing away an eyesore).
- Designing a scheme to encourage wildlife, for example by ensuring lighting does not pollute areas of open space or existing habitats

\*Please see this [paper](#) regarding cost-effective and low-maintenance management for species-rich grassland on road verges and the value it can contribute to biodiversity and ecosystem services



Any habitat creation and/or enhancement as a result of the above may also deliver a measurable biodiversity net gain.

### Evidence gathering

Existing environmental evidence can be gathered from various sources including online data sources like [MAGIC](#), the [Hampshire Biodiversity Information Centre](#) (HBIC), and strategies for green infrastructure, open space provision, landscape character, climate and ecosystem services and biodiversity opportunity mapping. We advise that reference is made to the **Hampshire Ecological Network Mapping** dataset – this comprises the Local Ecological Network mapping for Hampshire, prepared by HBIC. The network comprises statutory designations, non-statutory designated sites, ancient woodlands, and other non-designated priority habitat, and other ecological features such as undesignated water bodies. Usefully, the Hampshire network mapping also identifies areas where there is the greatest potential to enhance the network, referred to as the network opportunities layer, based on habitat suitability indices. This can be useful where deciding where to create or enhance habitat.

Biodiversity data can also be obtained from developments that were subject to Environmental Impact Assessment (EIA) Monitoring, the discharge of conditions or monitoring information from legal agreements with a biodiversity element. This can help establish a baseline to understand what assets exist and how they may relate to wider objectives in the plan area. Cross boundary environmental opportunities can also be considered by working with neighbouring authorities, local nature partnership and/or the local enterprise partnership. The relationship between environmental assets and key strategic growth areas may help to highlight potential opportunities that development could bring for the natural environment. The following may also be useful when considering biodiversity priorities in your plan area:

- What biodiversity currently exists, what is vulnerable or declining?
- How are existing assets connected, are there opportunities to fill gaps and improve connectivity?
- How does the above relate to neighbouring authority areas, can you work collaboratively to improve links between assets or take strategic approaches to address issues or opportunities?

### Applying the mitigation hierarchy

The plan's approach to biodiversity net gain should be compliant with the mitigation hierarchy, as outlined in paragraph 185 of the NPPF. The policy should ensure that biodiversity net gain is not applied to irreplaceable habitats and should also make clear that any mitigation and/or compensation requirements for European sites should be dealt with **separately** from biodiversity net gain provision.

Policies and decisions should first consider options to avoid adverse impacts on biodiversity from occurring. When avoidance is not possible impacts should be mitigated and finally, if there is no alternative, compensation provided for any remaining impacts. Biodiversity net gain should be additional to any habitat creation required to mitigate or compensate for impacts. It is also important to note that net gains can be delivered even if there are no losses through development.

The policy for net gain, or its supporting text, should highlight how losses and gains will be measured. The [statutory metric](#) can be used for this purpose as a fully tested metric that will ensure consistency across the plan-area, and we would encourage its use. Alternatively, your authority may choose to develop a bespoke metric, provided this is evidenced based.

The following may also be useful considerations in developing plan policies:

- Use of a map within the plan. Mapping biodiversity assets and opportunity areas ensures

compliance with national planning policy and also helps to clearly demonstrate the relationship between development sites and opportunities for biodiversity net gain.

- ***NB: The Hampshire Ecological Network Mapping dataset would be ideally placed to provide this evidence base.***
- Use of a biodiversity net gain target. Any target should be achievable, and evidence based and may be best placed in lower tier documents or a Supplementary Planning Document, to allow for regular updates in line with policy and legislation.
- Consideration should be given to thresholds for different development types, locations or scales of development proposals and the justification for this. Setting out the scope and scale of expected biodiversity net gains within Infrastructure Delivery Plans can help net gain to be factored into viability appraisals and land values. Natural England considers that all development, even small-scale proposals, can make a contribution to biodiversity. Your authority may wish to refer to Technical Note 2 of the CIEEM guide which provide useful advice on how to incorporate biodiversity net gain into small scale developments.
- Policy should set out how biodiversity net gain will be delivered and managed and the priorities for habitat creation or enhancement in different parts of the plan area. The plan policy should set out the approach to onsite and offsite delivery. Natural England advises that on-site provision should be preferred as it helps to provide gains close to where a loss may have taken place. Off-site contributions may, however, be required due to limitations on-site or where this best meets wider biodiversity objectives set in the development plan. Further detail could be set out in a supplementary planning document.
- The policy could also usefully link to any complementary strategies or objectives in the plan, such as green infrastructure.

### Monitoring

Your plan should include requirements to monitor biodiversity net gain. This should include indicators to demonstrate the amount and type of gain provided through development. The indicators should be as specific as possible to help build an evidence base to take forward for future reviews of the plan, for example the total number and type of biodiversity units created, the number of developments achieving biodiversity net gains and a record of on-site and off-site contributions.

LPAs should work with local partners, including the Local Environmental Record Centre and wildlife trusts, to share data and consider requirements for long term habitat monitoring. Monitoring requirements should be clear on what is expected from landowners who may be delivering biodiversity net gains on behalf of developers. This will be particularly important for strategic housing allocations and providing as much up-front information on monitoring will help to streamline the project stage.

### **Annex 2 - Climate change (further resources)**

Please see below links to further resources that may be useful in developing local policy to address climate change within the local authority area.

The [Climate Change Adaptation Manual](#) - provides extensive information on climate change adaptation for the natural environment. It considers the potential impacts of climate change on individual priority habitats and outlines possible adaptation responses. It includes the Landscape Scale Adaptation Assessment Method to assist those wanting to undertake a climate change vulnerability assessment for an area larger than an individual site or specific environmental feature, focussing on identifying vulnerabilities to climate change.

The [National Biodiversity Climate Change Vulnerability Model](#) is a mapping tool that helps identify areas likely to be more vulnerable to the impacts of climate change.

[Carbon Storage and Sequestration by Habitat 2021 \(NERR094\)](#) – a recently updated report that

reviews and summarises the carbon storage and sequestration rates of different semi-natural habitats that can inform the design of nature-based solutions to achieve climate mitigation and adaptation.

The [Nature Networks Evidence Handbook](#) – aims to help the designers of nature networks by identifying the principles of network design and describing the evidence that underpins the desirable features of nature networks. It builds on the Making Space for Nature report (Lawton et al. 2010), outlining some of the practical aspects of implementing a nature network plan, as well as describing the tools that are available to help in decision making.

[Natural England Climate Change webinars](#) - a range of introductory climate change webinars available on YouTube.

### **Annex 3 - Section 245 (Protected Landscapes) of the Levelling Up and Regeneration Act 2023**

Section 245 (Protected Landscapes) of the Levelling Up and Regeneration Act 2023 places a duty on relevant authorities in exercising or performing any functions in relation to, or so as to affect, land in a National Park, the Broads or an Area of Outstanding Natural Beauty (“National Landscape”) in England, to seek to further the statutory purposes of the area. The duty applies to local planning authorities and other decision makers in making planning decisions on development and infrastructure proposals, as well as to other public bodies and statutory undertakers.

It is anticipated that the government will provide guidance on how the duty should be applied in due course.

In the meantime, and without prejudicing that guidance, Natural England advises that:

- the duty to ‘seek to further’ is an active duty, not a passive one. Any relevant authority must take all reasonable steps to explore how the statutory purposes of the protected landscape (A National Park, the Broads, or an AONB) can be furthered.
- The new duty underlines the importance of avoiding harm to the statutory purposes of protected landscapes but also to seek to further the conservation and enhancement of a protected landscape. That goes beyond mitigation and like for like measures and replacement. A relevant authority must be able to demonstrate with reasoned evidence what measures can be taken to further the statutory purpose.
- The proposed measures to further the statutory purposes of a protected landscape, should explore what is possible in addition to avoiding and mitigating the effects of the development, and should be appropriate, proportionate to the type and scale of the development and its implications for the area and effectively secured. Natural England’s view is that the proposed measures should align with and help to deliver the aims and objectives of the designated landscape’s statutory management plan. The relevant protected landscape team/body should be consulted.

### **Annex 4 - Natural Environment Evidence for Local Plans**

\*Available on MAGIC: <https://magic.defra.gov.uk/MagicMap.aspx>\*

#### **Contents**

- Access
- Air Quality
- Climate Change

- Designated Sites
- Green Infrastructure
- Habitats And Species
- Historic Environment
- Landscape
- Natural Capital
- Net Gain
- Soils
- Water/Coast

Key evidence sources	Data Owner	Link to open data	*
<b>ACCESS</b>			
National Trails	Natural England	<a href="https://data.gov.uk/dataset/ac8c851c-99a0-4488-8973-6c8863529c45/national-trails">https://data.gov.uk/dataset/ac8c851c-99a0-4488-8973-6c8863529c45/national-trails</a>	
Public Rights of Way (on the Ordnance Survey base map) and Rights of Way Improvement Plans	Local Planning Authorities		
Open Access Land (under The Countryside and Rights of Way Act 2000)	Natural England	<a href="https://naturalengland-defra.opendata.arcgis.com/datasets/bd7c45905b95457db29297bb4ecb8e89_0?geometry=-18.518%2C50.559%2C14.858%2C55.195">https://naturalengland-defra.opendata.arcgis.com/datasets/bd7c45905b95457db29297bb4ecb8e89_0?geometry=-18.518%2C50.559%2C14.858%2C55.195</a>	✓
Local Nature Reserves	Local Planning Authorities and Local Wildlife Organisations		
National Nature Reserves	Natural England	<a href="https://data.gov.uk/dataset/726484b0-d14e-44a3-9621-29e79fc47bfc/national-nature-reserves-england">https://data.gov.uk/dataset/726484b0-d14e-44a3-9621-29e79fc47bfc/national-nature-reserves-england</a>	✓
Country Parks	Local Planning Authorities	Natural England have mapped Country Parks using data from Local Planning Authority data <a href="https://naturalengland-defra.opendata.arcgis.com/datasets/a11befa8e6dc4227a7082d81bb1ddb_db_0?geometry=-18.367%2C50.437%2C15.010%2C55.085">https://naturalengland-defra.opendata.arcgis.com/datasets/a11befa8e6dc4227a7082d81bb1ddb_db_0?geometry=-18.367%2C50.437%2C15.010%2C55.085</a>	✓
England Coast Path	Natural England	<a href="https://data.gov.uk/dataset/2cc04258-a5d4-4eea-823d-">https://data.gov.uk/dataset/2cc04258-a5d4-4eea-823d-</a>	✓

		<a href="https://publications.naturalengland.org.uk/publication/65021">bf493aa31eef/england-coast-path-route</a>	
Accessible Natural Greenspace Standards (ANGSt)	This standard is currently being updated by NE.	The current NE Standard is here: <a href="http://publications.naturalengland.org.uk/publication/65021">http://publications.naturalengland.org.uk/publication/65021</a>	
People and Nature Survey	Natural England	The MENE (Monitoring Engagement with the Natural Environment) dashboard <a href="https://defra.maps.arcgis.com/apps/MapSeries/index.html?appid=2f24d6c942d44e81821c3ed2d4ab2ada">https://defra.maps.arcgis.com/apps/MapSeries/index.html?appid=2f24d6c942d44e81821c3ed2d4ab2ada</a>	
	Natural England	The MENE survey results <a href="https://www.gov.uk/government/collections/monitor-of-engagement-with-the-natural-environment-survey-purpose-and-results">https://www.gov.uk/government/collections/monitor-of-engagement-with-the-natural-environment-survey-purpose-and-results</a>	
	Natural England	The People and Nature Survey <a href="https://www.gov.uk/government/collections/people-and-nature-survey-for-england">https://www.gov.uk/government/collections/people-and-nature-survey-for-england</a>  The GIS User hub <a href="https://people-and-nature-survey-defra.hub.arcgis.com/">https://people-and-nature-survey-defra.hub.arcgis.com/</a>	
<b>AIR QUALITY</b>			
Data on air pollution related to designated sites.	Centre for Ecology and Hydrology	The Air Pollution Information System <a href="http://www.apis.ac.uk/">http://www.apis.ac.uk/</a>	
Nitrogen Decision Framework	Joint Nature Conservation Committee (JNCC)	<a href="#">A decision framework to attribute atmospheric nitrogen deposition as a threat to or cause of unfavourable habitat condition on protected sites   JNCC Resource Hub</a>	
<b>CLIMATE CHANGE</b>			
The Climate Change Adaptation Manual data	Natural England	<a href="http://publications.naturalengland.org.uk/publication/5679197848862720">http://publications.naturalengland.org.uk/publication/5679197848862720</a>	
The National Biodiversity Climate Change Vulnerability Model	Natural England	<a href="http://publications.naturalengland.org.uk/publication/5069081749225472#:~:text=The%20National%20Biodiversity%20Climate%20Change,be%20used%20(in%20conjunction%20with">http://publications.naturalengland.org.uk/publication/5069081749225472#:~:text=The%20National%20Biodiversity%20Climate%20Change,be%20used%20(in%20conjunction%20with</a>	
<b>DESIGNATED SITES</b>			
Boundaries of Sites of Special Scientific Interest (SSSIs)	Natural England	<a href="https://data.gov.uk/dataset/5b632bd7-9838-4ef2-9101-ea9384421b0d/sites-of-special-scientific-interest-england">https://data.gov.uk/dataset/5b632bd7-9838-4ef2-9101-ea9384421b0d/sites-of-special-scientific-interest-england</a>	✓
Boundaries of Special Protection Areas (SPAs)	Natural England	<a href="https://data.gov.uk/dataset/174f4e23-acb6-4305-9365-1e33c8d0e455/special-protection-areas-england">https://data.gov.uk/dataset/174f4e23-acb6-4305-9365-1e33c8d0e455/special-protection-areas-england</a>	✓
Boundaries of Special Areas of Conservation (SACs)	Natural England	<a href="https://data.gov.uk/dataset/a85e64d9-d0f1-4500-9080-b0e29b81fbc8/special-areas-of-conservation-england">https://data.gov.uk/dataset/a85e64d9-d0f1-4500-9080-b0e29b81fbc8/special-areas-of-conservation-england</a>	✓

Boundaries of Ramsar Sites	Natural England	<a href="https://data.gov.uk/dataset/67b4ef48-d0b2-4b6f-b659-4efa33469889/ramsar-england">https://data.gov.uk/dataset/67b4ef48-d0b2-4b6f-b659-4efa33469889/ramsar-england</a>	✓
Boundaries of Marine Conservation Zones	Joint Nature Conservation Committee (JNCC)	<a href="https://jncc.gov.uk/our-work/marine-protected-area-mapper/">https://jncc.gov.uk/our-work/marine-protected-area-mapper/</a>	✓
SSSI Impact Risk Zones	Natural England	<a href="https://data.gov.uk/dataset/5ae2af0c-1363-4d40-9d1a-e5a1381449f8/sssi-impact-risk-zones-england">https://data.gov.uk/dataset/5ae2af0c-1363-4d40-9d1a-e5a1381449f8/sssi-impact-risk-zones-england</a>	✓
SSSI Conservation Objectives	Natural England	<a href="https://designatedsites.naturalengland.org.uk/">https://designatedsites.naturalengland.org.uk/</a>	
SAC, SPA, Ramsar and Marine equivalent Site Improvement Plans	Natural England	<a href="https://designatedsites.naturalengland.org.uk/">https://designatedsites.naturalengland.org.uk/</a>	
Local Wildlife Sites and Local Geological Sites	Local Planning Authority and/or Local Environmental Records Centre and/or Local Wildlife Trust		
Potential Designated Sites	Natural England	Mapping of potential SPA's can be found on MAGIC <a href="https://magic.defra.gov.uk/Dataset_Download_Summary.htm">https://magic.defra.gov.uk/Dataset_Download_Summary.htm</a>	✓
Existing HRA compensation sites	Local Planning Authority and Natural England		
Data on existing strategic solutions	Local Planning Authority and Natural England		
<b>GREEN INFRASTRUCTURE</b>			
National Green Infrastructure mapping database	Natural England	<a href="http://publications.naturalengland.org.uk/publication/4635531295326208">http://publications.naturalengland.org.uk/publication/4635531295326208</a>	
Green Infrastructure Framework – Principles and Standards for England	Natural England	<a href="https://designatedsites.naturalengland.org.uk/GreenInfrastructure/Home.aspx">https://designatedsites.naturalengland.org.uk/GreenInfrastructure/Home.aspx</a>	
Green Belt boundaries	Ministry of Housing, Communities and Local Government (MHCLG)	<a href="https://data.gov.uk/dataset/ccb505e0-67a8-4ace-b294-19a3cbff4861/english-local-authority-green-belt-dataset">https://data.gov.uk/dataset/ccb505e0-67a8-4ace-b294-19a3cbff4861/english-local-authority-green-belt-dataset</a>	✓
Open Space Assessments	Local Planning Authority		
Tree Canopy Cover Standards	Forestry Commission	<a href="https://www.gov.uk/guidance/urban-forestry">https://www.gov.uk/guidance/urban-forestry</a>	
<b>HABITATS AND SPECIES</b>			
Ancient Woodland	Natural England	<a href="https://data.gov.uk/dataset/9461f463-c363-4309-ae77-fdcd7e9df7d3/ancient-woodland-england">https://data.gov.uk/dataset/9461f463-c363-4309-ae77-fdcd7e9df7d3/ancient-woodland-england</a>	✓

Ancient and Veteran Trees	The Ancient Tree Inventory and Natural England	The Ancient Tree Inventory <a href="https://ati.woodlandtrust.org.uk/">https://ati.woodlandtrust.org.uk/</a>	
	Natural England	The wood pasture and parkland inventory <a href="https://data.gov.uk/dataset/bac6feb6-8222-4665-8abe-8774829ea623/wood-pasture-and-parkland-england">https://data.gov.uk/dataset/bac6feb6-8222-4665-8abe-8774829ea623/wood-pasture-and-parkland-england</a>	✓
Priority Habitat Inventory s41 habitats	Natural England	<a href="https://data.gov.uk/dataset/4b6ddab7-6c0f-4407-946e-d6499f19fcde/priority-habitat-inventory-england">https://data.gov.uk/dataset/4b6ddab7-6c0f-4407-946e-d6499f19fcde/priority-habitat-inventory-england</a>	✓
Priority Habitat Creation and Restoration	Environment Agency	<a href="https://data.gov.uk/dataset/e0165747-8368-4ff7-a644-df9aeb27bb0b/priority-habitat-creation-and-restoration">https://data.gov.uk/dataset/e0165747-8368-4ff7-a644-df9aeb27bb0b/priority-habitat-creation-and-restoration</a>	
Open Mosaic Habitat on Previously Developed Land Inventory (draft)	Natural England	<a href="https://data.gov.uk/dataset/8509c11a-de20-42e8-9ce4-b47e0ba47481/open-mosaic-habitat-draft">https://data.gov.uk/dataset/8509c11a-de20-42e8-9ce4-b47e0ba47481/open-mosaic-habitat-draft</a>	✓
Local Biodiversity Action Plans (LBAPs) and Local Geodiversity Action Plans (LGAPS)	Local Planning Authority		
Priority habitats and species as listed under Section 41 of the NERC Act, 2006 and UK Biodiversity Action Plan (UK BAP).	Local Environmental Record Centres		
National Forest Inventory on Trees and Woodland	Forest Research	<a href="https://data-forestry.opendata.arcgis.com/datasets/bcd6742a2add4b68962aec073ab44138_0?geometry=-35.371%2C51.075%2C31.382%2C59.761">https://data-forestry.opendata.arcgis.com/datasets/bcd6742a2add4b68962aec073ab44138_0?geometry=-35.371%2C51.075%2C31.382%2C59.761</a>	✓
Species Risks and Opportunities Maps	Natural England	<a href="http://publications.naturalengland.org.uk/publication/4674414199177216">http://publications.naturalengland.org.uk/publication/4674414199177216</a>	
<b>HISTORIC ENVIRONMENT</b>			
Designated Historic Environment Sites including scheduled monuments, listed buildings, registered parks and gardens, registered battlefields and protected wrecks	Historic England	The open data layers can be found on MAGIC <a href="https://magic.defra.gov.uk/Dataset_Download_Summary.htm">https://magic.defra.gov.uk/Dataset_Download_Summary.htm</a>	✓
World Heritage Sites	Historic England	<a href="https://data.gov.uk/dataset/3ac5c299-6805-476b-af9b-90aadc5e7b4/world-heritage-sites-gis-data">https://data.gov.uk/dataset/3ac5c299-6805-476b-af9b-90aadc5e7b4/world-heritage-sites-gis-data</a>	✓
National Historic Landscape Characterisation mapping	Natural England	<a href="https://naturalengland-defra.opendata.arcgis.com/datasets/624969d8bbc74c0abc2e6a277c986f74_0">https://naturalengland-defra.opendata.arcgis.com/datasets/624969d8bbc74c0abc2e6a277c986f74_0</a>	✓

Heritage Coasts data	Natural England	<a href="https://data.gov.uk/dataset/79b3515f-b00e-419a-9c7e-1d3163555886/heritage-coasts">https://data.gov.uk/dataset/79b3515f-b00e-419a-9c7e-1d3163555886/heritage-coasts</a>	✓
<b>LANDSCAPE</b>			
Areas of Outstanding Natural Beauty boundaries	Natural England	<a href="https://data.gov.uk/dataset/8e3ae3b9-a827-47f1-b025-f08527a4e84e/areas-of-outstanding-natural-beauty-england">https://data.gov.uk/dataset/8e3ae3b9-a827-47f1-b025-f08527a4e84e/areas-of-outstanding-natural-beauty-england</a>	✓
National Park boundaries	Natural England	<a href="https://data.gov.uk/dataset/334e1b27-e193-4ef5-b14e-696b58bb7e95/national-parks-england">https://data.gov.uk/dataset/334e1b27-e193-4ef5-b14e-696b58bb7e95/national-parks-england</a>	✓
National Park and Area of Outstanding Natural Beauty (AONB) management plans	Conservation Boards/ AONB Partnerships and National Park Authorities		
Local landscape character assessments	Local Planning Authority		
Landscape and Visual Impact Assessments	Local Planning Authority		
Landscape capacity and sensitivity assessments	Local Planning Authority		
Data on tranquillity and light pollution	Campaign to Protect Rural England (CPRE)	<a href="https://nightblight.cpre.org.uk/maps/">https://nightblight.cpre.org.uk/maps/</a>	
<b>NATURAL CAPITAL</b>			
National Character Areas	Natural England	<a href="https://data.gov.uk/dataset/21104eeb-4a53-4e41-8ada-d2d442e416e0/national-character-areas-england">https://data.gov.uk/dataset/21104eeb-4a53-4e41-8ada-d2d442e416e0/national-character-areas-england</a>	✓
Natural Capital Atlases: Mapping	Natural England	<a href="https://data.gov.uk/dataset/a9de8ea-a-5424-40ac-b1b3-3e33e94e1648/natural-capital-county-atlas-mapping-england">https://data.gov.uk/dataset/a9de8ea-a-5424-40ac-b1b3-3e33e94e1648/natural-capital-county-atlas-mapping-england</a>	
Natural Capital Atlases: Mapping Indicators for County and City Regions	Natural England	<a href="http://publications.naturalengland.org.uk/publication/6672365834731520">http://publications.naturalengland.org.uk/publication/6672365834731520</a>	
Nature Improvement Areas	Natural England	<a href="https://data.gov.uk/dataset/a19c95e3-9657-457d-825e-3d2f3993b653/nature-improvement-areas">https://data.gov.uk/dataset/a19c95e3-9657-457d-825e-3d2f3993b653/nature-improvement-areas</a>	✓
Nature Recovery Network data	Preliminary data from Local Nature Recovery Strategies should be available from the relevant Local Planning Authority		
Nature Networks Evidence Handbook	Natural England	<a href="http://publications.naturalengland.org.uk/publication/6105140258144256">http://publications.naturalengland.org.uk/publication/6105140258144256</a>	
Habitat Networks	Natural England	<a href="https://data.gov.uk/dataset/0ef2ed26-2f04-4e0f-9493-">https://data.gov.uk/dataset/0ef2ed26-2f04-4e0f-9493-</a>	✓



		<a href="https://www.gov.uk/government/publications/natural-capital-and-ecosystem-assessment-programme/natural-capital-and-ecosystem-assessment-programme">ffbdbfaeb159/habitat-networks-england</a>	
Natural Capital Ecosystem Assessment (NCEA)	Natural England under development	<a href="https://www.gov.uk/government/publications/natural-capital-and-ecosystem-assessment-programme/natural-capital-and-ecosystem-assessment-programme">https://www.gov.uk/government/publications/natural-capital-and-ecosystem-assessment-programme/natural-capital-and-ecosystem-assessment-programme</a>	
Living England Habitat Map	Natural England	<a href="https://data.gov.uk/dataset/e207e1b3-72e2-4b6a-8aec-0c7b8bb9998c/living-england-habitat-map-phase-4">https://data.gov.uk/dataset/e207e1b3-72e2-4b6a-8aec-0c7b8bb9998c/living-england-habitat-map-phase-4</a>	✓
Enabling a Natural Capital Approach	DEFRA	<a href="https://data.gov.uk/dataset/3930b9ca-26c3-489f-900f-6b9eec2602c6/enabling-a-natural-capital-approach">https://data.gov.uk/dataset/3930b9ca-26c3-489f-900f-6b9eec2602c6/enabling-a-natural-capital-approach</a>	
<b>NET GAIN</b>			
Biodiversity Net Gain metric 3.1	Natural England	<a href="https://nepubprod.appspot.com">The Biodiversity Metric 3.1 - JP039 (nepubprod.appspot.com)</a>	
Environmental Benefits from Nature Tool (Beta Test Version)	Natural England	<a href="https://nepubprod.appspot.com">The Environmental Benefits from Nature Tool - Beta Test Version - JP038 (nepubprod.appspot.com)</a>	
<b>SOILS</b>			
Provisional Agricultural Land Classification Maps	Natural England	<a href="https://data.gov.uk/dataset/952421ec-da63-4569-817d-4d6399df40a1/provisional-agricultural-land-classification-alc">https://data.gov.uk/dataset/952421ec-da63-4569-817d-4d6399df40a1/provisional-agricultural-land-classification-alc</a>	✓
Strategic mapping assigning the likelihood of BMV agricultural land (created as a companion to the Provisional ALC maps).	Natural England	<a href="http://publications.naturalengland.org.uk/category/5208993007403008">http://publications.naturalengland.org.uk/category/5208993007403008</a>	
Detailed ALC reports – post 1988 ALC survey	Natural England	<a href="http://publications.naturalengland.org.uk/category/6249382855835648">http://publications.naturalengland.org.uk/category/6249382855835648</a>	✓
General mapped information on soil types, including peaty soils, is available as ‘Soilscapes’. This also includes a simple ecosystem services provision guide.	National Soil Resources Institute (NSRI)	The open data layers can be found on MAGIC <a href="https://magic.defra.gov.uk/DatasetDownload_Summary.htm">https://magic.defra.gov.uk/DatasetDownload_Summary.htm</a>	✓
<b>WATER/COAST</b>			
Catchment Flood Management Plans	Environment Agency		
MMO marine planning evidence base	Marine Management Organisation (MMO)		
Shoreline Management Plans	Environment Agency		
Heritage Coast Management Plans	Local Planning Authority		
River Basin Management Plans	Environment Agency		
Water Resource Management Plans	Environment Agency /water authority		
Coastal erosion maps/ Coastal Change Management area data/strategies	Environment Agency / Local Planning Authority		

Shared Nitrogen Action Plans	Natural England - work ongoing	<a href="https://www.gov.uk/government/publications/clean-air-strategy-2019">https://www.gov.uk/government/publications/clean-air-strategy-2019</a>	
Strategic Flood Risk Assessments	Local Planning Authority led		



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08 March 2024

Dear Sir/Madam

## **NETWORK RAIL RESPONSE TO EAST HAMPSHIRE DISTRICT COUNCIL REGULATION 18 CONSULTATION**

Thank you for providing Network Rail the opportunity to make comment on the Regulation 18 version of the East Hants Local Plan.

It is important that opportunities to promote the use of the railway as a more sustainable mode of transport are identified and taken forward. The railway network is a vital element of the country's economy and a key component in the drive to deliver the Government's sustainable agenda.

Network Rail is the statutory undertaker for maintaining and operating railway infrastructure of England, Scotland, and Wales. As statutory undertaker, Network Rail is under license from the Department for Transport (DfT) and Transport Scotland (TS) and regulated by the Office of Rail and Road (ORR) to maintain and enhance the operational railway and its assets, ensuring the provision of a safe operational railway. As a matter of course, proponents of sites which are close to the railway boundary or sites which could affect the railway asset directly are required to engage with our Asset Protection and Optimisation team (ASPRO).

Network Rail has comments which we hope are of use to the Council and are keen to assist where possible to deliver these. In seeking to address the Council's housing requirements through the Local Plan, it is required that East Hants seek to meet this need as far as possible. This requires the Council to 'leave no stone unturned' in seeking to identify opportunities for housing and is clearly a key challenge for the new Local Plan. To help in

meeting this need, the Council are also required to fully consider opportunities around improving infrastructure to support growth. Network Rail, as a key provider of infrastructure, welcome the opportunity to work with the Council in securing the necessary improvements.

One of the most sustainable locations for housing provision is around transport nodes, such as railway stations, and the Council should give due consideration to these opportunities. Network Rail can support the Council on this should assistance be sought. Additionally, it is vital that the transport infrastructure required to support the level of growth that East Hants need to plan for is fully considered and is identified as a key priority for the Plan.

### **Rail network in East Hampshire**

There are a number of rail stations across the District however for the East Hampshire planning area this covers Alton, Bentley, Liphook and Rowlands Castle stations. Alton and Bentley stations are located on the Alton Line that provides services between Alton and London Waterloo. Liphook and Rowlands Castle are both located on the Portsmouth Direct Line, providing services between Portsmouth and London Waterloo. The service level is good but could be improved as could connectivity with other parts of the District that are not within a reasonable catchment of a station.

### **Development Growth**

Network Rail notes the proposed growth within the District and the anticipated delivery of a large proportion of development around Alton. As the main settlement within the planning area, it is expected that Alton would be identified for a significant amount of development.

Network Rail notes the settlement hierarchy proposed and agrees that Alton (Tier 1), Liphook and Whitehill & Borden (Tier 2) fall within their respective categories. Rowlands Castle and Bentley do have a mainline rail station and provide potential for growth, however based on existing facilities, then their identification as Tier 3 centres would be appropriate. However, Network Rail do not believe that Rowlands Castle and Bentley should fall any lower than Tier 3 within the hierarchy. We would support para 3.38 which recognises Tier 3 settlements as being sustainable locations.

### **Alton**

Alton rail station provides step free access to all platforms. This makes it an attractive station for users and should remain a central focus for rail passengers. Active travel links, through improved pedestrian and cyclists' routes to the rail station, should be encouraged from all development proposed within Alton. Given many of the proposed site allocations are located on the outskirts of Alton, it is imperative that active travel links are encouraged to reduce local congestion and make these allocations more sustainable. Improving links to the rail stations should be specifically referenced in all the draft allocations located in and around Alton. To support this, there is also scope for improvements to be secured at Alton station for enhanced cycle storage. This is identified as a need in the Infrastructure Delivery Plan and securing developer contributions towards this should be encouraged from new development in Alton.

### **ALT8 – Land at Neatham Manor Farm, Alton**

For the proposed new settlement on the edge of Alton, there is significant scope for providing new and enhanced walking and cycling links to encourage active travel to Alton

station. Network Rail would request specific reference is included within the Policy related to improving links to the rail station as part of consideration of new routes.

### **Whitehill and Bordon**

Network Rail notes the 667 dwellings proposed as part of the new Local Plan, in addition to existing permissions. This amount of development provides a strong basis for the comprehensive regeneration of the area. The new Local Plan notes the proximity of Bentley, Liphook and Liss rail stations to Whitehill and Bordon. The development opportunities afforded by the significant regeneration of the area provides scope for improving links to all three stations.

However, Liphook station has recently undergone significant improvements with the provision of an upgraded footbridge and lifts at both platforms to make it accessible for all. Due to this, Network Rail would encourage links to Liphook to be priorities for improvement to take advantage of these new upgrades. The provision of a mobility hub at Liphook station, providing direct active travel links to Whitehill and Bordon could provide the basis for these improvements. Network Rail and South Western Railway will work with the Council to help to deliver these improvements and we would encourage on-going engagement with the Council over this.

Network Rail notes much of Whitehill and Bordon falling in a 'CIL Island' given the lack of Levy implemented. Network Rail would encourage the Council to re-assess this given the scope of development proposed and the opportunities to better connect with other parts of the District.

### **Liphook**

Liphook rail station has seen significant improvements in recent years making it more accessible and encouraging its use should be a key priority of the Plan for development near to the station. The draft site allocations on the edge of the Liphook settlement boundary should be encouraged to provide improved active travel links to the rail station and Network Rail request that specific reference to this should be included within each of the allocations. Bus routes are currently poor and could be improved to help users accessing the station. A transport/mobility hub that links with Whitehill and Bordon would be beneficial in forming active travel and public transport links.

Network Rail believe that there is scope for intensification of sites within Liphook to ensure the Council's identifies suitable and deliverable sites for the Plan period. The accessible rail station should be a key facilitator for development and encouraging a modal shift away from the car.

### **Rowlands Castle**

Network Rail notes the quantum of development proposed in Rowlands Castle as well as its status as a Tier 3 settlement. Rowlands Castle benefits from its own rail station and as such this would promote opportunities for sustainable transport. Rowlands Castle rail station has no step free access and the opportunity exists to capture funding from nearby development to enhance access. Without enhancements, the station may not be able to support increased use given how well used it is compared to others within the LPA area. Station enhancements could allow for further development opportunities to be pursued in Rowlands Castle. Improved access and signage towards the rail station is also supported.

## Policy DCG1 – Infrastructure

Network Rail support the content of the draft Policy. In para DCG1.3, it is suggested that reference is made to the sentence ‘The delivery of necessary infrastructure will be secured by planning condition and/or, planning obligation and/or the Community Infrastructure Levy (*and its successor*)’.

## Policy DCG2: Sustainable Transport

Network Rail support the vision of encouraging development to the most sustainable locations. The rail network plays a key role in supporting modal shift and access to this should be enhanced where possible. In DCG2.2 para H, contributions should not be limited just to the strategic highway network. Reference should be included within this to the rail network as there are opportunities to fund improvements as a result of enhanced use. If the Local Plan promotes the public transport network, it should facilitate the encouragement of developer contributions to assist in funding improvements.

## Watercress railway

The Watercress Line operates as a heritage steam railway often used for events and does not run to a timetabled programme. There could be scope for an intensification of this line to potentially run additional commuter services. This could provide a further option for improving access through East Hampshire.

## Level crossings

Where people interact with level crossings on the railway, Network Rail is always aware of concerns around safety. Network Rail suggest that a specific Policy which considers the impact of railway crossings should be included within the new Local Plan.

As the experts in rail safety, Network Rail would be able to support the Council in developing an effective approach which ensures the safety of residents and other users without compromising the safe and efficient running of the railway.

## **Infrastructure Plan**

East Hampshire features the stations of Alton, Bentley, Liss, Liphook, Petersfield and Rowlands Castle. The council’s busiest station is Petersfield. After Petersfield it is then Liphook, followed by Alton with Liss at two-thirds that number and Bentley and Rowlands Castle below 120,000 entries and exits each. Within the planning area of East Hampshire, Liss and Petersfield fall outside the scope of the boundary therefore Liphook is the LPA’s busiest station.

The effects of coronavirus on the railway saw dramatic decreases in entries and exits throughout stations in East Hampshire district council. Alton and Bentley in particular suffered heavily seeing reductions in entries and exits in excess of 80-84 % and Liphook experiencing smaller reductions. Since then and with normal service largely resuming, the degree to which these stations have bounced-back can be measured by comparing 2019/20 to 22/23.

Of the stations, Rowlands Castle has seen the largest recovery reaching 91 % of the entries and exits observed pre-covid. At 81 and 83 % is Liss and Liphook with similar recovery numbers, and then Petersfield on 74 % and Alton 73 %. The station that has struggled the

most is Bentley which has seen a bounce-back of just 62%. With national figure showing an average of 79% recovery, it is evident that a trend of increasing leisure travel and return of office-working is continuing to drive strong passenger growth throughout the East Hampshire district, but that a noticeable shortfall remains at certain stations.

Station	Entries and Exits (2019/20)	Entries and Exits (2022/23)	% Bounce back from pre-covid
Alton	679,324	496,032	73%
Bentley	132,018	82,486	62%
Liss	328,618	267,766	81%
Liphook	633,798	525,416	83%
Rowlands Castle	123,718	112,942	91%
Petersfield	1,405,648	1,037,738	74%
<b>Average</b>			<b>77.3%</b>

Table 1: entries and exits of East Hampshire district council stations (includes stations outside planning area)

Two lines operate within the boundaries of East Hampshire district council. The Alton branch off the South West Main line includes the stations of Alton and Bentley and is operated by South Western Railway. The Alton line is electrified with 750V AC third rail and provides two trains per hour to London Waterloo. The Portsmouth Direct comprises of Liss, Liphook, Rowlands Castle and Petersfield. A variety of stopping and fast services operate up the Portsmouth Direct main line and into London Waterloo, the table below demonstrates how each station is served along this route.

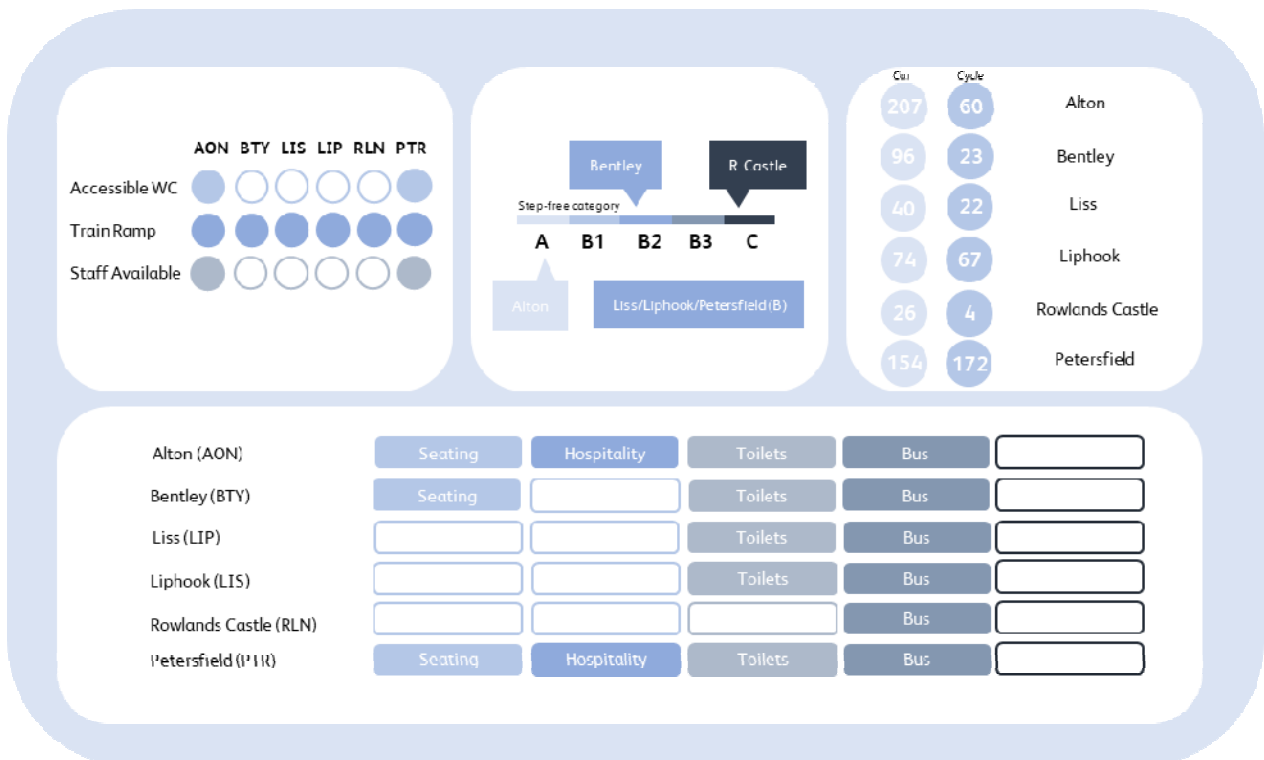


Figure 2: key summary information on East Hampshire district council stations

Accessibility at the stations within the district are generally good. Notably, Rowlands Castle features relatively poor accessibility however, with no part of the station suitable for those requiring assistance. Just two of the stations feature hospitality (cafes and restaurants in the station) and none have any retail options for passengers. A level of bus connectivity is available at all stations with aspirations for more services to connect

nearby towns and villages running from each of East Hampshire's rail stations and services.

The above graphic provides a high-level analysis of car and cycle space at each station. This gives us an idea of how over or undersubscribed each station is with regards to facilities for those accessing the station by car or bicycle.

Station	Car space as % of daily entries/exits	Cycle space as % of daily entries/exits
<b>Alton (AON)</b>	20 %	6 %
<b>Bentley (BTY)</b>	54 %	13 %
<b>Liss (LIS)</b>	6 %	3 %
<b>Liphook (LIP)</b>	6 %	5 %
<b>Rowlands Castle (RLN)</b>	10 %	2 %
<b>Petersfield (PTR)</b>	6 %	7 %

*Table 2: car and cycle spaces as a percentage of daily entries and exits*

The above data tells us that some stations are more accommodating of cycle and car users than others, with Bentley offering more than sufficient cycle and car spaces for every entry and exit at the station and Liss on the lower end for both cycle and car. What is important to understand and is not shown in this high-level table, however, is that passengers may access the stations in several ways. Where car spaces are low at Liphook, for example, this may be more representative of fewer people using the car to travel to the station, rather than a deficiency in parking spaces. From an overall point of view, this data can be used to earmark where improvements can be made with an emphasis on encouraging active travel reflected in the need for greater numbers and quality of cycle storage at stations throughout the district. Bentley and Liphook stations would benefit from enhanced parking provision to support modal choice at the station and reduce on-street parking unless a more sustainable and robust travel option can be implemented.

East Hampshire is home to the 'East Hampshire Community Rail Partnership (CRP)'. CRPs are local organisations aimed at bringing together local groups and stakeholders along railway lines to work with industry, providing a number of community engagement and promotional activities. Initiatives range from people helping to maintain station gardens to major refurbishment schemes. East Hampshire Community Rail partnership, specifically, aims to:

- Promote the train services at Liphook, Liss, Petersfield and Rowlands Castle stations.
- Encourage use of the train services and stations as access gateways to the South Downs National Park.
- Encourage partners such as local businesses, community organisations, and volunteers to become more involved with the stations and services.
- Enable the rail industry to work with local tourist attractions and the South Downs National Park to attract more visitors to access the area by train.
- Provide a means to enhancing the environment and facilities at each station.

### Current Railway Projects

Recently completed schemes within East Hampshire, include the forecourt refurbishments that took place at Alton station. The alterations intend to enhance passenger access to the station entrance and improve integration with connecting transport to the station.



The scope included a reconfiguration of pedestrian cycle and vehicle access and egress at the station, a reconfiguration of taxi bays and bus stops in addition to the installation of a new bus stop. The car parking bays were also be modified to improve layout and pedestrian access routes. Alongside this, the access steps leading from the forecourt to the highway were also modified to improve safety as part of the works.

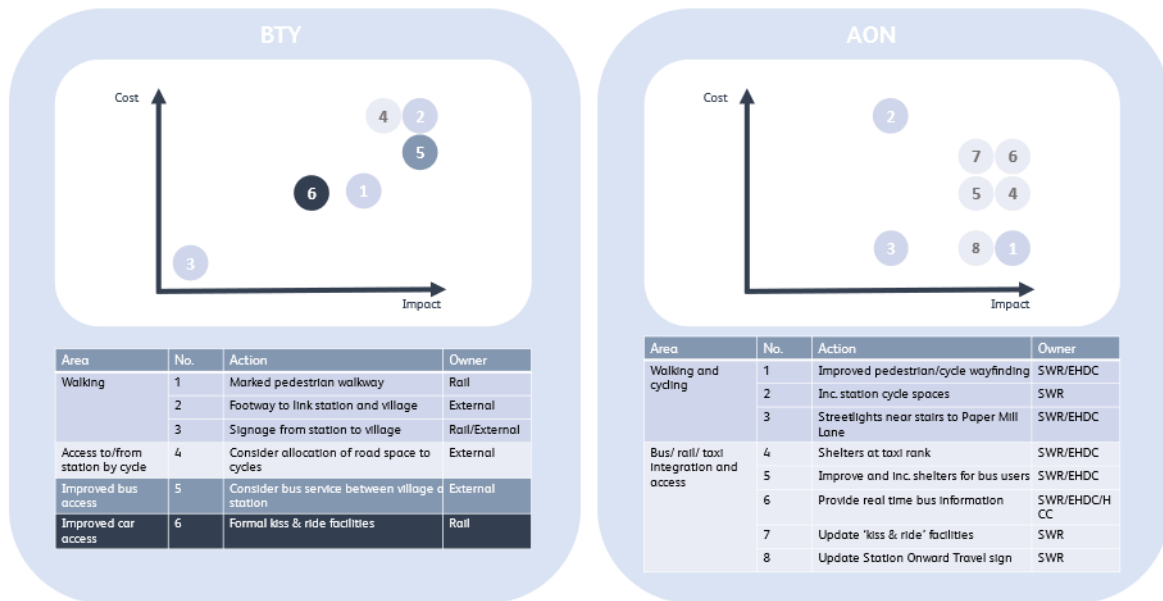
Plans are also in place to close two high-risk footpath level crossings (Alice Holt and Buckthorne Oak Level Crossing) at Bentley station following a fatality. The scheme proposes a new station footbridge with steps and a lift to provide disabled access. As of Spring this year, Network Rail have submitted proposals to Hampshire County Council to close and divert footpaths as a first step in removing the crossings at Buckthorn Oak and Alice Holt.

Opportunities for station enhancements

Station Travel Plans devised by South Western Railway have identified a catalogue of potential improvements and developments that could be made at stations within East Hampshire, the table below provides a selection of possible projects that could take place to enhance the stations from access to transport integration, with each proposal ranked by impact and cost as per the travel plans.

Below sets out the preferred improvements proposed to increase passenger experience at the four main stations within the LPA area, Bentley (BTY), Alton (AON), Liphook (LIP) and Rowlands Castle (RLN).

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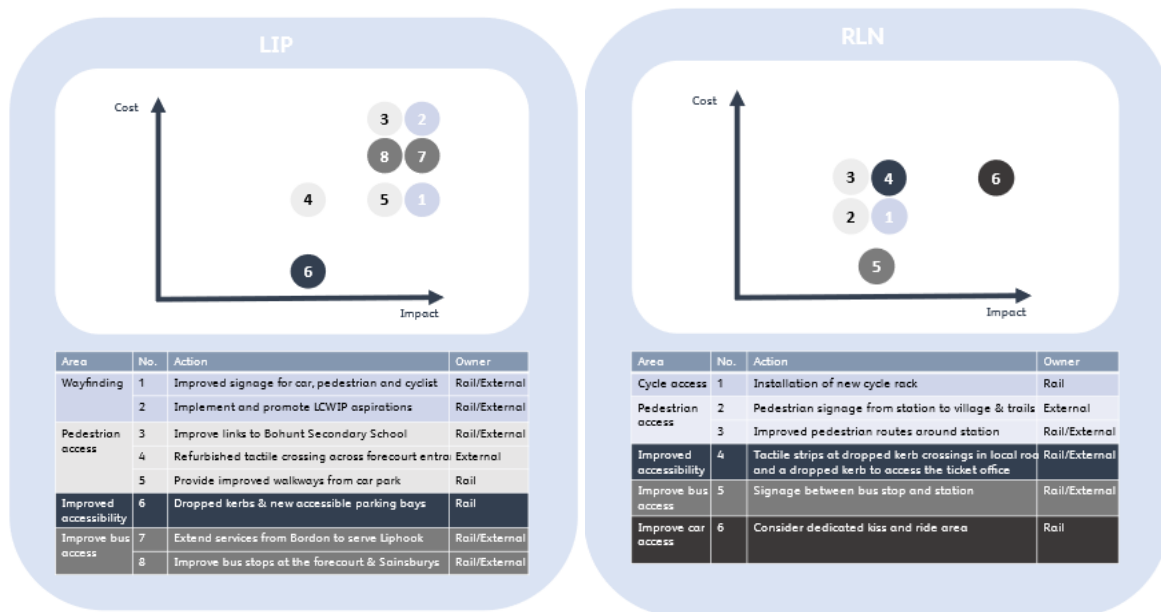


Figure 3: key summary of improvements at stations within East Hants

**Infrastructure summary**

Network Rail have sought to capture the most pressing infrastructure needs to align with the emerging Local Plan and provide justification for developer contributions from current and future planning applications. There are a range of improvements as outlined above through SWR’s Station Travel Plans, which could be tied to the draft site allocations and policies within the emerging Local Plan.

Rowlands Castle rail station has no step free access and Network Rail would support financial contributions from development in Rowlands Castle helping to fund accessibility improvements at the rail station. Without improving access, Network Rail has concerns over the stations’ ability to take an increase in users generated by the development proposed in the Plan. As noted above, Rowlands Castle has the highest use in the District following Covid-19 and requires upgrades to support both this and future use.

Lead Agency	Network Rail Department for Transport Rail operators (South Western Railway)
Key evidence	Office of Rail and Road Publications <a href="#">Wessex Main Lines Study</a> (2023)
Existing facilities	The Planning Authority Area is relatively well connected with four Railway Stations. Alton and Bentley are both located on the Alton Line that provides services between Alton and London Waterloo. Liphook and Rowlands Castle are both located on the Portsmouth Direct Line that provides services between Portsmouth and London Waterloo.
Planned provision	Future enhancements to rail services and infrastructure are developed through industry collaboration involving the Department for Transport, Train Operating companies and Network Rail.

Key Issues	<p>In order to enable an increase to the service level for stations residing in the East Hampshire District Council area, it is important to understand and overcome the constraints that currently prevent this.</p> <p>One such constraint is capacity at Woking Junction. One solution for this would be the implementation of a grade separated junction at Woking providing mitigation to conflicting services and congested infrastructure at one of the most pivotal parts of the network. Undertaking improvements such as this will offer relief to the wider network with knock-on effects being the potential to increase service level to East Hants stations, making use of now available capacity.</p> <p>Another constraint for this district is capacity at Haslemere. A proposed centre turnback at Haslemere would help quell these issues and allow for the quicker movement of trains in different directions without compromising on capacity. The proposal will see Haslemere utilise platform two more regularly as a centre turnback and increase line speeds into platform one for through-trains, potentially reducing journey times.</p> <p>Another proposal targeting improved journey times is additional track capacity between Liphook and Petersfield via an additional loop to allow a fast, non-stopping service to operate.</p>
Infrastructure needs	<ul style="list-style-type: none"> <li>• Enhancements to Alton rail station cycle storage facilities and improved cycle and walking links to the rail station</li> <li>• Expansion of Bentley rail station car park</li> <li>• Improvements towards step free access at Rowlands Castle rail station</li> <li>• Improved active travel links to Liphook station</li> </ul> <p>In addition to the above, figure 3 sets out other improvements that should also be included.</p>
Potential Funding Sources	<p>Developer Contributions CIL HCC</p>
Implications for the East Hampshire Local Plan	<p>The proposals for housing and employment development in addition to encouraging alternative modes of transport to the car has the potential to increase passenger traffic on the rail network.</p>

## Summary

The rail network within East Hampshire provides a good basis to around which to pursue development opportunities and promote sustainable transport as a genuine alternative to using the car. Additionally, Network Rail would encourage East Hants to include the rail network as a key priority/opportunity within the new Local Plan and to develop policies and site allocations which promotes the rail network through encouraging its use,

capturing funding for rail network improvements and exploring opportunities to maximise development around rail stations.

Network Rail are keen to continue to work with the Council and other stakeholders in helping to deliver transport and infrastructure improvements for the benefit of residents of East Hampshire.

I trust the above is of use and if there any issues raised that needs further discussion then please do not hesitate to contact me.

Kind regards,

**██████████ MRTPI**  
**Senior Town Planner**

# **Draft Local Plan 2021-2040 East Hampshire District Council (EHDC)**

## **Consultation February - March 2024**

Portsmouth Water thank you for the opportunity to respond to the EHDC Draft Local Plan 2021-2040

Portsmouth Water has considered the draft EHDC Local Plan in relation to water quality, supply and efficiency and biodiversity.

Our response in relation to each matter is set out below.

### **1. Water Quality and Quantity**

#### **1.2 Policy NBE8 Water Quality, Supply and Efficiency**

Portsmouth Water welcome this strategy and are pleased to see the requirement stated in NBE8.2 for developments to *“meet strict environmental standards for adequate wastewater treatment and may be required to incorporate well designed mitigation measures to ensure the water environment does not deteriorate, both during construction and during the lifetime of the development.”*

We support the ambitious target set out by EHDC in section NBE8.4 to require all new dwellings to meet a water efficiency standard of 95 litres per person per day. Given the high demand for water supply in the South East and its classification of being an area under ‘serious water stress’ we fully support this target. In order to save water and reduce usage Portsmouth Water are rolling out a smart metering program to target leakage and raise awareness of household consumption.

#### **1.3 Policy Water Quality Impact on the Solent International Sites**

Portsmouth Water fully support this policy as it is in alignment with our catchment management approach, which focuses on reducing Nitrate run-off from agricultural activities within our catchments. Our recommendations for how this policy can be further supported is discussed in more detail below in section 3; Development Management Policies.

#### **1.4 Policy NBE13 Protection of Natural Resources**

Portsmouth Water welcome this strategic policy as the policy is essential to the protection of groundwater quality and quantity. We are pleased to see stated within the policy, that development proposals *“Do not result in a reduction in the quality or quantity of groundwater resources; this includes the protection of principal aquifers and the source protection zones within the southern part of the Local Plan Area;”*.

We also welcome that the policy recognises that development proposals must not give rise to contamination or water pollution, where the level of discharge could cause harm to sensitive receptors such as Source Protection Zones.

## **2. Flood Risk**

### **Policy NBE7 Managing Flood Risk**

We support this policy and the emphasis on Sustainable Drainage Systems (SuDS). SuDS help to control runoff and protect the water environment from new developments. We are also happy to see that maintenance and management of SuDS systems must be included. This is vital to water quality; if suds systems are not maintained sufficiently, the level of functionality in water treatment is significantly reduced.

## **3. Development Management Policies**

Section 11 of the draft local plan lists all development management policies. We recommend that a policy is designed for Aquifer Source Protection Zones.

Portsmouth Water have recently been consulted by Havant Borough Council who have provided a draft policy for comment, in recognition of the Havant and Bedhampton Springs Principal Aquifer, that is situated within the southern area of the EHDC local plan.

We recommend that a similar approach is adopted by EHDC to support the overall need to protect groundwater quality and aid in the implementation of Policy NBE8; Water Quality, Supply and Efficiency. We also believe that an aquifer protection policy could, if granted, further support the implementation of Policy NBE9; Water Quality Impact on the Solent International Sites, NBE2 Biodiversity, geodiversity and nature conservation and Policy NBE3: Biodiversity Net Gain.

Freshwater flows from the Havant and Bedhampton springs groundwater catchment are directly linked to the internationally designated Langstone harbour (SSSI, SPA, SAC and Ramsar). The quality of the Havant and Bedhampton spring groundwater is paramount. If any contamination were to occur from activities within the catchment this could impact the health of the harbour(s).

Furthermore, an aquifer protection policy would complement the catchment management approach adopted by Portsmouth Water. This approach aims to address pollution at its origin, within the catchment, to prevent deterioration of water quality within the chalk aquifer, which supports the supply of public drinking water for the southern area of the EHDC local plan.

Justification for our recommendation for an aquifer protection policy is set out below.

### **3.1 Developments in a Source Protection Zone**

The Havant and Bedhampton springs are unique due to the local geology and their prolific nature - Chalk groundwater emerges from the springs in high volumes, even during drought conditions. As such the Havant and Bedhampton springs have recently been nominated by the British Geological Survey (BGS) to be internationally recognised due to their importance.

The Havant and Bedhampton springs supply the City of Portsmouth and the Havant district (population circa 250,000, including MOD sites, key regional hospitals, schools etc) with a plentiful

supply of water, even during drought periods. They also provide an essential input of fresh water into Langstone Harbour which influences/supports the biodiversity and ecology of the harbour, which is a designated SSSI, SPA, SAC and RAMSAR site. In addition to this, the Havant and Bedhampton springs will be used to feed the Havant Thicket Reservoir, which will be a regionally important public water resource, which will allow Portsmouth Water to support its neighbouring water companies.

The geology of the Havant and Bedhampton springs catchment is deemed to be karstic in nature; a karst landscape is associated with bedrock of a soluble nature, Chalk in this instance, where cracks and fractures in the Chalk rock become enlarged over many thousands of years. These enlarged fractures and cracks are known as fissures and conduits, which allow groundwater to flow very rapidly underground i.e. kilometres per day. Karst features can be found at the surface and also in the subsurface. Whilst the karstic nature of the catchment results in the springs being highly productive, it also means they are highly vulnerable to contamination.

Development within the Source Protection Zone for the Havant and Bedhampton springs must be undertaken in a manner that protects them from contamination due to their significance for public water supply and supporting biodiversity.

For developments within Source Protection Zones key risks will need to be accounted for at an early stage of any development and risk assessments, qualitative and/or quantitative should be contextualised in a Conceptual Site Model (CSM). This should identify all potential source, pathway and receptor linkages.

From a water quality perspective Portsmouth Water's key areas of concern for any development within groundwater source protection zone include the following;

- Environmental risk management
- Pilling and Foundations
- Land Contamination (i.e brownfield developments)
- Solution features (karst)
- Foul and surface drainage

These are the key matters we consider when reviewing planning applications within a Source Protection Zone (SPZ).

### **3.1.1 Environmental Risk Management**

Portsmouth Water are required to assess how risk is managed during the construction phase of any development within an SPZ to ensure that water resources are not put at risk. Construction phase pollution can originate from a number of sources including chemical and hydrocarbon storage, refuelling practices and insufficient management of overland run-off. Details provided through the submission of an adequate Construction and Environmental Management Plan (CEMP) are vital to our assessment of the risks associated with the construction phase of developments within SPZ's.

Portsmouth Water advise that any development within an SPZ is accompanied by Construction Environmental Management Plan (CEMP) to ensure water resources are not put at risk from

fugitive emissions during construction. The plan should detail all pollution mitigation measures to be adopted during the construction phase. This should include management of overland runoff, storage of hazardous materials, chemical and hydrocarbons on site and temporary drainage infrastructure to ensure that water resources are not put at risk from leaks or spillages.

A satisfactory CEMP should include information such as spill response plans, emergency contact details (if a spill were to occur) and equipment to be used to prevent any spills or to deal with a spill if one were to occur. Given the rapid travel times within SPZ's and the presence of solution features, it is vitally important that these details are established before the construction stage and that action is taken in a timely manner if any spill were to occur.

### **3.1.2 Pilling and Foundations**

Pilling and penetrative or vibro ground improvement methods present a considerable risk to the groundwater environment and thus water quality. Penetration and vibration can create preferential pathways that can constitute very fast travel times through the chalk aquifer, through which, contaminants and sediment can travel, to our abstraction boreholes.

Sediment, referred to as turbidity, presents a significant risk to public water supply abstractions. Elevated turbidity impacts on the disinfection process (i.e. reduced efficiency) and is also usually associated with increases in pathogens concentrations, such as *Cryptosporidium* and *E. coli*. If increased turbidity is detected, and there is no filtration process at the affected Water Treatment Works (WTWs), the abstraction must be shut down until the turbidity has passed through the aquifer or until other mitigations have been implemented. Not all of Portsmouth Water's WTW's have sufficient treatment infrastructure to contend with increases in turbidity i.e. filtration.

In consideration of the above, the Government Housebuilding Targets present an ever-increasing risk to the groundwater environment, water quality and water supply.

### **3.1.3 Land Contamination**

Pilling and penetrative ground improvement methods are commonly used for developments on brownfield sites where there is potential for land contamination. Brownfield developments within source protection zones require detailed assessment of any risk to all receptors that may be affected, including those off site. Dependent on the findings of the Conceptual Site Model (CSM) an intrusive site investigation may be required. Full details of any remediation measures, including how any measures are to be undertaken, will need to be included.

### **3.1.4 Ground preparation and Importation and use of soils**

Ground improvement and preparation methods for new developments present a risk to water quality. Soil stripping has the potential to cause turbidity issues and the use of some types of aggregate could present a risk to water quality if leaching occurs.

Imported soil and/or end of waste' manufactured aggregates are used to improve and prepare ground for new developments. End of waste manufactured aggregate can contain a significant



number of chemical and heavy metals which could present a risk to water quality if leaching occurs. A material analysis report from a UCAS accredited laboratory and details on the frequency of testing by the manufacturer are required in order for us to assess this risk.

Submission of a concise Materials Management Plan will also be required. This needs to detail methods for stockpiling and storage, and any environmental constraints e.g if works are to stop after heavy rain. Measures to manage over land run-off should also be included i.e drainage plans to be utilised during the construction phase.

### **3.1.5 Solution (karst) Features**

The Havant and Bedhampton springs catchment is prone to the development of solution features in the Chalk, otherwise known as Karst features. These features can be found at the ground surface and underground in the aquifer itself. These features allow for rapid transmission of surface water into the aquifer, with limited potential for natural attenuation of contaminants due to very short travel times.

An assessment of the likelihood of solution features within a development site should be undertaken and measures implemented to prevent any features posing a risk to groundwater quality.

### **3.1.6 Surface Water and Foul Water Drainage**

Portsmouth Water are required to undertake a detailed review of any drainage schemes within Source Protection Zones (SPZ).

#### **Surface Water Drainage;**

**SPZ1;** Due to the sensitivity of the groundwater environment any drainage plans for developments within Source Protection Zone 1 (SPZ1) will need to be based on a comprehensive review of the hydrological and hydrogeological setting of the development. Details must be approved before the commencement of any phase of the development and details of how the scheme shall be maintained and managed must also be included.

Details of on-site drainage schemes during the construction phase of development should be included with a Construction Environmental Management Plan (CEMP).

Drainage designs within any SPZ should be based on sustainable principles and must be in accordance with the Ciria Sustainable Urban Drainage (SuDS) manual C753.

Portsmouth Water would object to any development within SPZ 1 whereby deep bore soakaways are proposed as part of the drainage plans.

#### **Foul Water Drainage;**

Portsmouth Water are required to review drainage designs in detail. Any developments within SPZ require the highest spec pipework and designs to minimise leakage in order to protect water quality. Detailed layout and specifications are required especially in areas of the catchment

where solution features are present. How the scheme shall be maintained and managed after completion is also needed.

### 3.2 Policy DM22 Equestrian and Stabling Development

Horse-related development can have a direct impact on groundwater quality (faecal pathogens, nitrate, turbidity). Policy DM22 should also state that the ‘development does not result in a reduction in the quality or quantity of groundwater resources; this includes the protection of principal aquifers and the source protection zones associated with public water supply within the southern part of the district’.

### 3.3 Site Allocations

The plan indicates potential sites for development, there are ten non-strategic sites which are located within a Groundwater Source Protection Zone (SPZ) for our public water supply within the plan area. These zones are areas which are sensitive in terms of water quality given our abstraction of potable water.

In addition to this we have the following comment regarding the Havant Thicket Reservoir Project:

Construction has commenced on our regionally significant Havant Thicket Reservoir Project. The previous allocation of land for the reservoir appears not to have been carried forward, and we would like to request that this is reinstated in the new plan proposals. Whilst the project now has planning permission, the construction of the reservoir is a long term project and a critical piece of infrastructure for the District and Region. The site needs to be protected from other developments and proposals, and any development proposed in the vicinity of the reservoir site should be subject to consultation with Portsmouth Water.

Site Allocations	Location	Proposed Number of Homes	Comments
<b>Horndean</b>			
HDN1 – Land at Woodcroft Farm	394 SU6824412210	<b>164</b>	Source Protection Zone 1.  This site is underlain by Lambeth Group overlying Chalk. This geological situation is prone to solution feature formation. Solution features are present in the immediate vicinity. These can act as a rapid pathway to the Havant and Bedhampton springs and therefore a risk to public water supplies is present. Groundwater in the Chalk is relatively shallow in this area (>20 mbgl) and the

			<p>presence of solution features increases the risk profile of the site.</p> <p>Any development of this site requires an assessment for the likelihood of the presence of solution features and groundwater protection measures must be considered during the construction phase and over the lifetime of the development.</p>
HDN2 – Land south of Five Heads Road	397 SU6987313696	<b>118</b>	<p>Source Protection Zone 1.</p> <p>This site is underlain with Clay with Flints formation which overlies the Chalk aquifer. This geological situation is prone to solution feature formation. Solution features are present in the immediate vicinity. These can act as a rapid pathway to the Havant and Bedhampton springs and therefore a risk to public water supplies is present. Groundwater in the Chalk is relatively deep in this area (&gt;40 mbgl) but the presence of solution features increases the risk profile of the site.</p> <p>Any development of this site requires an assessment for the likelihood of the presence of solution features and groundwater protection measures must be considered during the construction phase and over the lifetime of the development.</p>
HDN3 – Land north of Chalk Hill Road	400 SU7023413682	<b>38</b>	<p>Source Protection Zone 1.</p> <p>This site is underlain with Clay with Flints formation which overlies the Chalk aquifer. This geological situation is prone to solution feature formation. Solution features are present in the immediate vicinity. These can act as a rapid pathway to the Havant and Bedhampton springs and therefore a risk to public water supplies is present. Groundwater in the Chalk is relatively deep in this area (&gt;40 mbgl) but the presence of solution features increases the risk profile of the site.</p>

			Any development of this site requires an assessment for the likelihood of the presence of solution features and groundwater protection measures must be considered during the construction phase and over the lifetime of the development.
<b>Rowlands Castle</b>			
RLC1 – Land at Deerleap (North)	440 SU7319910604	<b>5</b>	<p>Source Protection Zone 1.</p> <p>This site is located on the featheredge of the Lambeth Group and the Chalk aquifer. This geological situation is prone to solution feature formation. Solution features are present in the immediate vicinity. These can act as a rapid pathway to the Havant and Bedhampton springs and therefore a risk to public water supplies is present. Groundwater in the Chalk is very shallow and the presence of solution features increases the risk profile even further of the site.</p> <p>There is a proven rapid transport time to the Havant and Bedhampton springs from this locality. Portsmouth Water would object to the use of deep bore soakaways on this site.</p> <p>Any development of this site requires an assessment for the likelihood of the presence of solution features and groundwater protection measures must be considered during the construction phase and over the lifetime of the development.</p> <p>Within SPZ1 and shallow groundwater environment's, we have presumption against piling as this can lead to pollution. We therefore expect to see a piling risk assessment (environmental) to be produced to assess the risks and develop mitigation measures to protect impacts to groundwater quality.</p>
RLC2 – Land at Deerleap (South)	443	<b>8</b>	<p>Source Protection Zone 1.</p> <p>This site is located on the featheredge of the Lambeth Group and the Chalk</p>

			<p>aquifer. This geological situation is prone to solution feature formation. Solution features are present in the immediate vicinity. These can act as a rapid pathway to the Havant and Bedhampton springs and therefore a risk to public water supplies is present. Groundwater in the Chalk is very shallow and the presence of solution features increases the risk profile even further of the site.</p> <p>There is a proven rapid transport time to the Havant and Bedhampton springs from this locality. Portsmouth Water would object to the use of deep bore soakaways on this site.</p> <p>Any development of this site requires an assessment for the likelihood of the presence of solution features and groundwater protection measures must be considered during the construction phase and over the lifetime of the development.</p> <p>Within SPZ1 and shallow groundwater environment's, we have presumption against piling as this can lead to pollution. We therefore expect to see a piling risk assessment (environmental) to be produced to assess the risks and develop mitigation measures to protect impacts to groundwater quality.</p>
RLC3 – Land at Oaklands House	446 SU7294209762	<b>51</b>	<p>Source Protection Zone 4 – zone of special interest.</p> <p>This site is underlain by Clay deposits associated with the Lambeth Group, potentially of significant thickness. Groundwater will be present directly below the Lambeth Group, and groundwater travel times to the H&amp;B springs will be rapid.</p> <p>If the clay deposits are not penetrated this site is potentially low risk for groundwater.</p>

			<p>There is a proven rapid transport time to the Havant and Bedhampton springs from this locality. Portsmouth Water would object to the use of deep bore soakaways on this site.</p> <p>Any development of this site requires an assessment for the likelihood of the presence of solution features and groundwater protection measures must be considered during the construction phase and over the lifetime of the development.</p>
RLC4 – Land at Little Leigh Farm	448 SU7285808754	<b>81</b>	<p>Source Protection Zone 1c.</p> <p>The site is underlain by London Clay of considerable thickness and therefore the Chalk aquifer is protected, unless the London Clay is penetrated.</p> <p>Portsmouth Water would object to the use of deep bore soakaways on this site.</p> <p>Any development of this site requires an assessment for the likelihood of the presence of solution features and groundwater protection measures must be considered during the construction phase and over the lifetime of the development.</p>
<b>South Area</b>			
CTN1- Land at Parsonage Farm	476 SU6932213991	<b>6</b>	<p>Source Protection Zone 1.</p> <p>This site is underlain with Clay with Flints formation which overlies the Chalk aquifer. This geological situation is prone to solution feature formation. There are no mapped solution features in the vicinity but they may be present with no surface expression. If present, these features can act as a rapid pathway to the Havant and Bedhampton springs and therefore a risk to public water supplies could be present. Groundwater in the Chalk is deep in this area (&gt;45 mbgl) but the potential presence of solution features increases the risk profile of the site.</p>

			Any development of this site requires an assessment for the likelihood of the presence of solution features and groundwater protection measures must be considered during the construction phase and over the lifetime of the development.
CTN2 – Land at the Dairy	478 SU6933114134	<b>7</b>	<p>Source Protection Zone 1.</p> <p>This site is underlain with Clay with Flints formation which overlies the Chalk aquifer. This geological situation is prone to solution feature formation. There are no mapped solution features in the vicinity but they may be present with no surface expression. If present, these features can act as a rapid pathway to the Havant and Bedhampton springs and therefore a risk to public water supplies could be present. Groundwater in the Chalk is deep in this area (&gt;50 mbgl) but the potential presence of solution features increases the risk profile of the site.</p> <p>Any development of this site requires an assessment for the likelihood of the presence of solution features and groundwater protection measures must be considered during the construction phase and over the lifetime of the development.</p>
LOV1 – Land rear of 191-211 Lovedean Lane	480 SU6839712875	<b>30</b>	<p>Source Protection Zone 1.</p> <p>This site is underlain with Chalk which forms the principal aquifer used for public water supply.</p> <p>There are no mapped solution features within the site boundary, however there are many present in the local vicinity so there is potential that solution features could be present on site.</p> <p>Groundwater is relatively shallow (&gt;15mbgl).</p> <p>Any development of this site requires an assessment for the likelihood of the</p>

			<p>presence of solution features and groundwater protection measures must be considered during the construction phase and over the lifetime of the development.</p> <p>Within SPZ1 and shallow groundwater environment's, we have presumption against piling as this can lead to pollution. We therefore expect to see a piling risk assessment (environmental) to be produced to assess the risks and develop mitigation measures to protect impacts to groundwater quality.</p>
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#### 4. Biodiversity

##### **NBE2 Biodiversity, Geodiversity and Nature Conservation**

We support this policy but for Bullet b that references biodiversity features including priority habitat types and species and irreplaceable habitats we suggest it would be helpful if the following could be added *'if not possible, offset measures will be taken to compensate for any significant residual, adverse impacts that cannot be avoided or where there is projected loss of biodiversity'*.

##### **NBE3 Biodiversity Net Gain**

We support this policy.

#### 5. NBE 1 Development in the Countryside

In addition, and for your consideration we note the following:

Re Bullet K we would suggest that 'small scale' is deleted as this contradicts para 5.12 below that states: 'The redevelopment of suitably previously developed land in the countryside will be encouraged provided that the proposal would not cause harm to areas of high environmental value and the proposed use and scale are appropriate to the site's rural context and setting'.

Catchment Management Team

Portsmouth Water

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Penns Place  
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Hampshire  
GU31 4EX

04 March 2024

**SENT BY EMAIL**

Dear Sir / Madam,

**Draft East Hampshire Local Plan 2040 (Regulation 18 Consultation)**

Thank you for consulting the South Downs National Park Authority (SDNPA) on the Draft East Hampshire Local Plan 2040.

The **National Parks & Access to the Countryside Act 1949**, as amended by Section 245 of the Levelling Up & Regeneration Act (LURA) 2023, requires all relevant bodies – including East Hampshire District Council (EHDC) – to seek to further the purposes of the South Downs National Park (SDNP). The National Park purposes are:

- 1) To conserve and enhance the natural beauty, wildlife and cultural heritage of the area; and
- 2) To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public.

**Duty to Cooperate (DtC)**

We support EHDC's continuing liaison with neighbouring authorities, including the SDNPA, to ensure that cross-boundary strategic priorities are fully addressed. A Statement of Common Ground (SoCG) was signed between both Authorities on 18 January 2024. The SoCG is an iterative document which will be amended as both Local Planning Authorities (LPAs) progress with their respective local plans. In terms of the next iteration of the SoCG, we would like to take this opportunity to highlight the SDNPA's strategic cross-boundary priorities as a framework for future discussions. These are:

- Conserving and enhancing the **natural beauty, wildlife and cultural heritage** of the National Park and its setting;
- **Biodiversity restoration** at all scales and making nature bigger, better and more joined up;
- Mitigation and adaptation to **climate change**, including nature based solutions;
- **Sustainable travel** into, within and across the National Park;
- The **local economy** and jobs particularly in land management and the visitor economy;
- New **homes** including accommodation for Travellers, focusing on affordable homes for local communities; and
- Green and grey **infrastructure** serving communities in and around the National Park.

The SDNPA will continue to work closely and collaboratively with EHDC in relation to the above cross boundary priorities. We note of equal importance is that effective collaboration takes place with regards to enhancing the natural beauty of the area, especially within the setting of the SDNP. This is similarly the case with green infrastructure, wildlife corridors, and connecting people to the recreational opportunities in the SDNP in line with Purpose No.2 (see above). The South Downs Partnership Management Plan (PMP) is also a material consideration in this respect.

Given the above, we recommend additional text is included under “Duty to Cooperate” to recognise the need for a joint approach with the SDNPA, with regard to development and change within the setting of the SDNP, and reference to the South Downs PMP.

## **Overall Comments**

We have provided our overarching comments to the Draft East Hampshire Local Plan 2040 under the SDNPA’s strategic cross boundary priorities below. In addition, we have also provided further (more specific) comments in the table overleaf.

### **(I) Conserving and enhancing the natural beauty, wildlife and cultural heritage of the National Park and its setting**

The South Downs National Park (SDNP) has the highest status of protection in relation to conserving and enhancing landscape and scenic beauty. Indeed, the landscape is the foundation for all other defined [special qualities](#)<sup>1</sup> of the SDNP, including its setting, views, tranquillity, unspoilt places, dark night skies, and its distinctive towns and villages. The SDNP covers approx. 57% of East Hampshire District and a significant proportion of the remainder of the district is within the setting of the SDNP. Development within the setting of the SDNP must be sensitively located and designed to avoid or minimise any adverse impacts on the SDNP in line with NPPF Paragraph 182.

It is important to remember that the “setting” can be landscape, experiential, and visual. Development within East Hampshire can only conserve and enhance the SDNP and its setting if it is sympathetic to its historic landscape character and settlement pattern. In conjunction, development that is disproportionate in scale to existing towns and villages, or is located or designed in a way that conflicts with their character and settlement pattern, will be damaging to the SDNP and its setting. Any development proposals within the setting of the SDNP should be supported by landscape evidence necessary to inform design and capacity – i.e., a “landscape-led” design. Examples of such landscape evidence includes, but is not limited to:

- The South Downs Viewshed Analysis<sup>2</sup>; and
- The South Downs Landscape Character Assessment (LCA)<sup>3</sup>.

Landscape evidence will assist in helping to avoid or mitigate any potential adverse impacts on the SDNP. To achieve this, settlement expansions which knit into the existing settlement pattern, have an appropriate transition into the countryside, and have characteristic and meaningful mitigation (incl. landscape buffers), will help to reflect the countryside edge and a site’s role in the SDNP’s setting.

<sup>1</sup> The defined Special Qualities of the South Downs National Park:

<https://www.southdowns.gov.uk/our-history/why-are-we-a-national-park/sdnp-special-qualities/>

<sup>2</sup> South Downs Viewshed Analysis:

<https://www.southdowns.gov.uk/planning-policy/south-downs-local-plan/local-plan-evidence-base/evidence-and-supporting-documents/viewshed-analysis/>

<sup>3</sup> South Downs Landscape Character Assessment:

<https://www.southdowns.gov.uk/landscape-design-conservation/south-downs-landscape-character-assessment/>

The Draft Local Plan refers to the SDNP, its setting and its special qualities in several policies and explanatory texts. Although this is welcomed, it may be more robust to include an overarching policy that recognises the responsibilities incumbent upon relevant authorities to seek to further the National Park purposes. An overarching policy would reduce the need for repetition in other policies, whilst also providing an opportunity to highlight key considerations for applications on the boundary with, and in the wider setting of, the SDNP. These considerations include, but are not limited to:

- Landscape character impacts;
- Visual impacts (incl. views to and from the SDNP);
- Special qualities (incl. tranquillity and dark night skies);
- Biodiversity enhancement (incl. wildlife corridors); and
- Green Infrastructure (GI) links.

It would be ideal if a standalone policy was included in the emerging local plan, similar to **Policy DPI8** in the Adopted Mid Sussex Local Plan 2031<sup>4</sup>, or as proposed in emerging **Policy DPC5** in the Pre-Submission Mid Sussex Local Plan 2039. As an alternative, the emerging **Policy NBE10** in the Draft East Hampshire Local Plan 2040 could be expanded to incorporate the above.

It is considered that the strategic site of Neatham Down (ALT8) cannot be achieved at the capacities assumed whilst complying with the above principles. The proposed site for 1,000 homes is of a scale and location that would be visible from the SDNP, and is likely to have negative effects upon views, sky glow and tranquillity. The SDNPA requests that EHDC revisit this proposed strategic allocation and how it can meet the requirements to conserve and enhance the SDNP and its setting.

## **(2) Biodiversity restoration at all scales and making nature bigger, better and more joined up**

The district of East Hampshire has a wealth of wildlife habitats and diverse landscapes. However, nature does not stop at administrative boundaries. The varied landscapes of the South Downs National Park (SDNP) contribute to a range of ecosystem services. The condition of environmental and landscape features, and their management, is therefore essential to the continued function of ecosystem services and the benefits they provide. We would welcome opportunities to work together on initiatives to protect, conserve, and enhance our shared environment, including green infrastructure (GI) and biodiversity networks which connect, and cross between, both Local Planning Authority (LPA) areas.

The South Downs People And Nature Network (PANN)<sup>5</sup>, published in 2020, brings together a range of partner organisations, stakeholders, communities, and businesses to identify opportunities and areas, for natural capital investment in green infrastructure (GI) and biodiversity, for the benefits of both people and nature. In terms of East Hampshire, the PANN identifies the following Natural Capital Investment Areas (NCIAs) both inside and outside the SDNP:

- NCIA 2 – East Hants and Heathlands;
- NCIA 3 – South Hampshire; and
- NCIA 4 – Rother Catchments.

<sup>4</sup> Adopted Mid Sussex District Local Plan 2031:  
<https://www.midsussex.gov.uk/planning-building/mid-sussex-district-plan/>

<sup>5</sup> South Downs People and Nature Network (PANN):  
<https://www.southdowns.gov.uk/national-park-authority/our-work/partnership-management/people-and-nature-network-pann/the-people-and-nature-network-pann/>

We suggest that the NCIA's are referenced and mapped in **Chapter 5** as appropriate to help expand upon: **NBE2** (Biodiversity, geodiversity and nature conservation); **NBE3** (Biodiversity net gain); **NBE4** (Wealden Heaths European SPA and SAC sites); **Figure 5.4** (Blue and Green Infrastructure Strategic Opportunity Areas); **NBEI2** (Green and blue infrastructure); and **NBEI3** (Protection of Natural Resources).

### **(3) Mitigation and adaptation to climate change, including nature based solutions**

We support **Objectives B3-5** (and associated policies) to ensure that new development prioritises net zero, enables people to “live locally”, and considers the whole life carbon approach. In terms of **Policy CLIM4** (Renewable and low carbon energy), we recognise the need for renewable and low carbon energy schemes to help mitigate and tackle climate change. However, the delivery of such schemes within the setting of the SDNP has the potential to erode landscape and rural character (i.e., boundary security fences, lighting, and views etc.). As such, we welcome the inclusion of Criterion CLIM4.1(a) to ensure that energy proposals avoid any unacceptable impacts on landscape character, visual amenity, and other considerations, including any potential impacts on the South Downs National Park (SDNP) and its setting. We suggest that the policy and explanatory text is expanded to ensure that proposals are supported and informed by a Landscape Visual Impact Assessment (LVIA).

### **(4) Sustainable travel into, within and across the National Park**

The proposed thematic policies and allocations present opportunities to link communities with natural green spaces and other destinations in the SDNP, benefitting health and wellbeing. In line with the SDNPA Cycling and Walking Strategy, we mainly seek opportunities to provide connections via new or improved routes for walking, cycling and horse riding. In several places these routes already exist or partially exist and the proposed allocations could present opportunities to fill in missing links or create new connections. The benefits include the potential to reduce car traffic by providing alternative options for residents to access the SDNP. With the above in mind, we would encourage:

- The creation of new – and the safeguarding, enhancement and connection of existing - cycling, equestrian and pedestrian routes into the SDNP;
- The protection and enhancement of historic rural roads that form part of the setting of the SDNP, including a reference in the supporting text to “Roads in the South Downs”<sup>6</sup>;
- The consideration that small low-use residential roads in dark sky zones do not automatically receive street lighting; and
- The safeguarding of the Shipwrights Way and disused railway lines from future development, and the facilitation of their future use and enhancement for non-motorised use (NMUs).

In terms of the latter, South Downs Local Plan (SDLP) **Policy SD20** identifies and safeguards future NMU routes which are considered essential for the effective delivery of sustainable routes into and through the SDNP. In terms of East Hampshire, the routes which cross both LPA areas are:

- Bordon to Bentley; and
- Wickham to Alton (Meon Valley Trail).

We request that the above routes are safeguarded in the East Hampshire Local Plan 2040 and that policy criteria is included to ensure that development delivers (either whole or in part) these safeguarded routes. This could include physical delivery or a financial contribution as appropriate.

<sup>6</sup> Roads in the South Downs:

<https://www.southdowns.gov.uk/landscape-design-conservation/design-in-the-south-downs/guidance/roads-in-the-south-downs/>

### **(5) The local economy and jobs particularly in land management and visitor economy**

There are strong synergies with National Park Purpose No.2 and the need to promote and develop the local economy and sustainable tourism. There are a number of towns and villages in the district which are identified as gateways to the South Downs National Park (SDNP). We acknowledge the potential for the increased role of tourism and visitor-related development within the setting of the SDNP. As such, we would welcome measures to ensure that tourism benefits towns and villages, providing that any tourism-related development is sensitivity designed when in the setting of the SDNP. In addition, and in connection with Sub-Section (4) above, we would encourage the safeguarding, enhancement and connection of existing – and the creation of new - cycling, equestrian, and pedestrian links from towns, villages and tourism accommodation into the SDNP.

### **(6) New homes including accommodation for Travellers, focusing on affordable homes for local communities**

The SDNPA is currently at the very early, evidence gathering stage of its Local Plan Review (LPR). In November 2023, the SDNPA published its Housing & Economic Development Needs Assessment (HEDNA). The HEDNA has calculated an unconstrained or “policy-off” housing need of 6,300 homes across the whole of the South Downs National Park (SDNP) between 2024 and 2042; this is the equivalent of 350 dwellings per annum (dpa). Given the early stage of plan making, the SDNPA is currently unable to confirm how much of the identified housing need can be met across the SDNP, and how much of this need could be apportioned to the East Hampshire Area of the SDNP. The SDNPA and EHDC will continue to work together to consider whether, and how, any identified unmet needs can be met. In the meantime, the proposed housing requirement of 9,082 dwellings over the plan period (or 478 dpa) in **Policy SI** (Spatial Strategy) is supported. This will ensure that the locally assessed housing need for the area of the district outside the SDNP is met (as per the Standard Method), whilst also providing for some of the anticipated unmet need of the SDNP. It is understood that EHDC will seek to adjust this number in the next iteration of the emerging local plan once the South Downs Local Plan Review (LPR) has further progressed.

The proposed housing requirement of 9,082 dwellings comprises 6,225 dwellings from existing commitments (incl. completions and permissions) and windfall, leaving a shortfall of 2,857 dwellings to be identified and allocated in the Draft Local Plan. Despite the above, **Policy HI** (Housing Strategy) states that provision has been made for about 3,500 dwellings, which is approx. 640 dwellings more than the calculated shortfall of 2,857 dwellings. Paragraphs 9.19 to 9.22 further explain that this uplift / flexibility will provide a 10-15% buffer in the instance that allocated sites do not come forward, whilst also addressing potential unmet housing needs from the wider sub-region of South Hampshire.

Although EHDC’s ambition to assist the sub-region is noted and applauded, we have concerns over the strategic allocation at **Neatham Down (Policy ALT8)** and would advise that its development quantum is reduced – see more specific comments in the table overleaf. In conjunction, it is important to remember that NPPF Paragraph 61 sets out that the outcome of the Standard Method is an “advisory starting point for establishing a housing requirement”. Furthermore, NPPF Paragraph 11b(i) and NPPF Footnote 7 explain that strategic policies should provide for objectively assessed needs (OAN) for housing and other uses unless the application of other policies in the NPPF that protect areas or assets of particular importance (incl. National Parks, see NPPF Paragraph 182) provides a strong reason for restricting the overall scale, type or distribution of development.

As for the needs of gypsies, travellers and travelling showpeople accommodation, the East Hampshire Gypsy & Traveller Accommodation Assessment (GTAA) [March 2020] identifies a need of 7no. travelling showpeople plots in the East Hampshire Area inside the SDNP, along with a need of 62no. traveller pitches and 46no. travelling showpeople plots in the East Hampshire Area outside of the SDNP. As set out in the most recent Statement of Common Ground (SoCG) [January 2024]: the

South Downs Local Plan Review (LPR) is at the early, evidence gathering stage; and the suitability of any proposal in the SDNP and compliance with the relevant policies of the South Downs Local Plan (SDLP) are the key determining factors for any planning application. Moreover, the meeting of unmet need from the East Hampshire Area outside of the SDNP is unlikely to carry material weight given that the Planning Practice Guidance (PPG) explains that National Parks are not suitable locations for meeting unmet need from other LPA areas. That said, should traveller pitches be permitted and completed in the East Hampshire Area inside the SDNP, consideration will be given on a case-by-case basis as to whether they could count towards the unmet need in the East Hampshire Area outside of the SDNP. This is until such a time that a new GTAA is prepared, and/or the SoCG is updated to reflect any changing position.

### **(7) Green and grey infrastructure serving communities in and around the National Park**

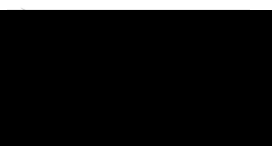
There is potential for significant impact on the roads running through the SDNP from additional traffic arising from proposed development allocations. This includes both roads which form part of the transition between the built up areas of East Hampshire and the SDNP, as well as the rural roads and villages within the SDNP itself. It is important that a whole plan transport assessment is made available as soon as possible, which quantifies likely changes in traffic flow, assesses their impacts, and puts forward appropriate mitigation measures. Particular regard should be had to any potential impact on the SDNP, and so it is recommended that reference is made to “Roads in the South Downs”<sup>7</sup> in undertaking this work and any relevant local plan policies. Finally, we would welcome the opportunity to work together in gathering evidence on this matter to help inform both emerging local plans.

### **Summary**

We believe the Draft East Hampshire Local Plan 2040 overall to be a robustly prepared document which sets a clear strategy going forward. However, the SDNPA has a number of concerns, as set out above and in the table overleaf, which we consider should be addressed in full in order to make sure that the Pre-submission version of the East Hampshire Local Plan 2040 is sound. We can confirm that we are committed to continued liaison and joint working towards achieving effective outcomes in this respect.

We would like to wish you well in the progression of your Local Plan. If you have any questions on the content of this letter, please do not hesitate to contact me.

Yours faithfully



Planning Policy Manager  
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<sup>7</sup> Roads in the South Downs:

<https://www.southdowns.gov.uk/landscape-design-conservation/design-in-the-south-downs/guidance/roads-in-the-south-downs/>

### SDNPA further response to the Draft (Regulation 18) East Hampshire Local Plan 2040

The South Down National Park Authority's (SDNPA) overarching comments are set out in the letter above, whilst comments which either supplement the above, and/or are more specific, are set out in the table below. The comments are individual officers' views under the Delegated Powers of the SDNPA.

Ref	SDNPA Comment / Recommendation	SDNPA Reason(s)
General	Please incl. numbers, captions, locations, and sources for all photos.	Ease of reading and understanding.
<b>Part A – Planning for the Future of East Hampshire Chapter 01 – Introduction &amp; Background</b>		
Figure 1.2, p17	Please include the South Downs National Park (SDNP) in the key.	Ease of reading and understanding.
<b>Part A – Planning for the Future of East Hampshire Chapter 02 – Vision &amp; Objectives</b>		
Objective B1, p27	The objective is supported. We suggest specific reference is made to the South Downs National Park (SDNP) in recognition of: its landscape and scenic beauty; its special qualities; its setting; and its importance as a resource for residents to access and enjoy. The latter connects with health and wellbeing objectives.	National Park Purpose Nos 1 & 2; and NPPF Paragraph 182.
Objective C3, p28	<b>Please amend to:</b> Maintain and enhance the built and natural environments to support habitats and their connectivity <b>across the district and its boundaries, and</b> help the public to access <b>open spaces and the South Downs National Park.</b>	National Park Purpose No.2.

Ref	SDNPA Comment / Recommendation	SDNPA Reason(s)
<b>Part A – Planning for the Future of East Hampshire</b> <b>03 – Managing Future Development</b>		
Paragraphs 3.6 to 3.8, p32; Paragraphs 3.9 to 3.12, p33; Policy SI.1, p38; Paragraph 9.11, p216; and Figure 9.5, p217.	The SDNPA published its Housing & Economic Development Needs Assessment (HEDNA) in November 2023. This calculated an unconstrained or “policy-off” housing need figure of 6,300 homes across the whole of the SDNP between 2024 and 2042; this is the equivalent of 350 dwellings per annum (dpa). The SDNPA is at the very early, evidence gathering stage of its Local Plan Review (LPR). As a result, the SDNPA is currently unable to confirm how much of the identified housing need can be met across the SDNP, and how much of this need could be apportioned to the East Hampshire Area of the SDNP.	This has been set out in Statement of Common Ground (SoCG) signed between both LPAs on 18 January 2024. The apportionment of the district’s housing need between the two LPAs will need to be discussed further as both LPAs progress with their emerging local plans.
Paragraph 3.14, p34; and Policy SI.3, p38.	The paragraph states that there is an identified need for 66no. gypsy and traveller pitches, and 47no. travelling showpeople plots in the EHDC LPA area up to 2036. This is greater than the 62no. and 46no. recorded respectively in the recently signed Statement of Common Ground (SoCG) between both LPAs.	Clarification required.
<b>Part B – Greener Places</b> <b>04 – Responding to the Climate Emergency</b>		
Policy CLIM4, p73	Criterion CLIM4.1(a) is supported, but would benefit from rewording to make it clear that proposals: are supported and informed by a Landscape Visual Impact Assessment (LVIA); and should be sensitively located and designed to avoid or minimise any adverse impacts on the SDNP.	National Park Purpose No.1; NPPF Paragraph 182; and Ease of understanding.
Paragraph 4.51, p74; and Paragraph 4.57, p75	Please refer to the SDNP and its setting, and make it clear that proposals in the setting of the SDNP should be sensitively located and designed to avoid or minimise any adverse impacts on the SDNP.	National Park Purpose No.1; and NPPF Paragraph 182.



Ref	SDNPA Comment / Recommendation	SDNPA Reason(s)
Paragraph 4.59, p76	The explanatory text explains that wind energy developments should avoid unacceptable impacts on the setting / views to and from the SDNP. The above, and the rest of the text, is supported.	n/a
Policy CLIM5.2(b), p80	The policy and its criterion are supported. There is an opportunity to expand the policy wording to ensure that green and blue infrastructure connects to the wider habitat network in the district and over its boundaries into the SDNP.	SDNPA cross-boundary priorities 2 & 7.
<b>Part B – Greener Places Chapter 05 – Safeguarding our Natural and Built Environment</b>		
Table 5.1, p92	What about National Nature Reserves (NNRs), Local Wildlife Sites (LWS) and Local Geological Sites etc.?	Ease of reading and understanding.
Policy NBE2, p93; and Paragraph 5.17, p94.	There is a typo in NBE2.1(c) and there is an opportunity to expand NBE2.1(e) to encourage (new and enhancement of existing) linkages between the EHDC and SDNPA LPA areas, including the South Downs PANN & NCIA's – see covering letter. Alternatively, the above could be included within the GI-related policies – i.e., emerging Policy NBE12.	SDNPA cross-boundary priorities 2 & 7.
Policy NBE4, p101.	We welcome the policy and continued joint working as part of the “Wealden Heaths Phase II Special Protection Area” cross boundary working group.	n/a

Ref	SDNPA Comment / Recommendation	SDNPA Reason(s)
<p>Policy NBE10, p121; Paragraph 5.73, p120; Paragraph 5.74, p120; and Paragraph 5.76, p122.</p>	<p>We support NBE10.2(d) to ensure that there is no significant impact to the South Downs National Park and its setting. However, it may be more robust to include an overarching policy to development in the setting of the SDNP so to recognise the responsibilities incumbent upon relevant authorities (incl. EHDC) to seek to further the National Park purposes. An overarching policy would reduce the need for repetition in other policies, whilst also providing an opportunity to highlight key considerations for applications on the boundary with, and in the wider setting of, the SDNP. These considerations include, but are not limited to:</p> <ul style="list-style-type: none"> <li>• Landscape character impacts;</li> <li>• Visual impacts (incl. views to and from the SDNP);</li> <li>• Special qualities (incl. tranquillity and dark night skies);</li> <li>• Biodiversity enhancement (incl. wildlife corridors); and</li> <li>• Green Infrastructure (GI) links.</li> </ul> <p>It would be ideal if a standalone policy was included in the emerging local plan, similar to <b>Policy DPI18</b> in the Adopted Mid Sussex Local Plan 2031, or emerging <b>Policy DPC5</b> in the Pre-Submission Mid Sussex Local Plan 2039. However, as an alternative, emerging Policy NBE10 could be expanded to incorporate the above. If the expansion of Policy NBE10 is preferred by EHDC, then the explanatory text should reference the:</p> <ul style="list-style-type: none"> <li>• National Park Purposes and the duty to seek to further these;</li> <li>• Defined special qualities of the SDNP<sup>8</sup>; and</li> <li>• South Downs Landscape Character Assessment (LCA) 2020<sup>9</sup>.</li> </ul>	<p>National Parks &amp; Access to the Countryside Act 1949; Section 245 of Levelling Up &amp; Regeneration Act (LURA) 2023; National Park Purposes Nos 1 &amp; 2; and NPPF Paragraph 182.</p>

<sup>8</sup> South Downs National Park Special Qualities: <https://www.southdowns.gov.uk/our-history/why-are-we-a-national-park/sdnp-special-qualities/>

<sup>9</sup> South Downs Landscape Character Assessment (LCA) 2020: <https://www.southdowns.gov.uk/landscape-design-conservation/south-downs-landscape-character-assessment/>

Ref	SDNPA Comment / Recommendation	SDNPA Reason(s)
Policy NBE12, p128	There is an opportunity to expand the policy to encourage (new and enhancement of existing) linkages between the EHDC and SDNPA LPA areas, including the South Downs PANN & NCIA's – see covering letter.	SDNPA cross-boundary priorities 2 & 7.
Policy NBE13, p131	Please expand to include sensitive receptors beyond the EHDC LPA area.	Impacts can occur across LPA boundaries and so this should be recognised.
Paragraph 5.102, p132	The soft sand and potential silica sand resources at Whitehill & Bordon are included in the mineral safeguarding area (MSA) and mineral consultation area (MCA) - see Policy 15 [Safeguarding – mineral resources] and Appendix A [Site Allocations] – of the emerging Hampshire Minerals & Waste Plan (HMWP) 2040. Although the MSA and MCA extend over much of East Hampshire, the above is particularly relevant to highlight given the proposed level of redevelopment at Whitehill & Bordon and the opportunity this could provide for prior extraction.	Land-won soft sand and silica sand are important aggregates which cannot be substituted by other minerals. In particular, soft sand is used in the production of high-quality building sand for mortar, whilst silica sand is used for a range of specialist and high value industrial applications (i.e., glass manufacture, foundry casting, ceramics, chemical manufacture, water filtration, recreation uses, horticulture uses, and root zone products etc.).
<b>Part B – Greener Places</b> <b>Chapter 06 – Desirable Places</b>		
Policy DES2, p155	There is an opportunity to reference the landscape character and features of the SDNP, and the need for development in the SDNP's setting to avoid or minimise adverse impacts.	National Park Purpose No.1; and NPPF Paragraph 182.

Ref	SDNPA Comment / Recommendation	SDNPA Reason(s)
<b>Part C – Vibrant Communities</b> <b>Chapter 07 – Enabling Communities to Live Well</b>		
Policy HWC1, p175	There is an opportunity to expand HWC1.1(c) to enhance and facilitate access to the SDNP (incl. its active travel network, destinations, features and GI network).	National Park Purpose No.2; and SDNPA cross-boundary priority 6.
<b>Part C – Vibrant Communities</b> <b>Chapter 08 – Delivering Green Connections</b>		
Policy DGC2, p192	We support Criterion DGC2.2(f) in relation to protecting or enhancing the character of historic rural roads, particularly within the setting of the South Downs National Park. The policy and its explanatory text could be expanded further to reference the “Roads in the South Downs” <sup>10</sup> and the opportunity to enhance active travel connections across LPA areas.	SDNPA cross-boundary priorities 4 & 7.
Paragraph 8.40, p194	We support EHDC’s commitment to continuing to work with adjoining LPAs to address transport and accessibility issues.	n/a
<b>Part C – Vibrant Communities</b> <b>Chapter 09 – Homes for All</b>		
Paragraph 9.4, p210 (1 <sup>st</sup> Bullet Point)	The SoCG (January 2024) between the both Authorities clarifies that it is for the SDNPA to identify a local housing need figure for the SDNP through its plan-making process.	n/a

<sup>10</sup> Roads in the South Downs: <https://www.southdowns.gov.uk/landscape-design-conservation/design-in-the-south-downs/guidance/roads-in-the-south-downs/>

Ref	SDNPA Comment / Recommendation	SDNPA Reason(s)
Figure 9.1, p211; and Figure 9.8, p227.	The SDNPA is preparing its own data on population change, population profiles, housing need and affordability need etc. to inform the South Downs Local Plan Review (LPR). It may appear confusing to applicants and residents if you are providing data on the SDNP Area of East Hampshire. In addition, the data may be outdated / superseded by the SDNPA's own data as the South Downs LPR progresses. We request that the data referring to the SDNP area of East Hampshire District is removed.	Ease of reading and understanding; and To be captured in South Downs LPR.
Paragraph 9.16, p218	Please correct typo – “Whilst” not “Whist”.	Typo.
Policy H4, p232	The policy should also set out how EHDC would consider applications for RES in their Local Plan Area where the related settlement is in the SDNP.	NPPF Paragraph 182; and Clarification required.
Paragraph 9.72, p234	Is the need for 830no. housing units with support (sheltered / retirement housing) and 760no. housing units with care (extra care) for the whole district or just EHDC's Local Planning Authority (LPA) area?	Clarification required.
Paragraph 9.97, p242	The paragraph explains that Policy H8 sets out the number of gypsy, traveller, and travelling showpeople pitches and plots required over the plan period, along with site allocations for new pitches and plots. However, Policy H8 only safeguards land with existing planning permission for permanent gypsy, traveller and travelling showpeople accommodation.	Clarification required.

Ref	SDNPA Comment / Recommendation	SDNPA Reason(s)
<b>Part C – Vibrant Communities Chapter 10 – Supporting the Local Economy</b>		
Paragraph 10.33, p258	Is the 28.2ha provision for East Hampshire District as a whole, or just for the EHDC Local Plan Area?	Clarification required.
Policy E3, p261	Please include a reference to the setting of the South Downs National Park (SDNP) in the first bullet point of Criterion E3.1.	NPPF Paragraph 182.
Paragraph 10.49, p263	The South Downs National Park (SDNP) includes 57% of the district, and so it is more than just “in close proximity to the authority”.	Factual correction.
Policy E4, p264	We support Criterion E4.2(b). We suggest that the criterion is expanded to explain that proposals should provide opportunities for visitors to increase their awareness, understanding, and enjoyment of the special qualities of the South Downs National Park (SDNP). We recommend that reference is made to the <a href="#">South Downs Tourism Strategy 2015-20</a> <sup>11</sup> . This seeks to work with a range of partners in enabling enjoyment of the area, and guide the tourism activities of the SDNPA. It also identifies delivery tools to govern our working relationships with partners.	National Park Purpose No. 2; and Alignment with SDLP Policy SD23.

<sup>11</sup> South Downs Tourism Strategy 2015-20: <https://www.southdowns.gov.uk/wp-content/uploads/2017/06/Sustainable-Tourism-Strategy-2015-20.pdf>

Ref	SDNPA Comment / Recommendation	SDNPA Reason(s)
Paragraph 10.57, p265	<p><b>Please amend paragraph to:</b> Where proposals are in the <b>vicinity setting</b> of the South Downs National Park, the Local Planning Authority will endeavor to promote sustainable tourism to conserve and enhance the natural beauty, wildlife and cultural heritage of <del>the Local Plan Area East Hampshire and the South Downs National Park.</del></p>	National Park Purpose No.2; and NPPF Paragraph 182.

Ref	SDNPA Comment / Recommendation	SDNPA Reason(s)
<b>Part D – Development Management Policies and Site Allocations</b> <b>Chapter 11 – Development Management Policies</b>		
Policy DM12, p300	<p>We support Policy DM12. It is recommended that the policy is strengthened in line with the wording and approach of SDLP Policy SD8 (as appropriate). The policy first needs to set out that development must conserve and enhance the intrinsic quality of the dark night skies, and that development must demonstrate that all opportunities to reduce light pollution have been taken in order to ensure that the measured and observed dark sky quality is not negatively affected. As a starter, the installation of external lighting should be avoided, and buildings should be designed to reduce the impact of light spill from internal lighting. However, where lighting is necessary to ensure safety of occupants/visitors, a statement should be required to justify why the lighting is required for its intended use, and that every reasonable effort has been made to mitigate skyglow and light intrusions. The statement should be proportionate to the size and likely impacts of development. In some instances, a computer calculation may be required to indicate luminance, uniformity, horizontal values of overspill beyond property lines, and vertical luminance values of light intrusion of adjacent property windows. Notwithstanding the above, any required mitigation measures will be determined on a case-by-case basis but, in general, such measures should include, but not be limited to; replacing existing lighting; reducing luminance; directing lighting downwards whilst preventing upward, sideways and outward spillage; curfews or automatic timers; proximity “PIR” sensors; ensuring the colour and intensity of lighting is appropriate for wildlife and the wider setting; providing different surface types to reduce the amount of reflectivity; ensuring the design and quality of fenestration (incl. glazing) minimises light glare, glow, transmittance, and trespass; and/or screening or shielding to reduce the impact of reflectively.</p>	<p>The policy should align with Policy SD8 in the <a href="#">Adopted South Downs Local Plan (SDLP)</a>. This will provide clarity and continuity for agents / developers who operate across both LPA areas. Further guidance on the dark night skies can be found in the SDNPA’s <a href="#">Dark Skies Technical Advice Notes (TAN)</a>.</p>



Ref	SDNPA Comment / Recommendation	SDNPA Reason(s)
Policy DM13, p302	<p>Policy SD54 in the Adopted South Downs Local Plan (SDLP) is a “human health” air quality focused policy. Emerging Policy DM13 appears to focus on vehicle emissions, but other pollutants – such as dust from construction and employment uses – also contribute to air pollution. Finally, emerging Policy NBE2 addresses harm to nature conservation designations.</p> <p>It is requested that emerging Policy DM13 and its supporting text is expanded to recognise that there are other sources of air pollution beyond vehicle emissions, and that air quality is also important for biodiversity and nature conservation designations. In terms of the latter, cross reference to emerging Policy NBE2 would be helpful.</p>	The policy needs to capture more than just vehicle emissions, whilst also capturing potential effects on environmental designations.
Policy DM14, p304	We support the reference to historic, landscape, and/or cultural relation.	National Park Purposes Nos 1 & 2; and National Park Special Qualities.
Paragraph 11.100, p306; and Paragraph 11.104, p307	The paragraphs allude to a “proportion” of development providing custom and self-build (CSB) housing; however, no reference to this is made in the actual policy wording, and no proportion figure (either number or percentage) is provided. Is it on a case-by-case basis?	Clarification required.
Policy DM22, p322	We support Criterion DM22.1(f) but please reference Policy DM12.	n/a

Ref	SDNPA Comment / Recommendation	SDNPA Reason(s)
<b>Part D – Development Management Policies and Site Allocations</b> <b>12 – Site Allocations</b>		
Understanding the Site Proposals (p333)	It is understood that the proposed site allocations of the Draft Local Plan have not been confirmed, and that EHDC has taken the decision not to propose policy criteria at this earlier stage of plan making. We have provided general comments on sites (as appropriate) below and reserve the right to provide detailed comments on emerging policy criteria at the Regulation 19 public consultation.	n/a
Relationship with the Alton Neighbourhood Plan (p338)	The Alton Neighbourhood Plan housing requirement of 700 homes is noted, and we will provide comments on the emerging Alton Neighbourhood Plan Review when it is subject to public consultation. As for the allocations put forward in this Draft Local Plan, we have provided our comments below.	n/a
<b>ALT5 –</b> Land at Travis Perkins	The site is in the setting of the SDNP and will require policy criteria to ensure that the design of development is landscape-led, and that any potential adverse impacts on the SDNP are avoided or mitigated. This could include, but is not limited to, landscape character, views, tranquility and dark night skies.	NPPF Paragraph 182.

Ref	SDNPA Comment / Recommendation	SDNPA Reason(s)
<p><b>ALT8 –</b> Neatham Down</p>	<p>The site was previously proposed for a range of uses, including 600 new homes. The latest proposal is for 1000 homes, 6 travelling showpeople plots, commercial, education and community uses, and green infrastructure.</p> <p>The site is in the setting of the SDNP and will require policy criteria to ensure that the design of development is landscape-led, and that any potential adverse impacts on the SDNP are avoided or mitigated. This could include, but is not limited to, landscape character, views, tranquility and dark night skies. It is important to note that any potential mitigation should not be solely reliant on screening. In order to achieve a landscape-led approach, with the associated necessary evidence, development must respond to topography/contours, settlement pattern, nearby built form, and the role the site in the SDNP’s setting.</p> <p>Notwithstanding the general comments above, the site is not considered to be well related to the built up area of Alton. Development would extend the built form over the A31 and encroach into the unsettled, rural, transitional landscape between Alton and the SDNP. There is potential for adverse visual and landscape impacts – along with potential for long-distance views of the SDNP and Hangers Way. In particular, views will need to be checked from King John’s Hill and other SDNP locations. Given the above, we do not consider that the proposed developable area and development quantum can be achieved whilst also complying with the principles set out in SDNPA cross-boundary priority 1 – see covering letter. Indeed, the scale and location of development would be visible from the SDNP and is likely to result in negative impacts on views, sky glow, and tranquility. If the proposed allocation is taken forward to Reg19 then we request that the site and its potential development is revisited so to consider how it can conserve and enhance the SDNP and its setting. As a start, we would expect to see the developable area and development quantum reduced and contained to the valley slopes (facing Alton) in the western area of the site. Proposed built development should not breach the upper limit of the rising valley topography.</p>	<p>NPPF Paragraph 182.</p> <p>The SDNPA has no comment on the principle of development, but has concerns over the development quantum, scale, and extent of the site, especially in the eastern area which is in the setting of the SDNP. Given that the Draft Local Plan is making provision for 3,500 dwellings (rather than the required 2,857 dwellings to meet OAN), the SDNPA request that:</p> <ul style="list-style-type: none"> <li>• The developable area and development quantum is reduced; and</li> <li>• Any forthcoming allocation maps and considers key views points to and from the SDNP; and</li> <li>• Any forthcoming allocation includes a requirement for development to be informed by a landscape-led masterplan.</li> </ul>

Ref	SDNPA Comment / Recommendation	SDNPA Reason(s)
<p><b>W&amp;B1</b> – Town Centre Intensification.</p> <p><b>W&amp;B2</b> – Former Bordon Garrison</p> <p><b>W&amp;B3</b> – BOSC Residential Expansion</p> <p><b>W&amp;B4</b> – Louisburg Expansion.</p> <p><b>W&amp;B5</b> – Louisburg Expansion</p> <p><b>W&amp;B6</b> – Lion Court, Farnham Rd</p> <p><b>W&amp;B7</b> – Hollywater &amp; Mill Chase Rds</p>	<p>Although we support the reuse and <u>appropriate</u> intensification of previously developed land (PDL) subject to final building heights [<u>emphasis added</u>], we have concerns regarding the amount of proposed tree loss and the individual and cumulative impacts on surrounding habitat – incl. the SPA.</p> <p>Given the scale of proposed additional development in Whitehill &amp; Bordon, the Draft Local Plan should require development to deliver both multifunctional green infrastructure (GI) and the Bentley-Bordon old railway line for non-motorised use (NMU). The part of the line in the SDNP is safeguarded for NMU delivery under SDLP Policy SD20. The opportunity to deliver the safeguarded route across both LPA Areas should be discussed further as a cross boundary matter, and should be included in any future allocation and policy criteria.</p> <p>Notwithstanding the above, we are concerned that significant additional traffic will arise from these sites (both individually and cumulatively), and that this additional local traffic will displace through traffic. This could have potential negative impacts on the SDNP and its setting. Significant increases in traffic in SDNP villages (esp. Binsted, Greatham, and Selborne etc.) could be detrimental to defined village characters. We would expect the forthcoming transport assessment to address the above concern. This should include: a re-assessment of the capacity of the relief road (A325 Templars Way / Louisburg Avenue) in order to accommodate additional traffic; and for mitigation measures put forward to be fully reflected in any final allocation policy.</p>	<p>NPPF Paragraph 182; Wealden Heaths Phase II SPA; Policy SD20 Safeguarded Routes; and Roads in the South Downs.</p>

Ref	SDNPA Comment / Recommendation	SDNPA Reason(s)
<p><b>W&amp;B1</b> – Town Centre Intensification.</p> <p><b>W&amp;B2</b> – Former Bordon Garrison</p> <p><b>W&amp;B3</b> – BOSC Residential Expansion</p> <p><b>W&amp;B4</b> – Louisburg Expansion.</p> <p><b>W&amp;B5</b> – Louisburg Expansion</p> <p><b>W&amp;B6</b> – Lion Court, Farnham Rd</p> <p><b>W&amp;B7</b> – Hollywater &amp; Mill Chase Rds</p>	<p>The proposed allocations are within 5km of the Wealden Heaths Phase II SPA. Although we support the reuse and <u>appropriate</u> intensification of previously developed land (PDL) subject to final building heights [<u>emphasis added</u>], we have concerns regarding the amount of proposed tree loss and the individual and cumulative impacts on surrounding habitat – incl. the SPA. It will be essential that any allocations will be able to sufficiently avoid or mitigate any potential harm to the SPA, including protection (and no undermining) of any existing Strategic Alternative Natural Greenspace (SANG). In terms of new SANG provision, the Draft Local Plan does not propose specific sites for new SANG, but instead identifies SANG options in Figure 12.8. There is proposed residential expansion (W&amp;B3) and possible additional SANG provision within close proximity (within 1km) of Shortheath Common SSSI and SAC within the SDNP. This has some existing use and pressure for recreation. The impact on this will need to be assessed to avoid adverse impacts.</p> <p>As we understand, Hogmoor Inclosure SANG has become a popular destination, and so this should be considered in the context of needs arising from new allocations and the proposed intensification. An assessment / appraisal of SANG options will need to be prepared to ensure that any potentially adverse impact to the SPA is sufficiently avoided or mitigated. One option could be for SANG / Off-lead zones adjacent to (but not in) the SPA (i.e., BOSC Village), but such areas would need to be investigated further and would need to be large enough to properly exercise a dog. Examples can be seen at Buckler’s Forest (Bracknell) (<a href="https://thelandtrust.org.uk/space/bucklers-forest/">https://thelandtrust.org.uk/space/bucklers-forest/</a>) and Canford Park SANG (<a href="https://www.canfordparksang.co.uk/">https://www.canfordparksang.co.uk/</a>).</p>	<p>NPPF Paragraph 182; and Wealden Heaths Phase II SPA.</p>

Ref	SDNPA Comment / Recommendation	SDNPA Reason(s)
<b>HDN2</b> – Land south of Five Heads Rd <b>HDN3</b> – Land north of Chalk Hill Rd <b>CTN1</b> – Land at Parsonage Farm <b>CTN2</b> – Land at the Dairy	<p>The sites are in the setting of the SDNP and will require policy criteria to ensure that the design of development is landscape-led, and that any potential adverse impacts on the SDNP are avoided or mitigated. This could include, but is not limited to: landscape character; views; tranquility; and dark night skies. It is important to note that any potential mitigation should not be solely reliant on screening. In order to achieve a landscape-led approach, with the associated necessary evidence, development must respond to settlement pattern, adjacent built form, and the role each site has as part of the setting of the SDNP.</p>	<p>NPPF Paragraph 182.</p>
<b>LIPI</b> – Land north of Haslemere Rd <b>LIP3</b> – Land at Chiltley Farm	<p>The sites are within 5km of the Wealden Heaths Phase II SPA and in the setting of the SDNP. In terms of the former, it will be essential that any allocations will be able to sufficiently avoid or mitigate any potential direct or indirect harm to the SPA. As for the latter, the sites are in close proximity to the SDNP boundary and may be visible from higher ground in the SDNP. Any future allocation policies will require criteria to ensure that the design of development is landscape-led, and that any potential adverse impacts on the SDNP are avoided or mitigated. This could include, but is not limited to: landscape character; views; tranquility; and dark night skies. It is important to note that any potential mitigation should not be solely reliant on screening. In order to achieve a landscape-led approach, with the associated necessary evidence, development must respond to the settlement pattern of Liphook, and its role as part of the setting of the SDNP.</p>	<p>NPPF Paragraph 182.</p>
<b>HOPI</b> – Land north of Fullers Rd	<p>The site is in the setting of the SDNP and will require policy criteria to ensure that the design of development is landscape-led, and that any potential adverse impacts on the SDNP are avoided or mitigated. This could include, but is not limited to: landscape character; views; tranquility; and dark night skies.</p>	<p>NPPF Paragraph 182.</p>

Ref	SDNPA Comment / Recommendation	SDNPA Reason(s)
<p><b>CFD1</b> – Clanfield County Farm</p> <p><b>CFD2</b> – Land at Drift Road</p>	<p>The sites are both in the setting of the SDNP and on sloping land which face towards the SDNP. The sites will require policy criteria to ensure that the design of development is landscape-led, and that any potential adverse impacts on the SDNP are avoided or mitigated. This could include, but is not limited to: landscape character; views; tranquility; and dark night skies. It is important to note that any potential mitigation should not be solely reliant on screening. In order to achieve a landscape-led approach, with the associated necessary evidence, development must respond to settlement pattern, adjacent built form, and the role each site has as part of the setting of the SDNP. As part of the above, any allocations will need to include policy criteria to ensure that the:</p> <ul style="list-style-type: none"> <li>• Views to/from the SDNP, PRoW and other viewpoints are fully considered;</li> <li>• Design and layout responds to the location in the SDNP's setting; and</li> <li>• Lighting is appropriately designed given the proximity to the dark night skies core and Clanfield Observatory.</li> </ul>	<p>South Downs International Dark Sky Reserve (IDSR); and NPPF Paragraph 182.</p>

Ref	SDNPA Comment / Recommendation	SDNPA Reason(s)
<b>I3 - Appendices</b>		
Appendix B - Glossary	<p><b><u>Please amend to:</u></b></p> <p><b>National Park:</b> The English National Parks are recognised as landscapes of exceptional beauty which have been fashioned by nature and the communities which live in them. The National Parks &amp; Access to the Countryside Act 1949 (the 1949 Act) enabled the creation of the National Parks to ensure that the nation's most beautiful and unique landscapes will continue to be protected for the future. The statutory purposes of National Parks are: to conserve and enhance their natural beauty, wildlife and cultural heritage of the area; and to promote opportunities for the public understanding and enjoyment of their special qualities of the National Park by the public.</p>	Factual corrections; Omitted info / explanations; and Ease and understanding of reading.
Appendix B - Glossary	<p><b><u>Please add in the following to the Glossary:</u></b></p> <p><b>South Downs National Park (SDNP):</b> The South Downs was designated as a National Park on 31 March 2010 and includes 1,600 square kilometres (sqkm) of England's most valued lowland landscape.</p> <p><b>South Downs National Park Authority (SDNPA):</b> The Local Planning Authority (LPA) established on 01 April 2011 for the South Downs National Park (SDNP).</p>	Omitted info / explanations; and Ease and understanding of reading.



**RE: Local Plan consultation - deadline extended**

Water Resources &lt;wre@southeastwater.co.uk&gt;

Fri 08/03/2024 12:25

To:EHDC - Local Plan &lt;LocalPlan@easthants.gov.uk&gt;; [REDACTED]&gt;

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

Dear [REDACTED]

Thank you for your recent email in relation to the East Hampshire District Council Regulation 18 draft Local Plan update.

Growth Forecasts

As part of the development of our Water Resources Management Plan 2024 we worked in collaboration Edge Analytics, a specialist demographic forecasting consultancy, to develop property and population forecasts at a water resource zone level. Edge Analytics maintain a comprehensive geographical database of detailed data from all local plans produced by local authorities across the UK as shown in the below graphs.

Our recently published revised draft WRMP considers the most recent housing trajectory figures from East Hampshire District Council, available at the time we developed our plan.

Based on the above, we are confident that our plans accommodate a level of growth discussed with the Council in recent years (although final refinement may be required, based on our above review and checks) to ensure that sufficient water is available within the local area to meet a supply-demand balance. The interventions we will deliver to meet this balance are a mix of new water supplies and demand management initiatives as set out in the sections below.

As applications are made through our developer enquiry process, we will work with local authorities and developers to carry out the appropriate detailed network modelling assessments, to ensure that any necessary infrastructure reinforcement is delivered (to move water to where is needed at a development level) ahead of the occupation of development. Where there are infrastructure constraints, it is important not to underestimate the time required to deliver necessary infrastructure. We are therefore committed and willing to ensure engagement and communication at the earliest opportunity.

#### New Water Supplies and Infrastructure Development

In the period 2025 to 2030 we are undertaking schemes to provide improved connectivity and resilience to the Alton and Whitehill & Bordon and supply area. In 2040 a new transfer spur from the Thames to Southern strategic resource option (SRO) will provide 10 MI/d in our WRZ4 (Bracknell). This scheme will use water from proposed new strategic treated water pipeline between Thames and Southern Water and transfer to our existing service reservoir south of Basingstoke.

#### Demand Management

Our aim of reducing household consumption to reach our per capita consumption ambition of 110 l/h/d by 2050 requires the use of new approaches and technology, including smart metering. The savings are stretching and will be challenging to deliver especially given the impacts that affluence, temperature and rainfall have on our regional water use.

It is recognised that, if we work in isolation, it is unlikely we will achieve the levels of per capita consumption included in our forecast. Our ambitious water efficiency strategy, alongside the water labelling of all water using products (already committed to by government), will achieve the forecast per capita consumption reductions required in the shorter term. Longer term we have made assumptions that wider initiatives will drive water efficiency, and examples include mandated water labelling (with minimum standards), stricter mandated building codes, design and regulations as well as national water efficiency messaging, policies and targets.

We recommend the need for mandatory housing standards for water use which would support water efficiency in new buildings and promote collaboration between councils and developers. Sustainable design standards for all residential and non-residential developments, including water use standards, should be a focus for developers as well as a monitoring responsibility for councils.

We welcome and fully support policy NBE8 with the requirement of *“all residential developments for new dwellings will be required to demonstrate that it meets a water efficiency standard of no more than 95 litres per person per day unless not technically feasible or unviable.”*

We are keen to discuss any future collaborations with the Council in any potential water efficiency initiatives or proof of concept trials etc that can benefit customers within the area.

#### Summary

Following our draft Water Resources Management Plan (WRMP) consultation, which took place between 14 November 2022 and 20 February 2023, we have now published our revised plan and consultation Statement of Response. This plan sets out how we intend to maintain the balance between increasing demand for water and available supplies over the next 50 years up to 2075. The plan takes into account planned housing growth as well as the potential impact of climate change and includes our ambitious water efficiency and leakage reduction programmes.

You can read the revised plan, as well as our Statement of Response by visiting our website, [here](#).

Best Regards,

██████████

██████████

## NBE1: Development in the Countryside

Southern Water understands the desire to protect countryside areas. However, we cannot support the current wording of this policy as it could create a barrier to statutory utility providers, such as Southern Water, from delivering essential infrastructure required to serve existing and planned development.

Policy NBE1 seeks to prevent development outside the built-up area unless it is for the purposes listed in criteria (a)-(m) of the policy. However this does not allow for essential water or wastewater infrastructure. It is important to recognise that there may be limited options available for the location of new infrastructure due to the need to connect into the existing network. The National Planning Practice Guidance (ref: 34-005-20140306) recognises this scenario and states that *'it will be important to recognise that water and wastewater infrastructure sometimes has particular locational needs (and often consists of engineering works rather than new buildings) which mean otherwise protected areas may exceptionally have to be considered'*.

### Proposed amendment

We therefore propose the following additional wording (underlined) for policy NBE1:

- NBE1.1 Development proposals within the countryside (the area outside settlement policy boundaries and designated Strategic Employment Sites, as define by the Policies Map) will only be supported where they are:*
- [...]*
- m. for essential water or wastewater infrastructure (where no feasible alternative site is available), or [...].*

## NBE7: Managing Flood Risk

Southern Water supports the overall intention of this policy to manage flood risk, in particular the priority given to the use of sustainable drainage. However for major development in areas where SuDS are viable, we believe their use should be mandated. Until Schedule 3 of the Flood & Water Management Act is implemented, S106 of the Water Industry Act continues to confer a right to connect surface water to the public sewer network. Therefore, to increase the effectiveness of this policy we would encourage the prevention of any connection of developments' surface water drainage to the foul sewer network. This is to minimise the risk of sewer flooding, and increase available capacity for foul drainage.

Whilst some parts of the sewer network were originally designed to accommodate surface water, the expansion of towns and cities, in particular of 'urban creep' can exacerbate capacity issues. As stated in Water UK's 21st Century Drainage Programme; *"The country's built environment is constantly changing and "urban creep" – home extensions, conservatories and paving over front gardens for parking – can all add to the amount of water going into our sewers and drains. Green spaces that would absorb rainwater are covered over by concrete and tarmac that will not. In fact, studies show that "urban creep" results in a larger increase in predicted flooding than new housing, because it adds more rainwater to these systems"*.

Southern Water therefore supports this policy's requirement that land for flood management is safeguarded from development – and would add that any areas of land utilised for SuDS such as ponds, swales etc, should also be safeguarded from future alterations or development that would impede their effectiveness.

We therefore support, with suggested additional wording, this policy's approach for its contribution to reducing the risk of flooding and pollution, in line with paragraphs 166 and 180(e) of the NPPF.

Proposed amendments;

*NBE7.2 Safeguard land and designated structures and features from development that is required for current and future flood management and/or sustainable drainage.*

*NBE7.3 All development will be required to ensure that, as a minimum, there is no net increase in surface water run-off. Priority will be given to the use of SuDS to manage surface water drainage and these should be considered from the outset. SuDS should be designed to meet the relevant standards and accompanied by a concise maintenance and management plan. To avoid increasing the risk of sewer flooding, connection of surface water to the foul sewer network will not be permitted.*

## NBE8: Water Quality, Supply and Efficiency

Southern Water supports the aim of this policy to protect water quality, in particular the requirement for occupation to be aligned with the necessary infrastructure upgrades in cases where there are network capacity constraints.

Water companies are not statutory consultees on planning applications, and developers have a legal right to connect foul drainage on as little as 21 days' notice to the public sewer network, therefore this policy criterion will enable the timing of new connections to the public sewer to be appropriately managed. During the application process, it will allow Southern Water to agree a drainage strategy with the developer, and allow for existing capacity to be considered and upgrading work to be programmed ahead of the occupation of development where necessary. This will avoid the risk of pollution through foul flooding, which would be contrary to paragraphs 166 and 180(e) of the NPPF.

To increase efficacy, we would also encourage the addition of reference to the combined sewer network. A combined sewer is one originally designed to convey both surface water and wastewater in the same pipe. Despite a requirement for new systems to be separated, which has been in place for some time, until Schedule 3 of the Flood & Water Management Act is implemented, *S106 of the Water Industry Act continues to confer a right to connect surface water to the combined sewer network.*

During heavy rain, combined sewer networks' drainage capability can be exceeded by the amount of rainwater entering pipes and storage tanks connected via roads, roofs and paved areas. When these fill up, storm overflows release excess water through outfalls into rivers and the sea to prevent flooding of homes and businesses. Storm overflows are part of the network's original design and are regulated by the Environment Agency. Over time, the expansion of urban settlements as well as 'urban creep' (home extensions, conservatories and paving over front gardens for parking) have incrementally added to the amount of rainwater entering sewers, increasing reliance on network pressure release via storm overflows to prevent flooding.

The Environment Act 2021 places a legally binding duty on water companies to progressively reduce the adverse impacts of discharges from storm overflows. Work is underway to reduce reliance on these systems and by 2025, water companies will have reduced storm overflow discharges from 2020 levels by around 25%. (DEFRA, Storm Overflows Discharge Reduction Plan 2023).

Preventing surface water from entering the foul and combined systems during heavy rainfall is the most sustainable and cost-effective way to reduce storm overflows. Southern Water is investing heavily in work to reduce their use across its region (see [southernwater.co.uk/water-for-life/clean-rivers-and-seas-plan/map](https://southernwater.co.uk/water-for-life/clean-rivers-and-seas-plan/map)), in part by removing existing connections of surface water to the combined and foul networks. Allowing new connections will extend the amount of time and money needed to resolve the issue.

We therefore request the following additional wording;

**NBE8.3** *Suitable arrangements for the disposal of foul water into a sewerage system will need to be incorporated at the nearest point of adequate capacity in consultation with the service provider. To protect water quality, there will be a presumption against connection of surface water to the combined sewer.*

## DCG1: Infrastructure

As the wastewater undertaker and water supplier to the southern part of East Hampshire District, Southern Water supports this policy dedicated to the provision of infrastructure by development through working with the council and other relevant infrastructure providers.

However, over the lifetime of the Local Plan Southern Water may need to deliver improvements to its existing, or provide new, strategic infrastructure (such as wastewater treatment works) in order to accommodate planned growth across catchments, and/or meet stricter water quality objectives. Southern Water therefore looks to Local Plan policies to support water companies' plans to effectively deliver infrastructure at a strategic level, as well as support for phased delivery at a local level. We note that this is referenced in supporting text paragraph 9.3, but request that this is included in policy.

Page 8 of the National Policy Statement for Wastewater states that *'Waste water treatment is essential for public health and a clean environment. Demand for new and improved waste water infrastructure is likely to increase in response to the following main drivers: More stringent statutory requirements to protect the environment and water quality; Population growth and urbanisation; Replacement or improvement of infrastructure; Adaption to climate change.* In addition, Paragraph 20 of the revised National Planning Policy Framework (NPPF) (2018), states: *"Strategic policies should [...] make sufficient provision for... infrastructure for waste management, water supply, wastewater..."*

In order to reflect the fact that it is often solely within the remit of the infrastructure provider, rather than the developer, to provide upgrades necessary not only to facilitate individual developments, but to better serve the wider community and/or make necessary catchment scale environmental improvements, we would seek the support of local plan policy in this regard.

### Proposed amendment

*Proposals by service providers for the delivery of new or improved water supply and/or wastewater infrastructure will be supported, subject to other policies in the development plan.*

## HDN2 – Land South of Five Heads Road

Southern Water is the statutory wastewater undertaker for Horndean. As such, we have undertaken a preliminary assessment of the capacity of our existing infrastructure and its ability to meet the forecast demand for this proposal. The assessment reveals that existing local sewerage infrastructure to the site has limited capacity to accommodate the proposed development. Limited capacity is not a constraint to development provided planning policy and subsequent conditions ensure that occupation of the development is phased to align with the delivery of new wastewater infrastructure.

Proposals for 118 dwellings at this site will generate a need for reinforcement of the wastewater network in order to provide additional capacity to serve the development. This reinforcement will be provided through the New Infrastructure charge to developers, and Southern Water will need to work with site promoters to understand the development program and to review whether the delivery of network reinforcement aligns with the occupation of the development. Connection of new development at this site ahead of new infrastructure delivery could lead to an increased risk of flooding unless the requisite works are implemented in advance of occupation.

Southern Water has limited powers to prevent connections to the sewerage network, even when capacity is limited; water companies are not statutory consultees on planning applications, and under Section 106 of the Water Industry Act, developers have a right to connect foul drainage on 21 days' notice to the public sewer network. It is therefore important that our suggested criterion is included in the site allocation policy to ensure that it is considered as an essential part of planning for the site's delivery.

Planning policies and conditions play an important role in ensuring that development is coordinated with the provision of the infrastructure required to serve it, in accordance with paragraphs 8(a) and 11(a) of the revised National Planning Policy Framework 2023 (NPPF) and does not contribute to flooding or pollution of the environment, in line with paragraphs 166 and 180(e) of the NPPF.

Having regard to the above, Southern Water proposes the following additions to the Infrastructure Requirements of HDN2 (new text underlined):

***On site drainage: western parts of the site have been identified as highly compatible with infiltration sustainable drainage systems but in eastern areas, significant constraints have been indicated. Appropriate infrastructure will be required to mitigate flood risks. Occupation of development will be phased to align with the delivery of sewerage infrastructure, in consultation with the service provider.***

## CFD1 – Land at Clanfield County Farm

Southern Water is the statutory wastewater undertaker for Clanfield. As such, we have undertaken a preliminary assessment of the capacity of our existing infrastructure and its ability to meet the forecast demand for this proposal. The assessment reveals that existing local sewerage infrastructure to the site has limited capacity to accommodate the proposed development. Limited capacity is not a constraint to development provided planning policy and subsequent conditions ensure that occupation of the development is phased to align with the delivery of new wastewater infrastructure.

Proposals for 100 dwellings at this site will generate a need for reinforcement of the wastewater network in order to provide additional capacity to serve the development. This reinforcement will be provided through the New Infrastructure charge to developers, and Southern Water will need to work with site promoters to understand the development program and to review whether the delivery of network reinforcement aligns with the occupation of the development. Connection of new development at this site ahead of new infrastructure delivery could lead to an increased risk of flooding unless the requisite works are implemented in advance of occupation.

Southern Water has limited powers to prevent connections to the sewerage network, even when capacity is limited; water companies are not statutory consultees on planning applications, and under Section 106 of the Water Industry Act, developers have a right to connect foul drainage on 21 days' notice to the public sewer network. It is therefore important that our suggested criterion is included in the site allocation policy to ensure that it is considered as an essential part of planning for the site's delivery.

Planning policies and conditions play an important role in ensuring that development is coordinated with the provision of the infrastructure required to serve it, in accordance with paragraphs 8(a) and 11(a) of the revised National Planning Policy Framework 2023 (NPPF) and does not contribute to flooding or pollution of the environment, in line with paragraphs 166 and 180(e) of the NPPF.

Having regard to the above, Southern Water proposes the following additions to the Infrastructure Requirements of CFD1 (new text underlined):

***On site drainage: the site is highly compatible with infiltration sustainable drainage systems. Appropriate infrastructure will be required to mitigate flood risks. Occupation of development will be phased to align with the delivery of sewerage infrastructure, in consultation with the service provider.***



**Email:** [planning.consultations@surreycc.gov.uk](mailto:planning.consultations@surreycc.gov.uk)



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

**Environment,  
Infrastructure & Growth  
Directorate  
Third Floor,  
Quadrant Court,  
35 Guildford Road,  
Woking  
GU22 7QQ**

Sent by email to: [localplan@easthants.gov.uk](mailto:localplan@easthants.gov.uk)

4 March 2024

Dear Sir or Madam,

### **East Hampshire Draft Local Plan Consultation**

Thank you for consulting Surrey County Council (SCC) on the East Hampshire draft Local Plan. This is an officer response reflecting the council's role as the responsible authority for Surrey for highways and transport, education, minerals and waste planning and the Local Nature Recovery Strategy and as the Lead Local Flood Authority.

Our comments in response to this consultation are set out under the relevant headings below and should be read alongside our letters to you dated 12 January 2023, 19 March 2019 and 15 October 2019, all attached as an annex to this letter.

#### **Highways and Transport Issues**

There are a number of proposed site allocations in the north and north-east planning area, namely a 1000 home site in Alton (ALT8) plus a further 910 homes from smaller sites in Alton/Four Marks and 667 homes from smaller sites in Whitehill/ Bordon, all of which are located near to Surrey's highway network. The impact of these allocations on the Surrey highway network should be assessed through Transport Assessment/Statements produced as part of the planning applications for the individual sites.

We note the transport background paper sets out that East Hampshire District Council will undertake a detailed assessment of the transport implications of future development to support its Pre-submission (Regulation 19) Local Plan. We await this supporting evidence to assess cumulative impacts on the highway network to determine if there is any material impact on our network. In particular, we expect traffic impacts along A31 corridor from the SCC boundary to the eastern side of Farnham should be assessed and considered.

A small allocation, HOP1 Land north of Fullers Road, which is for 19 new homes is in close proximity to the Surrey border, and therefore could have a direct impact on the Surrey highway network. A Transport Statement should be produced outlining the proposals, pedestrian and cycle infrastructure and any impacts on our network.

In our previous response we stated that it would be important to engage with other authorities with an interest in the provision of transport infrastructure to meet the needs of any proposed development, including National Highways, Hampshire County Council and Waverley Borough Council. It would be useful if the district could coordinate joint discussions at an appropriate stage as the plan progresses.

### **Education Issues**

In our previous response we commented that any proposed development in East Hampshire is likely to impact on secondary schools in the Farnham and Haslemere areas. Our current secondary school sites in Farnham have limited or no ability to expand. Hampshire County Council, as the Local Education Authority, is best placed to comment on any need for additional school places and we would welcome further discussion with your officers as the plan develops. Education Place Planning will continue to work with Hampshire County Council and local borough and district councils to ensure there are sufficient school places for any additional pupil yield from housing.

### **Minerals and Waste Issues**

SCC have previously made comments relating to the Alton Road Sandpit minerals site, located in the district of Waverley, and adjacent to the boundary with East Hampshire. The site is currently active, and operations comprise the extraction of sand and clay and infilling with inert waste. As the neighbouring Minerals Planning Authority, we would be concerned by any residential development within close proximity to Alton Road Sandpit that could prejudice the continued and future operation of the site.

We note that site allocation HOP1 – Land north of Fullers Road, Holt Pound, is located approximately 600m from Alton Road Sandpit. Due to its proximity, we would request that Alton Road Sandpit and SCC's minerals development framework are clearly referenced within the list of constraints and opportunities associated with site allocation HOP1. Any necessary measures to mitigate the impacts of operations at Alton Road Sandpit to acceptable levels would need to be designed and implemented by the applicant/developer in line with paragraph 193 of the National Planning Policy Framework 2023.

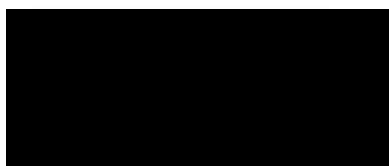
### **Environment and Flood Risk**

As responsible authority for the Local Nature Recovery Strategy (LNRS) within Surrey, SCC welcomes East Hampshire's District Councils support for protecting and enhancing biodiversity through the Local Plan. We acknowledge and are pleased that our previous comments regarding the consideration of Green-Blue infrastructure have been addressed.

We would suggest that the definition of green and blue infrastructure on page 125 should include reference to sustainable drainage systems (not just rivers, streams and wetlands). The words SuDS are not specifically used within policy NBE12 and we would recommend that this is reviewed or the definition changed to reduce any potential cross boundary flood risk in Surrey. It would also be useful to refer to SuDS within policy NBE8.2.

We trust that the above comments are helpful. If you require further information, please contact [REDACTED] by email at [REDACTED][@surreycc.gov.uk](mailto:[REDACTED]@surreycc.gov.uk).

Yours sincerely,



Principal Planning Officer  
Surrey County Council

**Email:** [planning.consultations@surreycc.gov.uk](mailto:planning.consultations@surreycc.gov.uk)



Planning Policy Team,  
East Hampshire District Council,  
Penns Place,  
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**Environment, Transport  
& Infrastructure  
Directorate**

**Third Floor,  
Quadrant Court,  
35 Guildford Road,  
Woking  
GU22 7QQ**

Sent by email to: [localplan@easthants.gov.uk](mailto:localplan@easthants.gov.uk)

12 January 2023

Dear Sir or Madam,

### **East Hampshire Key Issues and Priorities Consultation**

Thank you for consulting Surrey County Council (SCC) on the key issues and priorities that should be addressed in the new East Hampshire Local Plan 2021 to 2040. This is an officer response reflecting the council's role as the responsible authority for Surrey for highways and transport, education, minerals and waste planning and as the Lead Local Flood Authority.

Our comments in response to this consultation are set out under the relevant headings below and should be read alongside our letters to you dated 19 March 2019 and 15 October 2019, both attached as an annex to this letter.

#### **Highways and Transport Issues**

We note the comment that the road network is struggling to cope at particular locations. Surrey County Council approved a new Local Transport Plan 4 in July 2022. The plan sets out county-wide policies on reducing traffic emissions in order to help meet the county's commitment to becoming net zero by 2050. In our previous responses we commented that we were concerned about proposed allocations close to the Surrey boundary and the impact on traffic flows on the A325 and A31. The potential cross boundary impacts should be assessed prior to any allocations in the North East area of the district being taken forward in the next iteration of the Local Plan. We stated that it would be important to engage with other authorities with an interest in the provision of transport infrastructure to meet the needs of any proposed development, including National Highways, Hampshire County Council and Waverley Borough Council and it would be useful if the district could coordinate joint discussions at an appropriate stage in the process of progressing the plan.

Depending on the sites which are allocated consideration will need to be given to potential mitigation measures. Any transport schemes should be included in the infrastructure

schedule of the Infrastructure Delivery Plan with a requirement for appropriate developer contributions towards funding these schemes.

### **Education Issues**

In our previous response we commented that any proposed development in East Hampshire may impact on secondary schools in the Farnham and Haslemere areas. Hampshire County Council, as the Local Education Authority, would be best placed to comment on any need for additional school places and we would welcome further discussion with your officers as the plan develops.

### **Minerals and Waste Issues**

We previously made comments relating to the Alton Road Sandpit. As the neighbouring MPA, we would be concerned by any residential development within close proximity to the Alton Road Sandpit that could comprise a threat to the operation of this existing site.

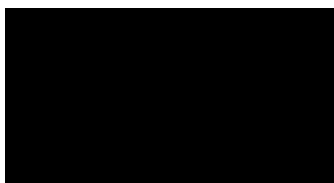
### **Environment**

It is good to see highlighted that trees and other green infrastructure could play an important role in reducing flood risks.

Page 44 relates to Green Infrastructure. We would encourage the consideration of Green-Blue infrastructure, as green spaces can be multifunctional.

We trust that the above comments are helpful. If you require further information, please contact [REDACTED] by email at [REDACTED][@surreycc.gov.uk](mailto:[REDACTED]@surreycc.gov.uk).

Yours sincerely,

A large black rectangular redaction box covering the signature of the Principal Planning Officer.

Principal Planning Officer  
Surrey County Council

**Tel:** 020 8541 9453  
**Email:** [Planning.consultations@surreycc.gov.uk](mailto:Planning.consultations@surreycc.gov.uk)



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

***Highways Transport and  
Environment Directorate***

**Spatial Planning Team  
Surrey County Council  
County Hall  
Kingston upon Thames  
KT1 2DN**

Sent by email to: [localplan@easthants.gov.uk](mailto:localplan@easthants.gov.uk)

15 October 2019

Dear Sir/Madam

**East Hampshire Draft Local Plan 2017-2036 Large Development Sites Consultation**

Thank you for consulting Surrey County Council on the East Hampshire Draft Local Plan 2017-2036 (Regulation 18).

Our comments in response to this consultation are set out under the relevant headings below and should be read alongside our letter to you dated 19 March 2019, sent in response to the earlier consultation on the East Hampshire Draft Local Plan 2017-2036, attached as an annex to this letter.

**Highways and Transport Issues**

In relation to highways and transport issues, each of the currently proposed large sites are, to a greater or lesser extent, likely to impact on the A31 in Surrey. The proposed allocations at Northbrook Park and at Whitehill and Borden are closest to the Surrey boundary, and therefore we remain concerned about the potential for the development of these sites to impact on traffic flows on the A325 and A31.

In our previous response, we expressed our view that these potential impacts should be assessed prior to being taken forward in the next iteration of the Local Plan. It is understood that some baseline modelling work has been undertaken to assess the impacts of the proposed sites on roads within the borough and that it is intended to extend this work to assess the cross boundary impacts to inform the next Regulation 19 Local Plan consultation. We anticipate that further extension of this work will identify appropriate measures to resolve any cross boundary impacts. We hope that particular consideration will be given to jointly promoting any appropriate schemes that have been included with the Waverley Local Plan, including those relating to bus service provision.

It will be important to engage with other authorities with an interest in the provision of transport infrastructure to meet the needs of the proposed new development, including Highways England, Hampshire County Council and Waverley Borough Council and it would be useful if the District Council could coordinate joint discussions at an appropriate stage in the process of progressing the plan.

We would reiterate our expectation, expressed in our previous letter, that in the event of either the site at Northbrook or Whitehill and Borden being allocated, consideration will be given to promoting the Wrecclesham by-pass scheme as a potential mitigation measure along with the Hickleys Corner underpass scheme.

It is considered that any transport schemes necessary to ensure that the impacts of proposed new development are acceptable should be included in the infrastructure schedule of the Infrastructure Delivery Plan. These requirements should also be set out within the site related policies of the Local Plan to ensure that appropriate developer contributions are secured towards funding these schemes.

### **Education Issues**

We are aware that the proposed development may also impact on secondary schools in the Farnham and Haslemere areas. We would therefore welcome further discussion with your officers, along with Hampshire County Council as the Local Education Authority, to clarify how additional need in these areas is intended to be met.

### **Minerals and Waste Issues**

We previously made comments relating to the Alton Road Sandpit. This site is now operational under the permission for the extraction of sand (770,000 tonnes) and clay (512,000 cubic metres) from a site of 36.2 ha; filling of existing and resultant void with (2.6 million cubic metres) non-hazardous industrial, commercial, household and inert waste; installation of plant and equipment; alterations to existing site access onto A31; and comprehensive restoration of the site over a period of 11.5 years without compliance with Condition 1 of planning permission ref. WA99/0223 to allow the development to be completed in all respects no later than 31 December 2029.

As the neighbouring MPA, we would be concerned by any new residential development within close proximity to the Alton Road Sandpit site that could comprise a threat to the operation of this existing site, which is vital to the supply of soft sand in Surrey and the wider south east region. It would typically be considered, in accordance of paragraph 182 of the NPPF, that the plan making authority, as 'the agent of change' in promoting this development, must ensure that suitable mitigation can feasibly be delivered to safeguard the future operation of the quarry.

If you have any queries, please do not hesitate to contact [REDACTED] on 0208 541 9453, or by email at [REDACTED]@surreycc.gov.uk.

[REDACTED]  
[REDACTED]  
Spatial Planning Team

**Tel:** 020 8541 9453  
**Email:** [Planning.consultations@surreycc.gov.uk](mailto:Planning.consultations@surreycc.gov.uk)



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

***Highways Transport and  
Environment Directorate***

**Spatial Planning Team  
Surrey County Council  
County Hall  
Kingston upon Thames  
KT1 2DN**

Sent by email to: [localplan@easthants.gov.uk](mailto:localplan@easthants.gov.uk)

19 March 2019

Dear Sir/Madam

**East Hampshire Draft Local Plan 2017-2036 Consultation**

Thank you for consulting Surrey County Council on the East Hampshire Draft Local Plan 2017-2036 (Regulation 18). We have comments to make as the highways and transport and as the minerals and waste planning authorities for Surrey. Our comments are set out under the relevant headings below.

**Surrey highways and transport authority comments**

Our highways and transport concerns mainly relate to the proposed allocation of Site SA21 Northbrook Park for a new settlement comprising a minimum of 800 dwellings. We also have concerns about the additional 1,534-1794 dwellings proposed for allocation in Whitehill Bordon.

We welcome the statement in the IDP that the council will work with us, as a neighbouring authority, to determine the transport infrastructure improvements required to support the delivery of the allocated sites proposed in the Draft Local Plan, and we note the specific reference to these two sites. Both have the potential to generate significant increases in traffic on the already overstretched network of the A325, through Wrecclesham, and on the A31 Farnham Bypass. We consider that the transport impacts of these proposed allocations should be assessed prior to their being finalised in the next iteration of the Local Plan. They will of course be subject to a full Transport Assessment at the planning application stage. It is expected that the measures necessary to mitigate the impacts of additional traffic on the A325/A31 around Farnham will be appropriately funded by developer contributions.

We fully support the aspiration in the Local Plan for new homes to be “directed to the most sustainable and accessible locations in the area”, however, it is our view that seeking to meet a significant proportion of the District’s housing needs at Northbrook Park will not achieve this objective.

In terms of sustainable transport considerations, the Northbrook Park site is equidistant between Bentley and Farnham stations and it is questionable as to whether any form of bus connection to these stations could be economically viable. Bentley offers services northbound and the only destination possible southwards is Alton. In addition, the access

to Bentley station is via single track lanes. To reach places such as Basingstoke and Winchester by rail from Bentley, would mean driving to Farnham, where there is limited opportunity for parking, or further afield.

The Local Plan intention to concentrate additional growth in “locations that can provide supporting infrastructure and facilities provides better opportunities for reducing the reliance on the private car” is fully supported. However, it is considered that securing a sustainable transport solution for a development site in this location will be challenging, particularly for a settlement of this relatively modest size. The achievement of a modal shift away from the private car is considered likely to require dedicated cycle routes to Farnham, Wrecclesham and Bentley alongside bus services provided in perpetuity.

It is noted that the proposed allocation for 800 homes to be provided on the Northbrook Park site is a minimum figure. A larger site could potentially achieve greater connectivity with Farnham and would help to make public transport solutions more viable, such as the provision of a bus service in perpetuity. It could also help to increase the site’s self-reliance in supporting a greater range of facilities such as shops and schools to be provided on-site. This would reduce the need for travel between the site and surrounding towns. However, the creation of an entirely self-reliant site would require expansion of the existing proposals on a massive scale and a substantial investment in transport infrastructure to eliminate any significant impact on Surrey’s surrounding roads.

Significant increases in traffic and congestion in Wrecclesham would be likely to result from the development proposed in the draft Local Plan at Northbrook. Therefore, should the Local Planning Authority decide to pursue the proposals for a strategic allocation for 800 homes or more, the provision of a relief road will be needed to mitigate the impacts on the community in Wrecclesham. It is envisaged that the route for the relief road would link into the A31 at the point of the Northbrook new community. Similarly, the proposed extension to the Whitehill – Bordon settlement is additionally likely to add to congestion in this area. Developer funding from both the Northbrook site as well as from any further expansion of Whitehill Bordon would therefore be expected to make a substantial contribution to the Wrecclesham relief road scheme and also towards improvements on other sections of road including the junction at Hickley’s Corner in Farnham.

### **Surrey minerals and waste planning authority comments**

The proposed site allocation at Northbrook Park borders both Alton Road Sandpit and the Minerals Safeguarding Area (MSA) for soft sand that surrounds Alton Road Sandpit, to the east and south east. Both the boundary of Alton Road Sandpit and the soft sand MSA can be viewed on our Minerals and Waste Safeguarding Online Map Viewer tool, accessible from our website.

Whilst we do not wish to raise an objection to the allocation of this site for future development, we would seek to raise your awareness regarding the activities within close proximity to the site. Alton Road Sandpit has permission for the extraction of sand (770,000 tonnes) and clay (512,000 cubic metres) from a site of 36.2 ha; filling of existing and resultant void with (2.6 million cubic metres) non-hazardous industrial, commercial, household and inert waste; installation of plant and equipment; alterations to existing site access onto A31; and comprehensive restoration of the site over a period of 11.5 years without compliance with Condition 1 of planning permission ref. WA99/0223 to allow the development be completed in all respects not later than 31 December 2029. As of 1<sup>st</sup> of March 2019, working of the mineral has not yet commenced at Alton Road Sandpit.

If you have any queries, please do not hesitate to contact [REDACTED] on 0208 541 9453, or by email at [REDACTED]@surreycc.gov.uk.

Yours sincerely

[REDACTED]





E: [REDACTED]@thamewater.co.uk  
M: [REDACTED]

East Hampshire Council  
Issued via email:  
localplan@easthants.gov.uk

1<sup>st</sup> Floor West  
Clearwater Court  
Vastern Road  
Reading  
RG1 8DB

19 February 2024

## East Hampshire Local Plan 2021-2040 Regulation 18 Consultation, January 2024

Dear Sir/Madam,

Thank you for allowing Thames Water Utilities Ltd (Thames Water) to comment upon the above.

As you will be aware, Thames Water Utilities Ltd (Thames Water) are the statutory sewerage undertaker for the majority of the District (water is supplied by South East Water) and are hence a “specific consultation body” in accordance with the Town & Country Planning (Local Planning) Regulations 2012. We have the following comments in relation to our sewerage undertakings and our land holdings:

### **Policy NBE8 Water Quality, Supply and Efficiency**

We generally support the policy in relation to wastewater/sewerage [and water supply] infrastructure, but consider that the policy could be improved.

Water and wastewater infrastructure is essential to any development. Failure to ensure that any required upgrades to the infrastructure network are delivered alongside development could result in adverse impacts in the form of internal and external sewer flooding and pollution of land and water courses and/or low water pressure.

A key sustainability objective for the preparation of Local Plans and Neighbourhood Plans should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 20 of the revised National Planning Policy Framework (NPPF), 2023, states: “*Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for... infrastructure for waste management, water supply, wastewater...*”

Paragraph 11 states: “*Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that:*

*a) All plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects”*

Paragraph 28 relates to non-strategic policies and states: *“Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure...”*

Paragraph 26 of the revised NPPF goes on to state: *“Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary....”*

The web based National Planning Practice Guidance (NPPG) includes a section on ‘water supply, wastewater and water quality’ and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs. The introduction to this section also sets out that *“Adequate water and wastewater infrastructure is needed to support sustainable development”* (Paragraph: 001, Reference ID: 34-001-20140306).

It is important to consider the net increase in water and wastewater demand to serve the development and also any impact that developments may have off site, further down the network. The new Local Plan should therefore seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Thames Water will work with developers and local authorities to ensure that any necessary infrastructure reinforcement is delivered ahead of the occupation of development. Where there are infrastructure constraints, it is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades take around 18 months and Sewage Treatment & Water Treatment Works upgrades can take 3-5 years.

The provision of water treatment (both wastewater treatment and water supply) is met by Thames Water’s asset plans and from the 1st April 2018 network improvements will be from infrastructure charges per new dwelling.

As from 1st April 2018, the way Thames Water and all other water and wastewater companies charge for new connections has changed. The changes mean that more of Thames Water’s charges will be fixed and published, rather than provided on application, enabling you to estimate your costs without needing to contact us. The services affected include new water connections, lateral drain connections, water mains and sewers (requisitions), traffic management costs, income offsetting and infrastructure charges.

Information on how off site network reinforcement is funded can be found here <https://developers.thameswater.co.uk/New-connection-charging>

Thames Water therefore recommends that developers engage with them at the earliest opportunity (in line with paragraph 26 of the revised NPPF) to establish the following:

- The developments demand for Sewage/Wastewater Treatment and network infrastructure both on and off site and can it be met; and
- The surface water drainage requirements and flood risk of the development both on and off site and can it be met.

Thames Water offer a free Pre-Planning service which confirms if capacity exists to serve the development or if upgrades are required for potable water, waste water and surface water requirements. Details on Thames Water’s free pre planning service are available at:

<https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity>

You may also be interested in our Drainage and Wastewater Management Plan (DWMP). This 25-year plan will reduce future pressures on our wastewater service. It sets out our approach and the investment needed to deliver a sustainable service that protects the environment, for generations to come. <https://www.thameswater.co.uk/about-us/regulation/drainage-and-wastewater-management>

In light of the above comments and Government guidance we support Policy NBE8.1 – NBE8.3.

Local Authorities should also consider both the requirements of the utilities for land to enable them to meet the demands that will be placed upon them. This is necessary because it will not be possible to identify all the water and wastewater/sewerage infrastructure required over the plan period due to the way water companies are regulated and plan in 5 year periods (AMPs). Thames Water are currently in AMP7 which covers the period from 1st April 2020 to 31st March 2025. AMP8 will cover the period from 1st April 2025 to 31st March 2030. The Price Review, whereby the water companies' AMP8 Business Plan will be agreed with Ofwat during 2024.

Hence, a further text should be added to Policy as follows:

***“The development or expansion of water supply or waste water facilities will normally be permitted, either where needed to serve existing or proposed development in accordance with the provisions of the Development Plan, or in the interests of long term water supply and waste water management, provided that the need for such facilities outweighs any adverse land use or environmental impact that any such adverse impact is minimised.”***

### **Development within the vicinity of Sewage Treatment Works and Sewage Pumping Stations**

The new Local Plan and Policy NBE8 should also assess the impact of any development within the vicinity of existing sewage works/sewage pumping stations in line with the Agent of Change principle set out in the NPPF, paragraph 187.

Where development is being proposed within 800m of a sewage treatment works or 15m of a sewage pumping station, the developer or local authority should liaise with Thames Water to consider whether an odour impact assessment is required as part of the promotion of the site and potential planning application submission. The odour impact assessment would determine whether the proposed development would result in adverse amenity impact for new occupiers, as those new occupiers would be located in closer proximity to a sewage treatment works/pumping station.

Paragraph 174 of the NPPF, February 2021, sets out that: *“Planning policies and decisions should contribute to and enhance the natural and local environment by: ....e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans...”*

Paragraph 185 goes on to state: *“Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including*

*cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development....”*

The online PPG states at Paragraph: 005 Reference ID: 34-005-20140306 that: “*Plan-making may need to consider: ...whether new development is appropriate near to sites used (or proposed) for water and wastewater infrastructure (for example, odour may be a concern)..”*

The odour impact study would establish whether new resident’s amenity will be adversely affected by the sewage works and it would set the evidence to establish an appropriate amenity buffer. On this basis, text similar to the following should be incorporated into the Local Plan Policy NBE8: **“When considering sensitive development, such as residential uses, close to the Sewage Treatment Works, a technical assessment should be undertaken by the developer or by the Council. The technical assessment should be undertaken in consultation with Thames Water. The technical assessment should confirm that either: (a) there is no adverse amenity impact on future occupiers of the proposed development or; (b) the development can be conditioned and mitigated to ensure that any potential for adverse amenity impact is avoided.”**

In relation to NBE8.4, Thames Water do not cover water supply for East Hampshire, but we do support water efficiency.

The Environment Agency has designated the Thames Water region (and the south east) to be an area of “*serious water stress*” which reflects the extent to which available water resources are used. Future pressures on water resources will continue to increase and key factors are population growth and climate change. On average our customers each use 30% more water than they did 30 years ago. Therefore water efficiency measures employed in new development are an important tool to help us sustain water supplies for the long term.

Water conservation and climate change is a vitally important issue to the water industry. Not only is it expected to have an impact on the availability of raw water for treatment but also the demand from customers for potable (drinking) water. Therefore, Thames Water support the mains water consumption target of 110 litres per head per day (105 litres per head per day plus an allowance of 5 litres per head per day for gardens) as set out in the NPPG (Paragraph: 014 Reference ID: 56-014-20150327) and support the inclusion of this requirement in Policy.

Thames Water promote water efficiency and have a number of water efficiency campaigns which aim to encourage their customers to save water at local levels. Further details are available on our website via the following link:  
<https://www.thameswater.co.uk/Be-water-smart>

It is our understanding that the water efficiency standards of 110 litres per person per day is only applied through the building regulations where there is a planning condition requiring this standard (as set out at paragraph 2.8 of Part G2 of the Building Regulations). As the Thames Water area is defined as water stressed it is considered that such a condition should be attached as standard to all planning approvals for new residential development in order to help ensure that the standard is effectively delivered through the building regulations.

Within Part G of Building Regulations, the 110 litres/person/day level can be achieved through either the ‘Calculation Method’ or the ‘Fittings Approach’ (Table 2.2). The Fittings Approach provides clear flow-rate and volume performance metrics for each water using device / fitting in new dwellings. Thames Water considers the Fittings Approach, as outlined in Table 2.2 of Part G, increases the confidence that water efficient devices will be installed in the new dwelling. Insight from our smart water metering programme shows that household built to the

110 litres/person/day level using the Calculation Method, did not achieve the intended water performance levels.

We therefore consider that text in line with the following should be included in the Local Plan: ***“Development must be designed to be water efficient and reduce water consumption. Refurbishments and other non-domestic development will be expected to meet BREEAM water-efficiency credits. Residential development must not exceed a maximum water use of 105 litres per head per day (excluding the allowance of up to 5 litres for external water consumption) using the ‘Fittings Approach’ in Table 2.2 of Part G of Building Regulations. Planning conditions will be applied to new residential development to ensure that the water efficiency standards are met.”***

### **Policy NBE7 Managing Flood Risk**

In relation to flood risk, the National Planning Practice Guidance (NPPG) states that a sequential approach should be used by local planning authorities in areas known to be at risk from forms of flooding other than from river and sea, which includes "Flooding from Sewers".

When reviewing development and flood risk it is important to recognise that water and/or sewerage infrastructure may be required to be developed in flood risk areas. By their very nature water and sewage treatment works are located close or adjacent to rivers (to abstract water for treatment and supply or to discharge treated effluent). It is likely that these existing works will need to be upgraded or extended to provide the increase in treatment capacity required to service new development. Flood risk sustainability objectives should therefore accept that water and sewerage infrastructure development may be necessary in flood risk areas.

Flood risk policies should also make reference to ‘sewer flooding’ and an acceptance that flooding can occur away from the flood plain as a result of development where off site sewerage infrastructure and capacity is not in place ahead of development.

With regard to surface water drainage it is the responsibility of the developer to make proper provision for drainage to ground, watercourses or surface water sewer in accordance with the drainage hierarchy. It is important to reduce the quantity of surface water entering the sewerage system in order to maximise the capacity for foul sewage to reduce the risk of sewer flooding.

Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to SuDS that limits as far as possible the volume of and rate at which surface water enters the public sewer system. By doing this, SuDS have the potential to play an important role in helping to ensure the sewerage network has the capacity to cater for population growth and the effects of climate change.

SuDS not only help to mitigate flooding, they can also help to: improve water quality; provide opportunities for water efficiency; provide enhanced landscape and visual features; support wildlife; and provide amenity and recreational benefits.

With regard to surface water drainage, Thames Water request that the following paragraph should be included in Policy wording or supporting text: ***“It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding.”***

Also to mitigate flood risk both on and off-site: “surface water drainage system discharge rates should be restricted to the equivalent Greenfield Qbar runoff rate or as close as practically possible, but never greater than 2 litres per second per hectare (2l/s/Ha).” in line with CIRIA guidance.

## **Allocations**

The information contained within the new Local Plan will be of significant value to Thames Water as we prepare for the provision of future water supply/wastewater infrastructure.

The attached table provides Thames Water’s site specific comments from desktop assessments on water supply, sewerage/waste water network and waste water treatment infrastructure in relation to the proposed sites, but more detailed modelling may be required to refine the requirements.

Thames Water only provide waste water service to the Northern Parts of East Hampshire, with water services being provided by South East Water  
<https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/where-our-pipes-are>

In planning waste water infrastructure for East Hampshire Thames Water needs to consider the growth that would affect the following Sewage Treatment Works (STWs):

<b>Local Authority Area</b>	<b>S.T.W. Catchments</b>
East Hampshire	Alton
East Hampshire	Bentley
East Hampshire	Bordon (Outside TW)
East Hampshire	Bordon (Within TW)
East Hampshire	Farnham
East Hampshire	Selbourne

Early engagement between the developers and Thames Water would be beneficial to understand:

- What drainage requirements are required on and off site
- Clarity on what loading/flow from the development is anticipated
- Water supply requirements on and off site

The time to deliver water/wastewater infrastructure should not be underestimated. It can take 18 months – 3 years for local upgrades and 3 – 5 years plus for more strategic solutions to be delivered. It is therefore vital that the Council and Developers work alongside Thames Water so that we can build up a detailed picture what is being built where, get confidence of when that development is going to start and what the phasing of that development will be.

To support this Thames Water offers a Free pre planning service where developer can engage Thames water to understand what if any upgrades will be needed to serve the development where and when.

Link here > <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity>

We recommend developers attach the information we provide to their planning applications so that the Council and the wider public are assured water and waste matters for the development are being addressed.

## **Proposed Change**

Include reference to concerns regarding waste water/water supply network capacity and the need to liaise with Thames Water to determine whether a detailed drainage/water infrastructure strategy informing what infrastructure is required, where, when and how it will be delivered is required.

### **ALT3 Land adjacent to Alton Sewage Treatment Works, Alton**

We support the allocation.

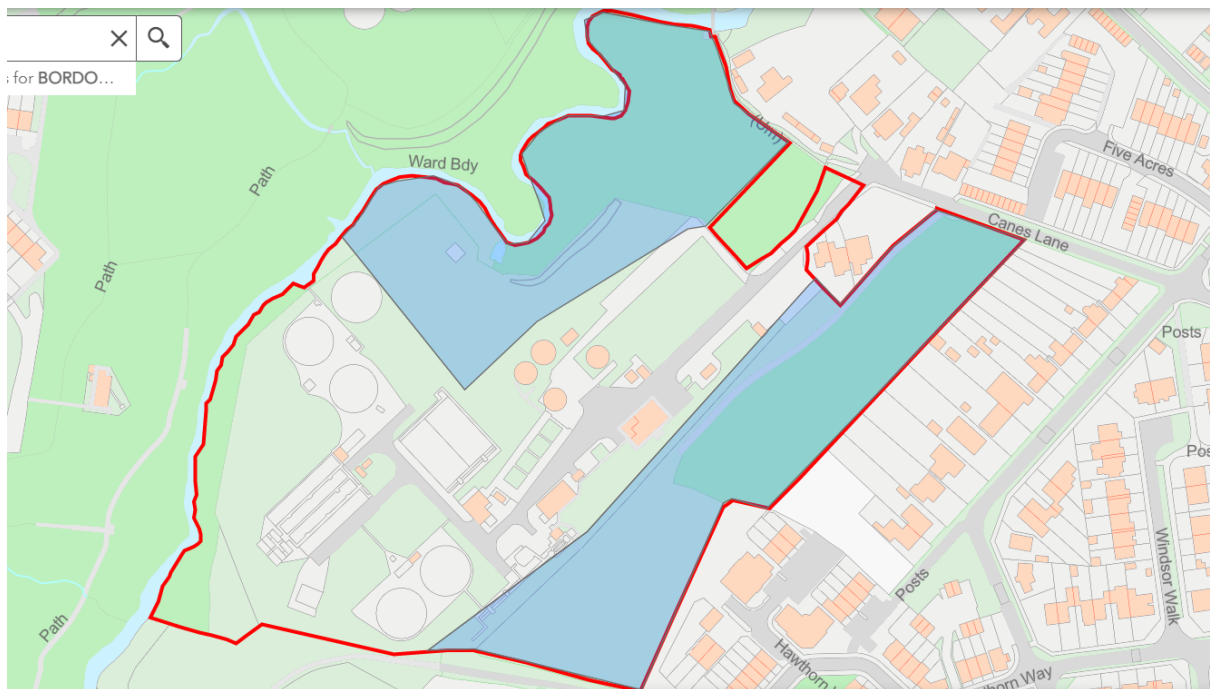
The land is currently retained operational land associated with Alton Sewage Treatment Works. The type of development suitable would be general industrial/storage/warehousing

### **Potential Development Sites**

#### **Land at Bordon Sewage Treatment Works, Canes Lane, Lindford, Bordon GU35 0RP**

The sites shaded blue on the plan below are currently retained operational land, but could potentially be made available for redevelopment:

The STW and land shaded blue below is well related to the settlement of Lindford and would therefore represent a sustainable development location and we would be willing to work with the council to review the feasibility of this.



We trust the above is satisfactory, but please do not hesitate to contact [REDACTED] on the above number if you have any queries.

Created Date	Site ID	Site Name	ServiceType	Net Gain to System (l/day)	Net Foul Water Increase to System (l/s)	Net Property Equivalent Increase - Waste	Net Increase in Demand (l/day)	Net Increase in Peak Demand (l/s)	Net Property Equivalent Increase - Water
25/01/2024	60713	ALT1 Land at Brick Kiln Lane, Alton	Waste	160380	1.86	150	0	0	0

**Standard Paragraphs:**

On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ

**Internal Comments:**

None

Created Date	Site ID	Site Name	ServiceType	Net Gain to System (l/day)	Net Foul Water Increase to System (l/s)	Net Property Equivalent Increase - Waste	Net Increase in Demand (l/day)	Net Increase in Peak Demand (l/s)	Net Property Equivalent Increase - Water
25/01/2024	76507	ALT3 Land adjacent to Alton Sewage Treatment Works, Alton	Waste	0	0	0	0	0	0

**Standard Paragraphs:**

The scale of development/s is likely to require upgrades to both the wastewater network and sewage treatment infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The plan should determine the magnitude of spare capacity currently available within the network and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The developer can request information on the network and treatment infrastructure by visiting the Thames Water website <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development>. Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ

**Internal Comments:**

None

Created Date	Site ID	Site Name	ServiceType	Net Gain to	Net Foul Water	Net Property	Net Increase	Net Increase	Net Property
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				System (l/day)	Increase to System (l/s)	Equivalent Increase - Waste	in Demand (l/day)	in Peak Demand (l/s)	Equivalent Increase - Water
25/01/2024	76509	ALT4 Land at Whitedown Lane, Alton	Waste	96228	1.11	90	0	0	0

**Standard Paragraphs:**

On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ

**Internal Comments:**  
None

Created Date	Site ID	Site Name	ServiceType	Net Gain to System (l/day)	Net Foul Water Increase to System (l/s)	Net Property Equivalent Increase - Waste	Net Increase in Demand (l/day)	Net Increase in Peak Demand (l/s)	Net Property Equivalent Increase - Water
25/01/2024	73836	ALT5 Land at Travis Perkins (Mounters Lodge part)	Waste	25660.8	0.3	24	0	0	0

**Standard Paragraphs:**

On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ

**Internal Comments:**  
None

Created Date	Site ID	Site Name	ServiceType	Net Gain to System (l/day)	Net Foul Water Increase to System (l/s)	Net Property Equivalent Increase - Waste	Net Increase in Demand (l/day)	Net Increase in Peak Demand (l/s)	Net Property Equivalent Increase - Water
25/01/2024	60006	ALT6 Land at Wilsom Road, Alton	Waste	0	0	0	0	0	0

**Standard Paragraphs:**

Due to the complexities of wastewater networks the level of information contained in this document does not allow Thames Water to make a detailed assessment of the impact the proposed

housing provision will have on the wastewater infrastructure. To enable us to provide more specific comments on the site proposals we require details of the Local Authority's aspiration for each site. For example, an indication of the location, type and scale of development together with the anticipated timing of development. Thames Water would welcome the opportunity to meet to discuss the wastewater infrastructure needs relating to the Local Plan.

**Internal Comments:**  
None

Created Date	Site ID	Site Name	ServiceType	Net Gain to System (l/day)	Net Foul Water Increase to System (l/s)	Net Property Equivalent Increase - Waste	Net Increase in Demand (l/day)	Net Increase in Peak Demand (l/s)	Net Property Equivalent Increase - Water
25/01/2024	51922	ALT7 Land at Lynch Hill, Alton	Waste	0	0	0	0	0	0

**Standard Paragraphs:**

The scale of development/s is likely to require upgrades to both the wastewater network and sewage treatment infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The plan should determine the magnitude of spare capacity currently available within the network and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The developer can request information on the network and treatment infrastructure by visiting the Thames Water website <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development>. Planning, either by email [Devcon.team@thameswater.co.uk](mailto:Devcon.team@thameswater.co.uk) tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ

**Internal Comments:**  
None

Created Date	Site ID	Site Name	ServiceType	Net Gain to System (l/day)	Net Foul Water Increase to System (l/s)	Net Property Equivalent Increase - Waste	Net Increase in Demand (l/day)	Net Increase in Peak Demand (l/s)	Net Property Equivalent Increase - Water
25/01/2024	76506	ALT8 Land at Neatham Manor Farm, Alton	Waste	1069200	12.38	1000	0	0	0

**Standard Paragraphs:**

The scale of development/s is likely to require upgrades to both the wastewater network and sewage treatment infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The plan should determine the magnitude of spare capacity currently available within the network and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The developer can request information on the network and treatment infrastructure by visiting the Thames Water website <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development>. Planning, either by email [Devcon.team@thameswater.co.uk](mailto:Devcon.team@thameswater.co.uk) tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ

**Internal Comments:**  
VA 14/02/24 - Network concern, Odour concern Alton STW close by

Created Date	Site ID	Site Name	ServiceType	Net Gain to System (l/day)	Net Foul Water Increase to System (l/s)	Net Property Equivalent Increase - Waste	Net Increase in Demand (l/day)	Net Increase in Peak Demand (l/s)	Net Property Equivalent Increase - Water
25/01/2024	76514	BEN1 Land west of Hole Lane, Bentley	Waste	21384	0.25	20	0	0	0

**Standard Paragraphs:**

On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ

**Internal Comments:**  
None

Created Date	Site ID	Site Name	ServiceType	Net Gain to System (l/day)	Net Foul Water Increase to System (l/s)	Net Property Equivalent Increase - Waste	Net Increase in Demand (l/day)	Net Increase in Peak Demand (l/s)	Net Property Equivalent Increase - Water
25/01/2024	76515	BWH1 "Top Field", land adjacent to Glebe Field	Waste	5346	0.06	5	0	0	0

**Standard Paragraphs:**

**Internal Comments:**  
None

Created Date	Site ID	Site Name	ServiceType	Net Gain to System (l/day)	Net Foul Water Increase to System (l/s)	Net Property Equivalent Increase - Waste	Net Increase in Demand (l/day)	Net Increase in Peak Demand (l/s)	Net Property Equivalent Increase - Water
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25/01/2024	45705	BWH2 Land at the corner of Church Street	Waste	5346	0.06	5	0	0	0
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**Standard Paragraphs:**

**Internal Comments:**

None

Created Date	Site ID	Site Name	ServiceType	Net Gain to System (l/day)	Net Foul Water Increase to System (l/s)	Net Property Equivalent Increase - Waste	Net Increase in Demand (l/day)	Net Increase in Peak Demand (l/s)	Net Property Equivalent Increase - Water
25/01/2024	75199	FMS2 Land rear of 97-103 Blackberry Lane	Waste	21384	0.25	20	0	0	0

**Standard Paragraphs:**

On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ

**Internal Comments:**

None

Created Date	Site ID	Site Name	ServiceType	Net Gain to System (l/day)	Net Foul Water Increase to System (l/s)	Net Property Equivalent Increase - Waste	Net Increase in Demand (l/day)	Net Increase in Peak Demand (l/s)	Net Property Equivalent Increase - Water
25/01/2024	62984	FMS4 Land south of Winchester Road, Four Marks	Waste	106920	1.24	100	0	0	0

**Standard Paragraphs:**

The scale of development/s is likely to require upgrades to the wastewater network. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The plan should determine the magnitude of spare capacity currently available within the network and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The developer can request information on network infrastructure by visiting the Thames Water website <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development>.

**Internal Comments:**  
VA 14/02/24 - Capacity concern with local SPS/s

Created Date	Site ID	Site Name	ServiceType	Net Gain to System (l/day)	Net Foul Water Increase to System (l/s)	Net Property Equivalent Increase - Waste	Net Increase in Demand (l/day)	Net Increase in Peak Demand (l/s)	Net Property Equivalent Increase - Water
25/01/2024	76519	HOP1 Land north of Fullers Road, Holt Pound	Waste	20314.8	0.24	19	0	0	0

**Standard Paragraphs:**

On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ

**Internal Comments:**  
None

Created Date	Site ID	Site Name	ServiceType	Net Gain to System (l/day)	Net Foul Water Increase to System (l/s)	Net Property Equivalent Increase - Waste	Net Increase in Demand (l/day)	Net Increase in Peak Demand (l/s)	Net Property Equivalent Increase - Water
25/01/2024	76518	LIP1 Land north of Haslemere Road, Liphook	Waste	25660.8	0.3	24	0	0	0

**Standard Paragraphs:**

On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ

**Internal Comments:**  
None

Created Date	Site ID	Site Name	ServiceType	Net Gain to System (l/day)	Net Foul Water Increase to	Net Property Equivalent	Net Increase in	Net Increase in Peak	Net Property Equivalent
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					System (l/s)	Increase - Waste	Demand (l/day)	Demand (l/s)	Increase - Water
25/01/2024	60703	LIP2 Land west of Headley Road, Liphook	Waste	21384	0.25	20	0	0	0

**Standard Paragraphs:**

On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ

**Internal Comments:**  
None

Created Date	Site ID	Site Name	ServiceType	Net Gain to System (l/day)	Net Foul Water Increase to System (l/s)	Net Property Equivalent Increase - Waste	Net Increase in Demand (l/day)	Net Increase in Peak Demand (l/s)	Net Property Equivalent Increase - Water
25/01/2024	60702	LIP3 Land at Chiltley Farm	Waste	71636.4	0.83	67	0	0	0

**Standard Paragraphs:**

The scale of development/s is likely to require upgrades to the wastewater network. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The plan should determine the magnitude of spare capacity currently available within the network and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The developer can request information on network infrastructure by visiting the Thames Water website <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development>.

**Internal Comments:**  
VA 15/02/24 Foul hydraulic flooding downstream

Created Date	Site ID	Site Name	ServiceType	Net Gain to System (l/day)	Net Foul Water Increase to System (l/s)	Net Property Equivalent Increase - Waste	Net Increase in Demand (l/day)	Net Increase in Peak Demand (l/s)	Net Property Equivalent Increase - Water
25/01/2024	44097	MSD1 Land rear of Junipers, Medstead	Waste	16038	0.19	15	0	0	0

**Standard Paragraphs:**

**Internal Comments:**  
None

Created Date	Site ID	Site Name	ServiceType	Net Gain to System (l/day)	Net Foul Water Increase to System (l/s)	Net Property Equivalent Increase - Waste	Net Increase in Demand (l/day)	Net Increase in Peak Demand (l/s)	Net Property Equivalent Increase - Water
25/01/2024	66802	W&B1 Whitehill & Bordon Town Centre Intensification	Waste	338936.4	3.92	317	0	0	0

**Standard Paragraphs:**

The scale of development/s is likely to require upgrades to the wastewater network. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The plan should determine the magnitude of spare capacity currently available within the network and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The developer can request information on network infrastructure by visiting the Thames Water website <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development>.

**Internal Comments:**  
None

Created Date	Site ID	Site Name	ServiceType	Net Gain to System (l/day)	Net Foul Water Increase to System (l/s)	Net Property Equivalent Increase - Waste	Net Increase in Demand (l/day)	Net Increase in Peak Demand (l/s)	Net Property Equivalent Increase - Water
25/01/2024	40614	W&B2 Land at the Former Bordon Garrison	Waste	3301108.8	38.21	3087	0	0	0

**Standard Paragraphs:**

On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email [Devcon.team@thameswater.co.uk](mailto:Devcon.team@thameswater.co.uk) tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ

**Internal Comments:**  
None

Created Date	Site ID	Site Name	ServiceType	Net Gain to System (l/day)	Net Foul Water Increase to System (l/s)	Net Property Equivalent Increase - Waste	Net Increase in Demand (l/day)	Net Increase in Peak Demand (l/s)	Net Property Equivalent Increase - Water
25/01/2024	66792	W&B3 BOSC Residential Expansion	Waste	2821618.8	32.66	2639	0	0	0

**Standard Paragraphs:**

The scale of development/s is likely to require upgrades to the wastewater network. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The plan should determine the magnitude of spare capacity currently available within the network and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The developer can request information on network infrastructure by visiting the Thames Water website <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development>.

**Internal Comments:**

None

Created Date	Site ID	Site Name	ServiceType	Net Gain to System (l/day)	Net Foul Water Increase to System (l/s)	Net Property Equivalent Increase - Waste	Net Increase in Demand (l/day)	Net Increase in Peak Demand (l/s)	Net Property Equivalent Increase - Water
25/01/2024	66806	W&B4 Louisburg Residential Extension	Waste	28868.4	0.33	27	0	0	0

**Standard Paragraphs:**

On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email [Devcon.team@thameswater.co.uk](mailto:Devcon.team@thameswater.co.uk) tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ

**Internal Comments:**

None

Created Date	Site ID	Site Name	ServiceType	Net Gain to System (l/day)	Net Foul Water Increase to System (l/s)	Net Property Equivalent Increase - Waste	Net Increase in Demand (l/day)	Net Increase in Peak Demand (l/s)	Net Property Equivalent Increase - Water
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25/01/2024	66790	W&B5 North of Louisburg Employment Proposal	Waste	0	0	0	0	0	0
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**Standard Paragraphs:**

The level of information contained in this document does not enable Thames Water to make an assessment of the impact the proposed site allocations will have on the waste water network infrastructure and sewage treatment works. To enable us to provide more specific comments we require details of the location, type and scale of development together with the anticipated phasing.

**Internal Comments:**

None

Created Date	Site ID	Site Name	ServiceType	Net Gain to System (l/day)	Net Foul Water Increase to System (l/s)	Net Property Equivalent Increase - Waste	Net Increase in Demand (l/day)	Net Increase in Peak Demand (l/s)	Net Property Equivalent Increase - Water
25/01/2024	60707	W&B7 Land at Hollywater Road and Mill Chase Road	Waste	134719.2	1.56	126	0	0	0

**Standard Paragraphs:**

The scale of development/s is likely to require upgrades to the wastewater network. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The plan should determine the magnitude of spare capacity currently available within the network and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The developer can request information on network infrastructure by visiting the Thames Water website <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development>.

**Internal Comments:**

None

Created Date	Site ID	Site Name	ServiceType	Net Gain to System (l/day)	Net Foul Water Increase to System (l/s)	Net Property Equivalent Increase - Waste	Net Increase in Demand (l/day)	Net Increase in Peak Demand (l/s)	Net Property Equivalent Increase - Water
25/01/2024	76517	W&B8 Land at the Forest Centre, Whitehill & Bordon	Waste	47044.8	0.54	44	0	0	0

**Standard Paragraphs:**

On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the

Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ

**Internal Comments:**

None

Sent by email:

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

██████████  
**Team Leader (Local Plans and Planning Policy)**

E-mail: ██████████@waverley.gov.uk

Direct line: ██████████

Calls may be recorded for training or monitoring

Date: 29<sup>th</sup> February 2024

Dear Sir/Madam,

### **East Hampshire Draft Local Plan 2021- 2040 (Regulation 18)**

Thank you for the opportunity to comment on the above. Waverley Borough Council wishes to make the following comments.

#### Cross Boundary Issues

The Council agrees that the strategic cross boundary issues that are set out in your Duty to Cooperate Framework 2022 remain relevant.

- Meeting identified housing needs within the District and wider unmet housing needs
- Meeting the identified need for Gypsy, Traveller and Travelling Showpeople accommodation within the District and wider unmet needs
- Consideration of the potential need for transit accommodation for Travellers (with regards to travelling routes across districts/boroughs).
- Transport impacts and mitigation from proposed development
- Responding to the Climate Change Emergency.
- Flood risk (from all sources)
- Mitigation strategy for the Wealden Heaths Phase II SPA
- Infrastructure requirements and provision; particularly in relation to education, health, drainage, wastewater, and water supply

#### Responding to the Climate Emergency

Waverley Borough Council declared a climate emergency in 2019 and aims to become a net-zero carbon Council by 2030. The Council considers that climate change mitigation and adaptation should be at the heart of preparing a development plan to contribute to meeting environmental and sustainability objectives. Therefore, Waverley supports East Hampshire's proposals for its local plan to tackle climate change and avoid any net increase in greenhouse gas emissions from development. Waverley welcomes your local plan's approach to promoting net zero development. It balances cross-sectoral aligned stringent standards with clear planning obligations which supports applicants in delivering Net Zero in operational terms and lowered embodied carbon on site. This statutory approach will provide the basis for new development to work towards 2050 Net Zero carbon budgeting targets for development delivered under the policies.

However, whilst Waverley has no comments on the Local Plan policies as currently drafted, it also notes on page 48 of your Local Plan that policies CLIM1 and CLIM2 were written after the government's statement on Local Energy Efficiency Standards in December

2023. Waverley appreciates that East Hampshire will consider the implications of the statement for the policies in the Local Plan alongside the responses to the consultation on them, in determining how to revise them. However, Waverley requests that this council is then given the opportunity to comment on revisions to the policies when the modifications to the local plan are made.

### Policy S1 Spatial Strategy

Waverley has been clear with East Hampshire on the preparation of your draft Local Plan that it will not be able to meet any unmet housing need, including for traveller accommodation, from neighbouring local authorities. This is due to the constraints to development in the Waverley which makes it particularly challenging to meet its own assessed needs.

Waverley therefore welcomes the commitment in Policy S1 to provide for the delivery of at least 9,082 homes which at 478 homes per annum accounts for both your local housing need but also for the 14 homes per annum that are estimated cannot be met within the East Hampshire part of the South Downs National Park because of the latter's landscape sensitivity. Waverley also welcomes the proposal to allocate land for 3,500 homes in Policy H1, 643 homes more than the amount that is required to allocate, as a contingency against under delivery and to meet any unmet need from other neighbouring authorities.

However, whilst Waverley welcomes the policies on "bricks and mortar" housing, it also notes that whilst Policy SP1 seeks to provide for 2 permanent pitches for Gypsies and Travellers and 12 permanent plots for Travelling Showpeople, it does not seek to allocate sites to meet all the 66 Gypsy and Traveller pitches and 47 Travelling Showpeople plots identified as being needed in your Gypsies, Traveller and Travelling Showpeople Accommodation Assessment. It leaves the residual number of pitches to be met through permitting sites that accord with the criteria-based Policy H7; Gypsies, Traveller and Travelling Showpeople. As you will be aware from Waverley's duty to cooperate response in August 2023, although sufficient provision has been made within Waverley Borough Local Plan Part 2 to meet the need arising from the gypsy and traveller community within Waverley during the plan period (up to 2032), there is insufficient surplus to be able to accommodate any unmet need arising from East Hampshire.

### Site allocations

Waverley is aware that there are site allocations for development near our Borough. In particular, the site allocated in Fullers Road, Holt Pound for 19 dwellings (HOP1) is very close to our mutual boundary. Waverley recognises that local residents have concerns about highway safety and the capacity of infrastructure in this Borough to support the development. Waverley appreciates that the details of the developments on the allocations will be a matter for consideration through any planning application. However, Waverley requests East Hampshire fully address the potential of any impact of allocating the development sites on the amenities and the provision of facilities for our communities in Waverley.

This is an officer response prepared in liaison with the Council's Portfolio Holder for Planning and Development.

Yours faithfully,



Team leader (Local Plans and Planning Policy)

Winchester City Council response – entered on Commonplace

ID 65e1a4e96595d10008eb7495

## **Homes for All**

### Policy H1 Housing Strategy - What are your comments on this policy?

Thank you for the opportunity to comment on your Draft Local Plan 2021-2040 Consultation. The City Council has the following comments to make on the Draft East Hampshire Local Plan.

EHDC's draft Local Plan allocates sites for approximately 3,500 dwellings, which is about 640 dwellings more than its housing requirement after taking account of expected unmet needs in the SDNP part of its District.

WCC supports the EHDCs dwelling surplus but notes that these are not assigned to addressing specific PfSH housing unmet need. The PfSH Spatial Position Statement indicates that East Hampshire is an authority that should be able to meet and potentially exceed its standard method-based housing need. In light of this, the City Council would suggest that the supporting text could be altered to specifically state that surplus (unmet need allowance) should be retained and if possible increased and allocated to meet unmet needs from adjoining PfSH areas in the supporting text of paragraph 9.19.

Through work on developing a Statement of Common Ground, both authorities agree that there is no unmet housing need arising from either authority on which it is seeking assistance from the other.

### Policy H7 Gypsies, Travellers and Travelling Showpeople Accommodation - What are your comments on this policy?

Our understanding is that the assessments is based on the 2020 GTAA and is this is in the process of being updated currently, to align with the plan period.

We note that EH has formally responded to us to confirm they are not in a position to assist us with our Gypsy and Traveller need. And any update to the SCG will need to take into account the findings of EHDCs updated GTAA.

## **Responding to the Climate Emergency**

### Policy CLIM1 Tackling the Climate Emergency - What are your comments on this policy?

Thank you for the opportunity to comment on your Draft Local Plan 2021-2040 Consultation. The City Council has the following comments to make on the Draft East Hampshire Local Plan.

As a local planning authority that has also declared a climate emergency, Winchester City Council's (WCC) supports East Hampshire District Councils (EHDC) ambition to achieve net-zero carbon development by 2035. WCC supports Policy CLIM1 which uses the Energy Use Intensity (EUI) metric to calculate space heat demand and total energy demand. WCC also supports the implementation of an energy hierarchy in policies CLIM1, CLIM2 and DES1. WCC looks forward to working together with

EHDC in light of the Written Ministerial Statement on energy efficiency standards to ensure that we pool our joint resources to support each other on this key policy area.

The only comment we would make in regards to CLIM1 is criteria d. which states all heating requirements should be met without on-site use of fossil fuels. While WCC acknowledges the intent behind this criterion, we propose a reconsideration of its wording. Presently, the criterion exclusively addresses heating needs, potentially implying that off-site fossil fuel usage is permissible. We question the necessity of specifying "onsite" in this context. We wondered if there was the need for the word onsite. WCCs Policy CN3 criteria 4 states that Onsite renewables to provide 100% of the energy consumption that is required by residential buildings, for example through the installation of photovoltaic solar panels or other suitable forms of renewable energy generating schemes that are appropriate for the location or the setting.

Policy CLIM2 Net-Zero Carbon Development: Operational Emissions - What are your comments on this policy?

While WCC understands the need to not be overly prescriptive in the CLIM2 criteria, WCC would suggest that citing examples of operational energy modelling for the Sustainability Statement in the supporting text, some suggestions could be offered such as PHPP or CIBSE.

Policy CLIM3 Net-Zero Carbon Development: Embodied Emissions - What are your comments on this policy?

WCC supports CLIM3 Net-Zero Carbon Development: Embodied Emissions, and WCC will be including a policy on this for WCCs Reg 19 draft Local Plan.