

Responses from East Hampshire Parish and Town Councils

East Hampshire Draft Local Plan 2021-2040 Reg18, 2024

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*Both Four Marks Parish Council and Medstead Parish Council submitted the response by 'Medstead & Four Marks Neighbourhood Plan Steering Group' in their own response. As such it isn't duplicated in this document and is included once within the response from Four Marks Parish Council.



ALTON TOWN COUNCIL

EHDC LOCAL PLAN REGULATION 18 (2024) RESPONSE

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1.0 Introduction

- 1.1 This document is being submitted by Alton Town Council in response to the East Hampshire District Council Local Plan 2021- 2040) Regulation 18 consultation (2024).
- 1.2 The new Local Plan 2021-2040 will cover the areas in East Hampshire outside of the South Downs National Park Authority. The SDNP area is covered by the South Downs Local Plan which was adopted on 2 July 2019 and is currently in the initial stages of review.
- 1.3 This response considers the proposed spatial strategy for the emerging plan, the settlement hierarchy and its application and consequences for Alton. It also addresses the proposed site allocations as well as selected other draft policies, informed by the work of Alton Town Council (ATC) including its response to the Climate Emergency and the on-going review of the Alton Neighbourhood Plan (ANP)
- 1.4 This response also reviews the supporting evidence bases to ensure they are robust and support the rationale of the proposed site allocations contained within, to support the requirement for the EHDC Local Plan to be considered to be positively prepared, justified, effective and consistent with national policy as it moves to the next stage in preparation.

2.0 Background and Context

EHDC emerging Local Plan

- 2.1 There have been three previous Regulation 18 consultations for the emerging Local Plan, two held in 2019 and one in early 2023. The first Regulation 18 in 2019 sought, in terms of spatial strategy, to deliver a number of “local” sites together with Northbrook Park at Bentley and Whitehill/Bordon forming the two main “strategic sites”.
- 2.2 The second consultation, also in 2019, focused on 10 potential strategic development sites. This included two sites of direct relevance to Alton, Chawton Park Farm and Neatham Down.
- 2.3 Subsequently, EHDC Full Council on the 23rd September 2021 sought Members approval for the preferred site allocations option for the emerging Local Plan in order to proceed to the Regulation 19 consultation. Members were requested to approve one of the sites near Alton (Option 2)

“Chawton Park Farm” as its preferred option. It was, however, determined at that meeting that further work was requested on all sites and thus no preferred option was approved.

- 2.4 On the basis of its inclusion in this current Regulation 18 it is worth noting that in respect of the other site near Alton proposed at that time, Neatham Down (Option 3), the report to Full Council stated that this location was not recommended:

“Potential adverse impact on the landscape of the Wey Valley and the setting of Alton have been identified in respect of the site at Neatham Down, whilst there are concerns that the A31 – as a physical and psychological barrier – would hinder the integration of a new community with Alton”

- 2.5 EHDC subsequently halted the Local Plan process in summer 2022, restarting with a Regulation 18 Issues and Priorities paper in late 2022. This consultation asked for views on high level principles over where to distribute or concentrate new housing. The current Regulation 18 consultation indicates that the preferred spatial strategy is Option 2 - *“Concentrate new development in the largest settlements with more facilities and services”*

- 2.6 The other options were 1) disperse growth over a wider range of settlements, 3) distribute new development by population and 4) concentrate development in a new settlement or in a large urban expansion to one or more existing settlements.

Alton Neighbourhood Plan review.

- 2.7 There has been a period of considerable growth in Alton over the last ten to fifteen years. The previous EHDC Local Plan (JCS,) set out a requirement for 1,731 homes in Alton through the plan period of 2011 and 2028. When the original Alton Neighbourhood Plan was made in 2016, a minimum of 700 additional homes was required over the 1,031 either already built out, with permission or anticipated as windfall. At that time the Neighbourhood Plan allocated 1,027 against that 700 target, to ensure a good buffer, with further allocations made in the modified Alton Neighbourhood Plan (2021) totalling a further 305 homes (so in total 1,332) This figure was found to be in general conformity with the JCS.

- 2.8 Despite recent developments, the built-up area remains relatively contained in Alton within an area about 3 kilometres long and 2 kilometres wide. The built environment consists of four elements, namely: central older areas; outer residential areas; industrial areas; and Holybourne

village. Alton is set within a distinctive chalk landscape setting, at the source of the River Wey. It sits relatively hidden in a hollow, which is encircled by sloping downland that provides a green skyline. Immediately to the south-west is the northern edge of the South Downs National Park.

- 2.9 The Town Council approved a full review of the Alton Neighbourhood Plan in February 2023. A community led Steering Group (ANPSG) has met every two weeks since, gathering evidence, engaging with the community and subsequently writing the new plan. The draft introduction states:

“In summary, Alton residents respect the need for growth, but wish to retain the individual characteristics and heritage of the Parish. While further housing will be necessary, key elements to be considered must be maintenance of the town setting, protection of the environment and the development of infrastructure and services”.

- 2.10 It was agreed by the ANPSG that the town and potentially the town’s environs, would continue to be a focus for some future growth as a principal town in the settlement hierarchy, required by EHDC to take further housing development.
- 2.11 With no early indication of likely housing numbers from EHDC, the ANPSG, assisted by their consultants (ONH), considered scenario planning as part of the review of the neighbourhood plan, looking at the different ways the town could evolve in the longer term, to inform a choice about which development path to take.
- 2.12 Each scenario was framed as distinct and plausible, enabling more complex issues to be mapped and compared, which is particularly useful when exploring the relationship between settlement growth and the capacity and distribution of its current supporting infrastructure.
- 2.13 Its primary driver was answering the question “what will serve Alton well”? So much development over the preceding decade had not delivered the improvements to services, facilities and infrastructure which were required and this method of considering growth focused on addressing this, rather than being driven by an arbitrary number which leads to choosing the least worst options without considering the bigger, longer-term picture.
- 2.14 Once identified, these cumulative scenario options were tested with the community at the September 2023 drop-in sessions. The feedback, indicated that there was community opposition to scenario 3 (c.800) which included development in Holybourne of around 200 plus the development numbers from scenario 1 and 2. There were limited responses to the other options which were, Scenario 1 - c.400 homes (Brownfield sites) Scenario 2 - c.600 homes

(Brownfield plus land to the west of the town) and scenario 4, - c.1700 homes (Brownfield, Land to the west, Holybourne and to the south of the town)

- 2.15 EHDC feedback to the scenario planning was supportive of scenario 1 in principle but felt there was insufficient evidence to support the numbers proposed, had little comment on scenario 2, was supportive of scenario 3 relating to Holybourne but had landscape concerns over the South Alton element of scenario 4.
- 2.16 Subsequently, EHDC indicated to the ANPSG in October 2023 that the emerging Local Plan housing target for Alton would be 1,700, of which 1,000 would come from a strategic “satellite village” site outside of the Neighbourhood Plan boundary at Neatham Down, with a further c.260 from three other sites, Brick Kiln Farm (150), Beech (90) and Travis Perkins (20) of which the latter two fall outside of the Alton boundary.
- 2.17 The ANPSG had concerns over the likely constraints of a satellite village, given it would create a car dependent community, disconnected from the existing town and would need significant infrastructure within the site which would not benefit the wider town.
- 2.18 As such, the ANPSG sought to consider whether the Alton Neighbourhood Plan scenario 4 could, with some adjustment on locations, (likely to exclude Holybourne) provide a solution in order to negate the need for a satellite village workshopping the proposed scenario and commenced engagement with land promoters to discuss the infrastructure requirements needed in order to deliver the sites. This would then be used to prepare justified draft site allocation policies to include for testing with consultees through the statutory Regulation 14 consultation for the Neighbourhood Plan, scheduled for April 2024.
- 2.19 EHDC officers have indicated their concern about the Neighbourhood Plan progressing in this way and seeking to consider the full allocation, recommending that the Neighbourhood Plan only considers sites within its boundary of up to 700 (or a lower number leaving the Local plan site allocates the sites Brick Kiln Lane, Travis Perkins and Beech), or allocates no housing at all with EHDC allocating the full 1,700. They have further advised that the group of sites around South Alton should not be considered by ANPSG as these would be deemed to be a strategic allocation and thus only able to be included within the Local Plan.
- 2.20 EHDCs attention is drawn to the [inspectors report](#) for the South Oxfordshire District Council Core Strategy as it related to the Thame Neighbourhood Plan. The core strategy was modified in order to *“delete the strategic allocation and devolving the task of identifying sites for all of the town’s growth to the Thame Neighbourhood Plan”*.

- 2.21 The response by EHDC to direct the ANP to either promote no housing or a restricted choice of sites could be seen to pose a threat to the “integrity and freedom”¹ of the neighbourhood plan process through restraining the ANP from allocating where it believes best serves the local community.
- 2.22 The ANPSG believes that the neighbourhood plan being asked to allocate up to 700, does not work for Alton alongside a new “village” allocated by EHDC. With the sites available, it is an insufficient housing number to be viable for developers to provide the infrastructure and community facilities required for the town which can only be realised with delivery at scale. Furthermore, Scenario 1 (Brownfield) would be undeliverable in the numbers originally conceived if a satellite village went ahead as this option relied upon redevelopment of some of the parking areas in the town centre with a greater a focus on active travel, which is not possible if creating a car dependent community of up to 1,250 homes on the outskirts of town.
- 2.23 As such the Neighbourhood Plan Steering Group will be meeting with officers of EHDC before the end of February to consider the future of site allocations from the Neighbourhood Plan as with the constraints they have been told to work within, the result would just be more housing for Alton and little or no supporting infrastructure, which would not be supported by the community at referendum.

3.0 EHDC Regulation 18 Consultation Local Plan

- 3.1 ATC wishes to raise objection to the draft Local Plan as presented. The explanation for the objection is detailed below but the focus is concentrated on the following areas:
- The incorrect placement of Alton as a stand-alone tier one settlement
 - The resulting distribution of housing numbers across the settlements
 - The overall quantum of housing advocated in the plan
 - The inclusion of a 22% buffer without justification
 - The omission of capacity testing to obtain the numbers on each proposed site
 - The lack of brownfield first approach

Spatial Strategy.

- 3.2 EHDCs Planning Policy Manager recently stated² “*As planners we should concentrate development in the higher order settlements to encourage that modal shift so new residents can use walking and cycling to access those everyday facilities that they use.*”

¹ <https://www.southoxon.gov.uk/wp-content/uploads/sites/2/2021/06/Inspectors-final-report-Core-Strategy.pdf> (Para 55)

² EHDC Planning Policy Meeting 10th January 2024

- 3.3 This reflects the principle set out in S1.4 that the spatial strategy should be *“To concentrate the greater proportion of development in the larger and more sustainable settlements”*.
- 3.4 From this principle it logically follows that Alton, Whitehill/Bordon, Horndean and Liphook would take the bulk of the required housing development, most effectively achieved through intensification of existing town centre sites, which are the most accessible, making best efforts to use previously developed land before looking to greenfield sites. The NPPF is clear that substantial weight should be given to reuse of previously developed land.³ This “brownfield first” approach was also supported by Alton residents during the Alton Neighbourhood Plan informal engagements sessions in 2023.
- 3.5 The government recently announced that every council in England will be told that they will need to prioritise brownfield developments and instructed to be less bureaucratic and more flexible in applying policies that halt housebuilding on brownfield land.⁴ The EHDC Local Plan does not currently appear to provide evidence that this approach has been taken.
- 3.6 It is further noted in the current EHDC register of local brownfield land the council has not put any sites on Part 2 of the register. Granting permission in principle (PiP) for appropriate sites is a useful tool designed to speed-up smaller housing-led development and de-risk the sites helping to bring forward housing in these areas and should be utilised wherever appropriate.
- 3.7 The preferred spatial strategy must also consider this concentration of development in higher order settlements in terms of what will serve the existing community well to provide infrastructure solutions through housing delivery, which will benefit the existing as well as new communities, providing an integrated, well-connected community, which will continue to thrive through support for local services including long term vibrancy for town centres.
- 3.8 This effectively applies the principles of sequential testing to determine where development should be located, assessing of all of the brownfield and comparable deliverable and developable LAA sites within the town centre, then within the settlement boundaries before considering sites outside SPBs but within the Neighbourhood Plan boundary and only then sites beyond, as by definition the further out from the town centre sites are located, the less sustainable and accessible they are likely to be.

³ <https://commonslibrary.parliament.uk/research-briefings/cdp-2023-0035/>

⁴ <https://www.gov.uk/government/consultations/strengthening-planning-policy-for-brownfield-development>

- 3.9 ATC is concerned that whilst concentrate development in the higher order settlements is an appropriate approach, there is little evidence that the current spatial strategy considers brownfield first and therefore the Plan may not be consistent with national policy or justified.

Settlement Hierarchy & Housing Requirement.

- 3.10 In respect of the distribution of proposed development across the settlement hierarchy, ATC is concerned over the justification given for Alton to take 1,700 homes. It is only the latest revision of the settlement hierarchy which sets Alton apart from the other large settlements in the district, all previous hierarchy methodologies employed set it alongside Whitehill/Bordon and Liphook.
- 3.11 In total the three tier 2 settlements are required to take 1,098 compared with Alton as the single tier 1 taking 1,700. There is no justification for this pattern of distribution across the higher level settlements, which appears to disproportionately attribute development to Alton.
- 3.12 It is also inconsistent with previous approaches taken by EHDC in respect of Bordon/Whitehill in particular. The town is described as having a relatively large range of facilities and services for local residents. *“However, an even greater range of local facilities and services will be delivered through the development of a new town centre as part of regeneration activities.”*(Page 368)
- 3.13 Cryptically, it is stated that EHDCs view on *“the amount of additional new homes that should be delivered at Whitehill & Bordon has changed over time”*, whilst local publicity congratulates the transformation of the town into a [sustainable green, healthy and connected town](#), which has received [over £34m from the LEP](#) to fund infrastructure improvements in addition to the multimillion point [S106](#) legal agreement signed in 2015. Contained in the draft plan is evidence of work undertaken to identify what further infrastructure works would be required with further development, yet there is no evidence of such detailed analysis for Alton.
- 3.14 There is information missing from the evidence base to explain how the proposal set out in the 2019 larger sites consultation for [1,257 additional homes in Bordon](#) has been more than halved. It is stated that compared to other sites the Gibbs Lane/Oakhanger Road site (LAA/WHI-021) has not performed well within the Accessibility Study. Clearly this depends on which sites it is being compared to, yet its average score is the same as Neatham Down, with its minimum score higher than Neatham Down.
- 3.15 Overall it is therefore unlikely that the plan would currently be found to be sound based on the information presented.

- 3.16 ATC would agree with the approach that the settlement hierarchy methodology takes, emphasising accessibility and living locally, “*Sustainable locations in the district are informed by the settlement hierarchy, which is based on a methodology of reducing carbon emissions from the transport sector, the largest contributing sector to carbon dioxide (CO2) emissions in the district*”
- 3.17 However, the only proposed strategic allocation in the Plan is situated in an inaccessible location. This is therefore is not consistent with the application of the methodology and scores low on the accessibility score contained with the [East Hampshire Accessibility Study](#) with a minimum score of 4. (The maximum accessibility score is 58.6 and the median accessibility score for the district is 4.9)
- 3.18 As a technical note, site LAA/AL- 060 Holybourne does not appear in the accessibility appraisal. It does include LAA/AL-034 which was the larger Holybourne site which is no longer available. The report should therefore be updated to reflect the current position in terms of land availability.
- 3.19 In calculating the required housing number for the district, the updated NPPF states that the standard methodology is an “*advisory starting point*” (para 61). The supporting evidence base provides a clear direction in terms of use of the standard methodology and its application for the LPA. The [East Hampshire Technical Note September 2023](#), concluding that there is no exceptional circumstances to justify using an alternative method to calculate housing need.
- 3.20 This consultation identifies a need for a minimum number of 9,082 dwellings over the plan period (2021- 2040). (8,816 plus 266 unmet need from the SDNPA) As of 31 March 2023 part of this minimum requirement was already made up of 940 net completions and existing planning permissions totally 3,965 new homes, with a windfall allowance of 1,320, leaving a requirement for a further minimum of 2,857 new homes plus appropriate buffer.
- 3.21 ATC would question why a buffer of over 22% has been included, (in addition to meeting the unmet need from the SDNP) and appears excessive at 643 homes, resulting in a housing requirement figure of 3,500. Whilst the background paper notes the longer term potential unmet needs of the wider South Hampshire sub-region, this is not quantified and therefore lacks justification. Any buffer needs to be proportionate to the degree of risk, with a significant buffer indicates a lack of confidence over deliverability of sites chosen within the Plan. A buffer of 10% would reduce the overall requirement by some 358 homes over the plan period.

- 3.22 Capacity testing. The EHDC Policy team have indicated that the figures stated in the LAA should not be relied upon, which calls into question the degree of accuracy in the proposals. By way of evidence, in Alton, the LAA site at Holybourne (LAA/AL-060) is tabled as having a capacity of 101. This is 100% below the figure publicly stated by the site promoters at 223. The proposed allocation at Brick Kiln Lane (LAA/AL-005) is stated at 150 yet the site promoters have confirmed their figure of 225. The sites comprising the land at known locally as “South Alton” (LAA/AL-056 Land North of A31) is stated on the LAA as 650, yet the site promoter responded to the previous Issues and Opportunities Regulation 18, stating up to 1,100 in total and 920 across the corresponding LAA sites. The site at Neatham Down (LAA/BIN-011) is stated as 1,000 but the site promoter is stating 1,250.
- 3.23 Therefore, firstly the desired “buffer” is likely to already exist within the emerging sites as demonstrated in this sample of four LAA sites but secondly, the lack of clarity over capacity testing may be resulting in surplus allocations being made, against the stipulated requirement.

Transport Study

- 3.24 This background paper does not provide sufficient information to enable consultees to form a view on transport impacts of the proposed site allocations. Whilst it assesses in high level terms, the impact of proposed development, particularly strategic sites, this information should be available at the earliest possible opportunity to help de-risk potential allocations moving forward and demonstrate positive preparation of the emerging plan. Whilst transport assessments are *“an iterative process and become more refined and detailed as the process draws to a conclusion”*⁵, the PPG is also clear that transport assessment should be undertaken throughout including as part of the initial evidence base (issues and opportunities) and part of the options testing as well as in the preparation of the final submission.
- 3.25 The [PPG](#) is clear that the key issues and outcomes should include assessing where alternative allocations or mitigation measures would improve the sustainability, viability and deliverability of proposed land allocations (including individual sites) provided these are compliant with national policy as a whole. The evidence presented does not even detail how traffic as a whole will move through the network with the cumulative impacts once the proposed housing number for the district is built out.
- 3.26 HCC LTP4 places emphasis on integrating land-use and transport planning, to enable sustainable travel choices and reduce the need to travel in the first place., with walking and

⁵ [PPG Transport Evidence Bases in Plan Making and Decision taking](#)

cycling prioritised as transport modes that should be the first choice for shorter journeys. However, It is impossible to inform sustainable approaches to transport at a plan making level without knowing the likely transport impacts of existing and proposed development or assessing where alternative allocations or mitigation measures would have.

Integrated Impact Assessment (incorporating SA/SEA)

- 3.27 *Sustainability appraisal and strategic environmental assessment are tools used at the plan-making stage to assess the likely effects of the plan when judged against reasonable alternatives⁶*
- 3.28 As prescribed, the SA Report must be published for consultation alongside the draft plan that essentially ‘*identifies, describes and evaluates*’ the likely significant effects of implementing ‘the plan, and reasonable alternatives. The report must then be considered alongside consultation responses when finalising the plan.
- 3.29 It is the view of ATC that this IIA does not adequately address the matter of “reasonable alternatives” for two reasons; firstly, the consideration of reasonable alternatives to the preferred spatial strategy option, “*Option 4 scores the least favourably in sustainability terms overall, with a new settlement expansion predicted to result in adverse effects across a number of objectives, including biodiversity, accessibility and emissions reductions, health, landscape, natural and water resources and economic growth.*”, yet the proposed strategic allocation for Alton is effectively an option 4 spatial strategy through the creation of a new settlement. There also appears to have been no assessment of reasonable alternatives within Alton which could cumulatively supply a similar quantum of housing in order to satisfy the housing requirement within the option 2 model.
- 3.30 Secondly, in assessing the reasonable alternatives, Appendix F & G evidence the high level assessments undertaken yet there is no obvious explanation as to how the scoring was considered and the weight given to the various objectives at this screening stage. The indication is that all bar three LAA sites in Alton, detailed in Appendix H, were rejected with no rationale and does not assess these three any further on the basis that they would fall within the Alton Neighbourhood Plan area. In view of one of the recommended options to the ANPSG being to not allocate with the ANP area at all, sites may subsequently be included within the Regulation 19 which had not been assessed at this stage. The evidence for demonstrating consideration of reasonable alternatives is not therefore sufficiently robust.

⁶ <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

- 3.31 There should be appropriate evidence supplied in the form of an assessment confirming why the chosen sites are ‘more appropriate’ than other comparable sites, set out in terminology that can be easily understood.

Proposed Site Allocations

- 3.32 As previously stated, there is concern that there is little evidence on any brownfield first approach, a lack of accuracy over site capacity and sufficient evidence to the rational for discounting sites. *This evidence needs to inform what is in the plan and shape its development rather than being collected retrospectively.*⁷
- 3.33 In consideration of the proposed sites which have been selected, ATC provides the following comments:

ALT1 – Land at Brick Kiln Lane Alton (LAA/AL-005)

- 3.34 This site has been considered by the ANPSG (part of scenario 2) and as such has been subject to engagement with the site promoter and workshopped by the Alton Neighbourhood Plan Steering Group with the following outputs:
- 3.35 The site has as indicative capacity on the LAA of 150; the landowner has proposed a quantum of 225.
- 3.36 Any site allocations policy will need to include a requirement for highways infrastructure improvements in the form of a new 4 or 5 arm roundabout (the 5th arm potentially required for the proposed site ALT4 should this be confirmed as an allocation.)
- 3.37 Attention is drawn to the drainage issues currently experienced on the sunken lane (Brick Kiln Lane) from the farmed land to the north and where it currently drains into surrounding land.
- 3.38 There is also flooding in the area located around the proposed site entrance which would need to be mitigated (SUDS or other alleviation proposal)
- 3.39 The site is located at the entrance to the town from the Basingstoke direction and as a key gateway into Alton it is important that the build line is discretely set back from A339 so as not to create a hard development line on the approach to the town.

⁷ <https://www.gov.uk/guidance/plan-making> 038 Reference ID: 61-038-20190315

- 3.40 The site contains a number of TPO trees. To the west and north of the site is woodland identified as part of the network enhancement zone on the ANP Green Infrastructure Map. Built development should provide a buffer zone of a minimum of 50-100m from this woodland. In addition, wherever possible mature trees should be retained on site and where new planting is required, mature trees of scale are planted to break up the built environment.
- 3.41 Development on the site should continue to follow the northern edge of the original Will Hall Farm built form, (around 120m contour line) and wrap around the site rising slightly (but not exceeding the 130m contour line) to maintain the landscape setting.
- 3.42 Pedestrian and cycle routes into town and towards Beech should be improved with the introduction of a safe crossing point to enable walking and cycling to the western end of town to access school/hospital/GP/recreational facilities including the skatepark and Leisure Centre.

ALT2 - Chawton Park Surgery (LAA/AL-037)

- 3.43 This proposal is supported by ATC and a policy is included within the ANP.
- 3.44 However, given its location at the western end of the town, the surgery will remain largely reliant on access by car, which constrained its scope for expansion as the car park will need to be retained and potentially extended to accommodate additional patients.
- 3.45 With the proposal to allocate 1,700 new homes for Alton there is a question over whether the site is sufficiently able to support the additional c3,500 people, in the knowledge that Wilson Practice is already 2,787patients oversubscribed (operating currently at 111%) and this is prior to the increase in patient numbers resulting from the current developments which have yet to be completed.

ALT3 – Land Adjacent to Alton Sewerage Treatment Works (LAA/AL-058)

- 3.46 The Town Council would support the inclusion of this site for an extension to the waste-water treatment use adjoining it, in order to increase capacity in this location.
- 3.47 There is no justification to allocate this site for more generic employment uses, which are not required given the proximity to ALT6 and the likely environmental issues of smell and/or noise for adjoining users.

ALT4- Land at Whitedown Lane (LAA/BEE-010)

- 3.48 This site is located outside of Alton in the neighbouring parish of Beech although, given its proximity to the town, would rely upon it for services and facilities. Alongside the proposed development on the other side of the A339 at Brick Kiln Farm (ALT1), development of this site could result in a very clear definition to the built environment on this gateway to the town.
- 3.49 The site has a number of similar constraints and opportunities as ALT1. A new arm to any roundabout on the A339 would be required for access. In addition there would need to be improvements to the surrounding area for active travel routes into the town along the A339 and the installation of a crossing point to enable safe passage to the centre of town and the facilities at the western end of the town.

ALT5- Land at Travis Perkins (Mouters Lodge Park (LAA/CHA009)

- 3.50 ATC raised no objection raised to planning application 59923 (response submitted 25th October 2023) for this site. A decision is pending.

ALT6- Land at Wilsom Road (LL/WOR-004)

- 3.51 This site was included on the EHDC Housing and Employment Allocations Plan in 2016. An application in 2016 was refused with an appeal lodged and subsequently withdrawn in 2017. Therefore, EHDC need to be satisfied that this site is both developable and deliverable prior to its inclusion in this Local Plan.

ALT7- Land at Lynch Hill (LAA/BIN-008)

- 3.52 This site has a complex history. There are two outline consents for the site, (49776/003 and 49776/004), an outstanding reserved matters application for the whole of the site (49776/004) as well as an outstanding reserved matters application for site access for pedestrian, cycle and vehicular access to the site from Waterbrook Road (49776/005)
- 3.53 Listed under the constraints and opportunities for this site, the question of access is noted, stating that there is a private track which runs through the site, which connects Golden Chair Farm with the Waterbrook Road which will need to be factored into any reserved matters decision affecting access from the site into Waterbrook Road and how the site is laid out.
- 3.54 It is further noted that it is this privately owned track which would be required to enable pedestrian and cycle access to the proposed site ALT8; without which access to Alton would

be across the A31. It is therefore vital for the delivery of both this site and consideration of ALT8 that there is certainty in the securing of this right of way for public access.

ALT8 – Land at Neatham Manor Farm (LAA/BIN-011)

- 3.55 This site is the sole proposed strategic allocation in the emerging Local Plan. As previously noted, in spatial terms it is more aligned with option 4 rather than the preferred option 2 as it creates a new satellite village. The site promoter is advocating delivery of 1,250 homes on the site.
- 3.56 The site scores poorly overall in the [Living Locally Accessibility Study](#), with one of the lowest minimum scores in the district at a minimum of 4 given its inaccessible location. Residents would be dependent upon the private car, undermining the environmental limb of sustainability as set out in the NPPF 2023, the priorities and objectives of EHDC emerging Local Plan and ATCs response to the climate emergency as well as the aim of HCC’s Transport Plan (LTP4) in creating a prioritising active travel by foot and bicycle.
- 3.57 As noted in ALT7 above, there is a question over potential constraints over the proposed safe route for walking and cycling over the existing third party owned bridge and the relationship of any proposed route through the Lynch Hill employment site accessing out to Waterbrook Road. Without resolution, the site is unlikely to be considered deliverable.
- 3.58 The EHDC [Interim SA Report \(Strategic Site Options\) February 2021](#), stated, in relation to the previous proposal to allocate a site for up to 600 homes in this area
- “this area is close to the South Downs National Park and is considered to be a highly sensitive landscape with a low capacity for development in the Council’s Landscape Capacity Study (2018). An option for employment development was previously considered through the LAA and SA in 2018, prior to the Draft Plan consultation, but ultimately not taken forward for detailed appraisal. Key concerns at the time were in respect of landscape and groundwater flood risk.”*
- 3.59 The EHDC [2018 Strategic Flood Risk Assessment \(SFRA\)](#) identifies the site is substantially affected by areas of groundwater flood risk. As such there is no evidence that reasonable alternatives have not been adequately assessed, not least in terms of sequential testing to identify if there are better options for site allocation.
- 3.60 The [Interim SA \(2021\)](#) states at 8.5.15 that Neatham Down is “peripheral or distant from existing services” its location “*considered to be more problematic ...in terms of the level of*

intervention required to improve accessibility and in terms of the number of existing residents who would benefit from facilities delivered on site.”

- 3.61 Whatever improved to accessibility could be made, parts of the site would remain at least a 30 - 40 minute walk to the middle of the High Street (2km) and more than a 10 minutes cycle and therefore does not accord with the [Manual for Streets](#) recommendations (800m with an upper limit of under 2km)
- 3.62 It is clearly not accessible and in EHDCs own words the A31 *“provides a physical and psychological barrier [and] would hinder the integration of a new community with Alton.”*⁸
- 3.63 There is a real risk of the development becoming, in reality, far removed from the option 2 spatial strategy intention to extend existing larger settlements and will in effect create a new “garden village”. The lack of sustainability of such new settlements is illustrated by the Report [“Garden Villages and Garden Town: Vision and Reality”](#)⁹ This summarises their findings which include these settlements being:
- Car dependent;
- Unlikely to be self-sufficient or self-contained in a meaningful way;
- Good/excellent public transport was wanted and a stated aim but rarely achieved as funding in uncertain; and
- Cycling was underfunded. (This has been a concern voiced previously by ATC the LCWIP is unable to be delivered due to the cost of implementation with no funding through HCC)
- 3.64 It is also likely that a viability assessment which would need to factor in the required infrastructure, local services and elements such as the need for subsidised bus services, would result in an inability to deliver the quantum of affordable housing required locally as part of the ANP [Housing Needs Assessment](#)
- 3.65 In conclusion, ATC would not support the selection of this site for development for the reasons set out above.

Support for Alton Town Centre

- 3.66 ATC is pleased to see a specific policy DM24(Alton Town Centre Uses). However, the proposed area is currently not identified on the polices map, so it is not possible to comment on the

⁸ <https://easthants.moderngov.co.uk/documents/g3773/Public%20reports%20pack%2023rd-Sep-2021%2018.00%20Council.pdf?T=10>

⁹ Foundation for Integrated Transport and Transport for New Homes (Subtitled “The Garden Village Dream Vs. The Tarmac Estate”) (2020).

extent of the area. EHDC have been made aware that the ANP is developing a Town Centre Masterplan (commissioned through Locality with AECOM) which also considers the extend of the primary shopping area as well as considers the opportunities for redeveloping parts of the town centre to improve the mix of uses and introducing more residential spaces to intensity use of this most accessible part of the town.

- 3.67 To support the Alton Town Centre policy, development within Alton should be in a way that is fully integrated with the existing community and supports the town centre in order to benefit the existing businesses located there. ATC therefore agrees with the ‘town centre first’¹⁰ approach to retail and other town centre uses within Alton and welcomes draft policy E5 (5.5) “*Any development that would significantly harm the vitality and viability of a defined centre or small local parade (3 or more units) will not be permitted.*”
- 3.68 As such new developments should not be providing local centres which would deter use of the town centre (ATC objected to the proposed café on the Molson Coors Brewery Site redevelopment, as it would fail this sequential test¹¹ - the proposed café was subsequently withdrawn from the application)
- 3.69 ATC is also keen to ensure the town centre adapts to current trends, which sees high streets being focal points for social interaction and community services with improved public realm spaces. As such the Local Plan, should respond to the need to decrease carbon emissions in the town centre, through policies to improve air quality and canopy cover, restricting HGV vehicles and improving accessibly by active travel modes.

Other Policy Areas of Note.

- 3.70 Climate Change. Whilst supportive of the policies, ATC would like to see the Local Plan go further, where it is able, namely, mandating the use of community energy systems such as CHP or district heating in site allocation policies where they relate to development over a particular size and certainly on strategic sites.
- 3.71 In addition, the need for sustainability assessments post occupancy could be relaxed for developments which are certified passivhaus. This would assist the developer and case officer in not having to monitor and report post occupation and would avoid the performance gap issues experienced once properties are occupied.

¹⁰ <https://www.easthants.gov.uk/media/8743/download?inline> page 268

¹¹ https://planningpublicaccess.easthants.gov.uk/online-applications/applicationDetails.do?activeTab=consulteeComments&keyVal=EHANT_DCAPR_245727&consulteeCommentsPager.page=3

- 3.72 Settlement Policy Boundary. ATC is supportive of the proposed amendments to the settlement boundary. It is noted that in Alton, Site 12 (Cowdray Park) and Site 13 (Salisbury Close) are being reviewed as a potential Local Green Space allocations within the ANP protect them from future development as a valued community amenity spaces.
- 3.73 Design policies are overall supported and the ANPSG has worked with AECOM in the creation of design guidance and codes for Alton which will nuance the design policies within the Local Plan to apply specifically within the Alton Area.
- 3.74 It is noted that in relation to Appendix F of the draft Local Plan (Parking Standards) there should be consideration given to mandating wider dimensions for parking bays where electric charging points are included as part of the design. (up to an additional 30cm) to account for wall and floor mountings.

Summary and conclusions

- 3.75 In summary, ATC is concerned that the draft Local Plan is unable to demonstrate that it meets the tests of soundness.
- 3.76 The plan is not positively prepared, demonstrated through evidence inconsistencies. The identified vision and priorities are not reflected in the selection of the strategic site, which conflicts with the approach of the plan to support enlarging existing higher tier settlements (options 2) yet in reality has sought the creation of a new settlement (option 4).
- 3.77 The selection of the strategic site would be a significant incursion into a valued landscape, without meaningful attachment to the existing town, which would result in funding for infrastructure arising being consumed, in the main, within the site to attempt to mitigate its location constraints. It is therefore inconsistent with the NPPF.
- 3.78 *New communities with poor accessibility encourage private vehicle dependent travel, which undermines initiatives to encourage sustainable transport use in line with net zero objectives and promote healthy lifestyles.*¹² The Local Plan has the opportunity to be outcome focused to enable the aspirations of planning policy priorities to be reflected in the resulting schemes for the delivery of housing. Currently, there is a disconnect between the desired achievements of many of the emerging policies and the likely reality of the adverse impacts of development located where they currently proposed.

¹² https://www.rtpi.org.uk/research/2021/december/the-location-of-development/#_Toc89101909

- 3.79 The location of a new “village” at Neatham Down also leaves open the possibility for gradual and creeping coalescence with Holybourne at a later date, or a larger development with further encroachment into the open countryside.
- 3.80 There is a lack of credible evidence in respect of site allocation numbers. As the site allocation figures are not to be relied upon, with no capacity testing undertaken, it is difficult to see any evidence to support the need for a large strategic site if the draft plan has over supplied, given the examples used earlier in this submission. In addition, there is no evidence-based justification for a 22% buffer to meet an undefined need elsewhere (excluding the SDNP which has already been accounted for)
- 3.81 The plan is purely numbers driven and currently appears to be attributing numbers to sites to hit a target figure, even though no capacity testing has been undertaken and numbers are evidently far removed from those sought by landowners/promoters.
- 3.82 Further, there is insufficient evidence to support the distribution of development across the settlement hierarchy, which sets Alton apart through the demotion of all other towns and the resulting overall percentage of housing the town is required to allocate as a result.
- 3.83 It is the view of ATC that the Local Plan would not be in conformity with the requirement for a plan to be justified.¹³ “*taking into account reasonable alternatives and based on proportionate evidence*” for the following identified reasons:
- 1) A lack of evidence that sufficient endeavors have made to take a brownfield first approach nor seeking to consider Permission in Principle (PiPs) to de-risk smaller brownfield sites.
 - 2) A lack of evidence in the consideration of reasonable alternatives in relation to the IIA and site allocations work, including the omission of any detailed work on Alton sites prior to their rejection.
 - 3) A lack of sufficient evidence in the transport study to support how the overall quantum of development would impact the highways network and no settlement specific mitigation requirements (with the exception of some high level work on requirements for sites at Whitehill/Bordon)
 - 4) No evidence to confirm that any transport impact/capacity work has been undertaken as part of the selection of the sole strategic site; HCC highways should be a proactive planning partner throughout. It is accepted that transport assessments are iterative but should be part of positive planning not reverse engineering.

¹³ https://assets.publishing.service.gov.uk/media/65a11af7e8f5ec000f1f8c46/NPPF_December_2023.pdf Para 35.

- 3.84 In conclusion, whilst many of the policies in the plan are aspirational, they are currently not deliverable, principally due to the way in which the spatial strategy is sought to be implemented. The citing the proposed “new village” strategic allocation in a constrained location, the unjustified quantum of development sought within the Plan and the distribution of the proposed sites across the settlement hierarchy.
- 3.85 It is the view of ATC that as a result, the current draft plan, if taken forward, would fail at examination.

East Hampshire District Council
Draft Local Plan 2021-2040 (Regulation 18 Consultation)

Comments by Beech Parish Council – 20th February 2024

Introduction

This document sets out the comments of Beech Parish Council on EHDC’s draft Local Plan 2021-2040 that was published for public consultation on 22 January 2024.

Beech Parish Council may be contacted at:



Email: clerk@beechpc.com

The comments are confined to those policies and associated information that:

- (i) are directly relevant to the parish of Beech; and/or
- (ii) relate to facilities in the local area that are commonly used by the residents of Beech (e.g. in nearby Alton).

Detailed Comments

Policy CLIM2 – Net-zero carbon development: Operational emissions (page 59)

In clause CLIM 2.4 it is not clear whether the extension of buildings is intended to result in the entire building meeting the emissions criteria set out in clauses CLIM 2.1 to CLIM 2.3, or whether only the extension (and not the original part of the building). We have a concern that modest residential extensions will all be rendered economically unviable (even if technically possible) if the policy requires the entire building to be upgraded.

Policy NBE1 – Development in the countryside (page 90)

We agree with the wording of clause NBE1.1, but it is important that the following words be added to the end of the clause:

“And, in all cases, development will be supported provided that its effect on the surrounding countryside and its intrinsic character and beauty is acceptable.”

It must be clear that development in the countryside should not be ugly or out of place, whatever the circumstances. We have similar wording in our Beech Neighbourhood Plan (Policy BPC02), and it has proved essential.

Policy NBE11 – Gaps between settlements (page 124)

We agree with this policy as drafted. But we strongly object to the proposed boundaries of the defined gap between Alton and Beech shown in the Policies Maps.

Beech Neighbourhood Plan Policy BPC03 (Preventing Coalescence with Alton) forms part of the current Local Plan and defines the gap to be maintained between Beech and Alton, specifically to avoid “reducing the visual and/or physical separation between Beech and Alton or otherwise diminish their separate and distinctive identities”.

The Draft Local Plan proposes to remove from the existing agreed formal gap the following land in Beech parish:

- (i) The 9 hectare proposed housing allocation site ALT4 – Land at Whitedown Lane; and
- (ii) A strip of land at the southern boundary of the proposed housing allocation site ALT1 – Land at Brick Kiln Lane.

The existing formal agreed gap is in our neighbourhood plan made in July 2021. Policy BPC03 in particular was the subject of intense scrutiny by the Independent Examiner, who visited and inspected the gap prior to a hearing in Beech village hall in February 2020. Extracts from the Independent Examiner’s report are:

“Although Beech and Alton are separated by the A339, the A339 might not provide enough of a physical barrier and in any case does not provide sufficient or satisfactory visual separation between the two settlements. The concern about coalescence between Beech and Alton has a firm basis.

Much of the land within the proposed area was described to me at the hearing as forming a “basin”. The topography in this parish is certainly of great importance and a feature of the area. I saw at my visit that the open countryside facing Alton from Beech village is a valued part of the setting of Beech which merits safeguarding.”

For the purpose of that safeguarding, the Independent Examiner went on to recommend the extent of the gap that is shown in policy BPC03. In other words, the existing formal gap (as agreed in 2020 by EHDC) was determined by an independent respected planning professional, in order to safeguard the land concerned along the same lines as is proposed in Policy NBE11.

If planning permission for site ALT4 – Land at Whitedown Lane – were to be applied for now it would be refused because it irrefutably contravenes the current Local Plan, which includes Policy BPC03 of the Beech Neighbourhood Plan, on the basis that it clearly reduces the visual and physical separation between Beech and Alton. It would also clearly fall foul of Policy NBE11 of the Draft Local Plan on exactly the same grounds, were it not for the completely unjustifiable amendment of the gap in the proposed Policies Maps.

Note that in 2019 the developer of site ALT1 – Land at Brick Kiln Lane – commented in the Beech Neighbourhood Plan Regulation 16 consultation that they would not be building on that part of the site that was within the non-coalescence area (due to flooding/drainage issues), and so the existing agreed formal gap need not be amended to take account of any development of site ALT1.

Policy NBE12 – Green and blue infrastructure (pages 126/127)

We strongly support the potential green infrastructure project of creating a New Strategic Semi-Natural Green Space running north and west of Alton: from the Golden Pot through Shalden and Beech to Four Marks (and encompassing all of the SINCs and woodlands including Bushy Leaze Wood and Chawton Park Wood).

To quote from page 54 of the East Hampshire Green Infrastructure Strategy (May 2019), the proposed green space “would help to enhance overall landscape character and address sensitivity from forthcoming development in the northwest of the district.” This would fit well with the vision and objectives of the Beech Neighbourhood Plan.

Policy DES2 – Responding to local character (page 155)

Policy DES3 – Residential density and local character (page 162)

Policy DES4 – Design codes (page 168)

We note that proposed policy DES2 replaces the current retained Policy H10 (Special Housing Areas) of EHDC’s Local Plan: Second Review (2006).

Beech Neighbourhood Plan Policy BPC06 (Development Setting and Scale) and Policy BPC07 (Building Design and Character) include supplementary provisions applicable to Beech – including minimum plot size requirements in our Special Housing Area similar to those found in current retained Policy H10. It is essential that the requirements of BPC06 and BPC07 can continue to apply in addition to the requirements of DES2, DES3 and DES4. We see no obvious conflicts.

Housing Need (page 216)

We are pleased to see that the housing need is now 478 homes per year over the life of the Draft Local Plan, a reduction from the 517 homes per year put forward in the December 2022 “Issues and Vision” consultation.

We note that the shortfall between the total housing requirement and the previously identified supply of housing (including windfall allowance) is 2,857 homes. But we do not agree with the decision to allocate new housing sites comprising 3,500 homes, as that latter figure is driving the need to allocate unsuitable sites such as one in Beech parish, ALT4 – Land at Whitedown Lane.

The ‘buffer’ of 643 homes is 22.5% of the 2,857 unmet housing need, which is excessive. (You don’t need a buffer in respect of existing completions and commitments – which are almost certainly going to be developed – nor, arguably, for the windfall allowance). Even if there is a concern about a shortage of windfalls, then 643 homes is 15.4% of (2,857 + 1,320) – still an excessive percentage. A more appropriate buffer would be c.450 homes (10.8% of new allocations plus windfalls).

Note that these housing need figures and buffer calculations already factor in meeting the unmet housing need of the SDNP. If there is any desire to allocate sites to unmet need from other authorities in the South Hampshire sub-region, these should be specific extra allocations in the Southern Parishes of East Hampshire, as the Alton and Bordon areas are too far from South Hampshire to credibly take that sub-region’s needed. Is ALT1 – Land at Whitedown Lane, or any other Alton housing site for that matter, seriously meant to be a credible option for a Portsmouth resident looking for local housing?

We also understand that the housing need and site allocation calculations reflect the position as at April 2023. The position is likely to change markedly by the time of the Regulation 19 submission consultation, as the lack of a 5-year land supply is resulting in numerous speculative planning applications on new sites, some of which will no doubt be granted. Therefore there are likely to be more ‘Completions’ and ‘Commitments’ in the bag before Regulation 19, which should reduce the

number of new housing allocations needed. We understand and expect that EHDC will be running new calculations at that time, based on up-to-date information.

Policy H4 – Rural exception sites (page 232)

Amend clause H4.1(a) to read:

“there is an identified local need as indicated by the most recent Hampshire Home Choice and as agreed by the Local Planning Authority and the relevant town or parish council”

It is essential that there is local council support for, and agreement to, affordable housing developments on a particular rural exception site.

Policy E3 – Rural economy (page 261)

Clause E3.2 should be amended to make it clear that it is not referring to the conversion of existing commercial or farming buildings into residential accommodation (which EHDC would not be automatically supporting).

Policy DM18 – Residential extensions and annexes (page 310)

This policy as drafted is inadequate. The policy partly achieves its aim that any extensions should “appropriate”, but the tests are subjective and, in cases where extensions are built first and retrospective planning permission is sought later, subjective tests can be glossed over. Also, the proposed policy does nothing to prevent multiple sequential extensions (including those under permitted development rights) that, over time, enlarge properties out of all recognition.

In the past there have been maximum percentage figures by which an original house’s floor area may be increased through one or more extensions. For the largest houses the maximum permitted cumulative increase in floor area was, we believe, 50%. We believe that, as an addition to Policy DM18, a similar set of percentage figures should be adopted by EHDC to limit the cumulative size of extensions (together with annexes). Hard percentage figures will allow EHDC, and planning inspectors, to make clear cut decisions on permissions/enforcements concerning excessive use of extensions.

Policy DM19 – Conversion of an existing agricultural or other rural building to residential use (page 312)

We object to this policy as drafted. The policy is too widely drawn. “Other rural building” can be taken to mean any building outside an SPB. In Beech parish, and in many other villages, there are significant agglomerations of dwellings that are outside SPBs, and the fear is that any outbuilding of such dwellings could be categorised as an “other rural building”. This could give wide opportunity to create new dwellings in the countryside; indeed, new buildings could be created (ostensibly for agricultural business purposes or as outbuildings to dwellings) specifically designed for subsequent rapid conversion to residential use. In this village we have seen instances that look suspiciously like that scenario.

Site ALT1 – Land at Brick Kiln Lane, Alton (page 340)

We have no objections to development of site ALT1 – Land at Brick Kiln Lane - provided that the principles of development that were found acceptable by all parties (the developer, EHDC, Alton Town Council and Beech Parish) present at the online workshop held in June 2021 are followed. That is to say, that the development would be focussed on the eastern half of the site (on the slope facing southeast towards existing Alton housing) rather than on the western half of the site (on the slope facing west towards Beech village). In this way:

- (i) The development stays within the urban ‘Alton section’ of the Wey valley, and does not stray into the entirely green rural ‘bowl’ of the ‘Beech section’ of the Wey valley;
- (ii) The green gateway to Alton, along the A339 from Basingstoke, is preserved; and
- (iii) The “potential adverse landscape and visual impacts” acknowledged in the Draft Local Plan will be mitigated.

We are pleased to see that 150 homes are proposed for this site, a reduction from the number proposed in the Spring 2019 consultation. This should help achieve the principles of development set out above, which would leave the western half of the site as largely open recreational space.

We would **strongly object** to any proposal to develop on the slopes facing west towards Beech on the grounds of:

- (i) reducing the size of the rural gap between Alton’s urban area and Beech village by a significant amount, in a manner that threatens Beech as a distinctive settlement; and
- (ii) introducing a slab of urban housing into the entirely rural landscape that comprises the A339 corridor in the dry valley that contains Beech village.

The western side of the site folds westward around the hillside south of Hungry Copse, intruding into the next, completely rural, dry valley that contains Beech village. That valley forms the rural approach to Alton from the north-west; traffic approaching on the A339 from that direction remains in an entirely rural environment until it reaches the gateway junction of Basingstoke Road and Whitedown Lane, at which point urban Alton abruptly begins. That rural/urban gateway will be maintained only if the western half of the proposed site remains undeveloped. The current view east towards the site from the listed Wyards Farm, just outside Beech village, is shown in Photographs 1 and 2 below. There are no buildings visible. If the western side of the site were to be developed, that hillside south of Hungry Copse would be covered with housing.



Photo 1: Gateway to Alton – View of Basingstoke Road/Whitedown Lane junction from the west

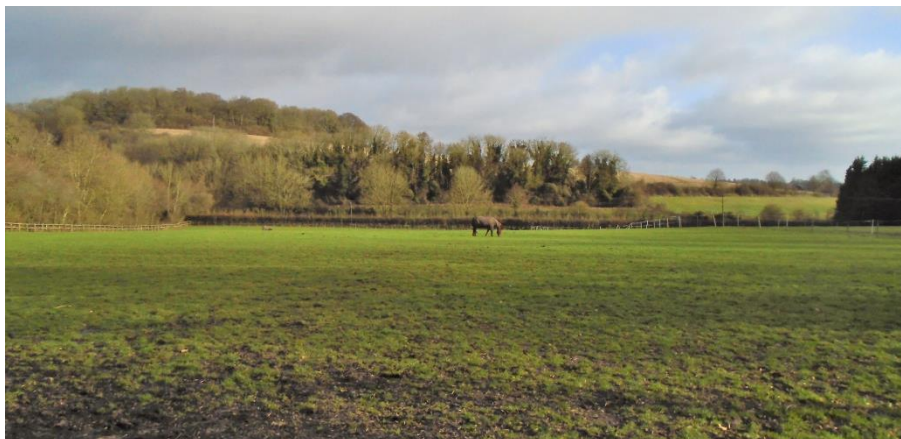


Photo 2: View north-east from Wyard's Farm (Beech) towards Site ALT1 and Hungry Copse

Beech Neighbourhood Plan defines (in policy BPC03) a non-coalescence area between Beech and Alton, where new development will, in general, be restricted in order to maintain the separate identity of Beech village. The non-coalescence area includes all land in Beech Parish outside the village SPB, east and south towards Alton. Beech's SPB is only 700 metres from Alton's current urban area at Whitedown Lane. Development of the western side of site ALT1 would reduce the gap from Alton to Beech's SPB to a mere 450 metres (and the gap to the village's gated entry to only 350 metres), which is miniscule.

Even more importantly, we are seriously concerned that the development of the western side of this site would be a precedent for future arbitrary housing allocations further west along both sides of the Basingstoke Road and north of Ackender Wood (adjacent to Whitedown Lane), thus swallowing up Beech into the west of Alton.

We wish to protect the rural landscape in the Beech valley section of the A339. The 2018 independently produced Beech Landscape Character Assessment (LCA) includes as a "valued characteristic" the "linear, undulating landform with long views to skyline" of the hangers to the east of the A339 Basingstoke Road in Beech Parish.

The LCA also identifies a threat of coalescence with Alton and recommends that Beech should:

- "Maintain individual settlement identity and limit linear expansion and infilling between existing settlements, e.g. Beech and Alton" ; and
- "Retain the undeveloped rural road corridor along the A339 [Basingstoke Road] and important open gaps".

EHDC's Landscape Capacity Study (by the same consultants as the Beech LCA) identifies (in Part 2) that development has the following potential effects on key landscape characteristics of the Beech Clay Plateau (which makes up most of the parish):

- "Loss of characteristic long views from high ground within area across undulating countryside to wooded skylines"; and
- "Impact on rural views from public right-of-way network and rural lanes", both of which would result from the development of the western side of site ALT1.



Photo 3: View north across Site ALT1 to Hungry Copse from the Basingstoke Road/Pertuis Avenue junction

Any development on this site should also:

- Avoid abutting of the development onto Hungry Copse, a SINC, thus removing any detrimental effects on this ancient woodland. Unlike some SINCs in Beech (Ackender Wood, Bushy Leaze Wood) Hungry Copse is not accessible to the public and is not subject to recreational use – a situation that should continue for conservation reasons.
- Leave undisturbed the remains of the route of the Basingstoke & Alton Light Railway, a “Historic Environment” which should be preserved, and which could be developed for the purposes of walking and cycling.

We would support the exit from the site onto the Basingstoke Road taking the form of a roundabout at the junction with Pertuis Avenue. A roundabout here would improve traffic flow at this junction, which becomes congested at peak hours. It would also be easier for traffic to exit from the site at a roundabout rather than from a minor road at a T-junction onto the busy Basingstoke Road.

Also, as part of the delivery of this site it may be possible to deliver the “Connector Road” recommended in the Alton Transport Strategy (2015) prepared by Atkins for Hampshire County Council. The Connector Road would run from the Basingstoke Road/Pertuis Avenue roundabout on the A339, past site ALT1 to the B3349, north of the recently-built Hop Fields Place development. The Connector Road would, in our view, be a significant improvement to the routing of through-traffic around Alton. Currently a high proportion of traffic travelling north on the A339 Pertuis Avenue turns back towards the town centre to access the B3349 at the junction of Basingstoke Road and New Odiham Road. This is because traffic from Alton naturally uses the B3349 to Hook in order to reach the M3 (north) and Reading, rather than proceed to those destinations via the longer A339 and congestion around Basingstoke. The Connector Road will therefore divert a significant volume of through traffic around the Alton urban area from the A339 to the B3349.

Site ALT4 – Land at Whitedown Lane, Alton (page 347)

Beech Parish Council **strongly objects** to any development on proposed “Alton” site ALT4 – Land at Whitedown Lane – which is entirely in Beech parish.

The site falls wholly inside the agreed formal gap between Beech and Alton. This gap is defined by a map in Beech Neighbourhood Plan Policy BPC03 ‘Preventing Coalescence with Alton’, incorporated into the current Local Plan, which states:

“Development will not be permitted in the non-coalescence area shown on [the map] if, individually or cumulatively, it would result in reducing the visual and/or physical separation between Beech and Alton or otherwise diminish their separate and distinctive identities.”

The agreed formal gap first appeared in our neighbourhood plan made in July 2021. Policy BPC03 in particular was the subject of intense scrutiny by the Independent Examiner, who visited and inspected the gap prior to a hearing in Beech village hall in February 2020. Extracts from the Independent Examiner’s report are:

“Although Beech and Alton are separated by the A339, the A339 might not provide enough of a physical barrier and in any case does not provide sufficient or satisfactory visual separation between the two settlements. The concern about coalescence between Beech and Alton has a firm basis.

Much of the land within the proposed area was described to me at the hearing as forming a “basin”. The topography in this parish is certainly of great importance and a feature of the area. I saw at my visit that the open countryside facing Alton from Beech village is a valued part of the setting of Beech which merits safeguarding.”

Photos 1 and 2 show the views from Beech village across site ALT4 to Ackender Wood on the crest of the hill, a wholly rural undeveloped tract of land.



Photo 1: View east from Wyard’s Farm (Beech) towards Site ALT4 and Whitedown Lane



Photo 2: View south from Wyard's Farm (Beech) towards Site ALT4 and Ackender Wood

For the purpose of that safeguarding, the Independent Examiner went on to recommend the extent of the gap that is shown in policy BPC03. In other words, the existing formal gap (as agreed in 2020 by EHDC) was determined by an independent respected planning professional, in order to safeguard the land concerned along the same lines as is proposed in Policy NBE11 of the Draft Local Plan.

The non-coalescence area includes all land in Beech Parish outside the village SPB, east and south towards Alton. Beech's SPB is only 700 metres from Alton's current urban area at Whitedown Lane. Development of site ALT4 would reduce the gap from 'Alton housing' to Beech's SPB to a mere 475 metres (and the gap to the village's gated entry to only 450 metres), which is a significant reduction.

Even more importantly, we are seriously concerned that the development of site ALT4 would be a precedent for future arbitrary housing allocations further west along both sides of the Basingstoke Road, thus swallowing up Beech into the west of Alton. The concept and credibility of a protected mapped gap between Beech and Alton would have been destroyed by the development of site ALT4.

We wish to protect the rural landscape in the Beech valley section of the A339. The 2018 independently produced Beech Landscape Character Assessment (LCA) includes as a "valued characteristic" the "linear, undulating landform with long views to skyline" of the hangers to the east of the A339 Basingstoke Road in Beech Parish.

The LCA also identifies a threat of coalescence with Alton and recommends that Beech should:

- "Maintain individual settlement identity and limit linear expansion and infilling between existing settlements, e.g. Beech and Alton" ; and
- "Retain the undeveloped rural road corridor along the A339 [Basingstoke Road] and important open gaps".

EHDC's Landscape Capacity Study (by the same consultants as the Beech LCA) identifies (in Part 2) that development has the following potential effects on key landscape characteristics of the Beech Clay Plateau (which makes up most of the parish):

- "Loss of characteristic long views from high ground within area across undulating countryside to wooded skylines"; and
 - "Impact on rural views from public right-of-way network and rural lanes",
- both of which would result from the development of site ALT4.

If planning permission for site ALT4 – Land at Whitedown Lane – were to be applied for now it would be refused because it irrefutably contravenes the current Local Plan, which includes Policy BPC03 of the Beech Neighbourhood Plan, on the basis that it clearly reduces the visual and physical separation between Beech and Alton. It would also clearly fall foul of Policy NBE11 of the Draft Local Plan on

exactly the same grounds, were it not for the completely unjustifiable amendment of the gap in the proposed Policies Maps. The proposed site ALT4 is totally misconceived.

Then we come to another fundamental point: are the 90 homes proposed for site ALT4 needed at all?

In our comments on East Hampshire housing need we have noted that a 643 house buffer is being proposed when allocating sites for 3,500 houses against a shortfall requiring 2,857 additional houses. We have argued that a buffer of c.450 houses would be more than adequate, given the number of existing housing completions and commitments, and that the buffer sites should be concentrated in East Hampshire's Southern Parishes given that any unmet housing need from neighbouring authorities is likely to come from the South Hampshire sub-region.

We have also noted that the number of houses needed on newly allocated sites is likely to fall due to the rush of speculative development planning applications currently coming into the system (due to the lack of 5-year land supply).

Notwithstanding those arguments, the proposed wanton destruction of the integrity of the Beech-Alton gap by developing site ALT4 surely cannot be justified merely in order to increase some arbitrary buffer number from 553 houses to 643 houses. If EHDC is looking for an extra housing site to boost its buffer number, surely there must be somewhere (anywhere!) far less damaging than wrecking the integrity of a soundly-based (on topography and landscape grounds), independently-endorsed and formally-agreed strategic gap between adjacent settlements, deemed worth of protection in the current Local Plan?

If EHDC strongly wishes to maintain the allocation of 1,700 houses around Alton, why not delete this misconceived site ALT4 and instead increase the proposed housing at Neatham Manor Farm (site ALT8) from 1,000 to 1,100? The increase will be hardly noticeable and the extra houses will make local services at site ALT8 more sustainable.

Alternatively, housing development could take place on the land to the east of the New Odiham Road, immediately north of the recent Hop Fields Place development, within the Alton civil parish boundary and without impinging on any narrow gap between Alton and surrounding settlements. This site is not included in the LAA but, as it is an obviously suitable site conveniently located for the town's facilities, surely it is incumbent on EHDC to approach the owners to ascertain its availability?

Draft Local Plan Policy Maps

Alton Policy Map

- i) We object strongly to the extension of the Alton SPB around the entire area of the proposed housing site ALT1 – Land at Brick Kiln Lane. Only a portion of that site will be developed, with the rest becoming recreational green space. The SPB should be drawn tightly around the actual housing development, when known, as is normal practice. Including the open space element within the SPB will leave it much more vulnerable to future speculative development proposals.
- ii) We object strongly to the extension of the Alton SPB around proposed housing site ALT4 – Land at Whitedown Lane, as we strongly object to the development of this site at all.

Beech Policy Map

EHDC proposes seven changes to Beech's current Settlement Policy Boundary (SPB):

1. 24 Medstead Road – Realignment of SPB boundary along roadside

We support this minor amendment.

2. 20 Medstead Road (and land to the west) – removal from SPB

We object to the removal of this land from the SPB, for two reasons:

- We believe that it is unfair to the owner(s) of the land in question for EHDC to arbitrarily change its planning status, from within the SPB to outside it; and
- We are content for development (as permitted in an SPB) to take place within this area, subject to compliance with Local Plan policies. The area is on the edge of, but close to the centre of, the village. Infill development here would be more welcome than in many other parts of the village, since the area is close to the A339 and is unlikely to generate traffic that regularly passes through the village centre to access facilities in Alton or further afield.

3. 90 Wellhouse Road – addition to SPB

We support this change to extend the SPB around an existing dwelling. The area should also be added to the Special Housing Area defined in Beech Neighbourhood Plan Policy BPC06 at the next revision.

4. Land at 96 Wellhouse Road – addition to SPB

We support this change to add the rest of the garden land of this property to the SPB. The area should also be added to the Special Housing Area defined in Beech Neighbourhood Plan Policy BPC06 at the next revision.

5. 158 Medstead Road – Realignment of SPB boundary along side of track

We support this minor amendment.

6. 100 – 158 Medstead Road - Realignment of SPB boundary along roadside

We support this minor amendment.

7. Land at 95 Medstead Road – removal from SPB

We object to this change to remove a piece of garden land from the SPB. We believe that it is unfair to the owner(s) of the land in question for EHDC to arbitrarily change its planning status, from within the SPB to outside it.

Note: Beech Parish Council reserves the right to propose changes to the Settlement Policy Boundary in the parish when it next reviews/ revises its neighbourhood plan, following local consultation.

EHDC Draft Local Plan - comments

[REDACTED]@bentleyparishcouncil.gov.uk [REDACTED]@bentleyparishcouncil.gov.uk>

Sun 03/03/2024 17:40

To:EHDC - Local Plan <LocalPlan@easthants.gov.uk>;support@commonplace.is <support@commonplace.is>

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

Dear sir/madam,

Bentley Parish Council have studied the draft Local Plan documents and are largely positive and supportive of the policies and objectives.

We are not supportive of the revised Settlement hierarchy which proposes that Bentley becomes a Tier 3 settlement alongside settlements such as Four Marks, Rowlands Castle and Clanfield. We propose that Bentley is Tier 4.

Documents referenced:

Our Local Plan 2021-2040 (Regulation 18), Part 8, section 12 Site Allocations

Draft Local Plan 2021-2040 (Regulation 18), Revised Settlement Hierarchy, Background Paper, January 2024

Rationale:

1. Tier 4 settlements are generally much larger – Bentley (population 1,400) is categorised alongside settlements such as Four Marks (population 5,600) and Clanfield (population 5,900)
2. Previous rankings place Bentley lower in the tiering – In 2014 Bentley was evaluated at Tier 4 (of 4) described as “other settlements with a settlement policy boundary” and in 2019 as Tier 5 (of 6) described as a “rural settlement”. These evaluations seem very fair and objective. In addition, on previous rankings (Figure 2, Revised Settlement Hierarchy) Bentley scored 4 out of 40 compared to Four Marks at 19 and Clanfield 18.
3. Comparability to settlements ranked lower - Bentley is a small village, some 500 dwellings, with 72 being added since the last Local Plan and a population of 1400. There are limited local facilities: School, Shop, Post Office, Pub, Church, Village Hall. Many of the Tier 4 settlements are of a similar size and have similar facilities to Bentley. Bentley is not unique amongst villages in northeastern Hants in terms of facilities.
4. Bentley is as sustainable as other Tier 4 and 5 settlements - Some points relating to the sustainability of Bentley:
 - Medical: The village surgery and pharmacy recently closed meaning residents need to travel at least to Alton to visit a GP or collect prescriptions. Our GP's and pharmacies are no closer than for many other settlements
 - Retail: Although there is one grocery store in the village and is convenient for small items it is not sufficient for most residents' weekly shop. They have to travel by car to either Farnham, Alton or Bordon to shop, both for groceries and other items. Medstead (Tier 4) and Ropley (Tier 4) both have Post Offices and grocery shops
 - Education: Bentley has an excellent primary school, but so does Medstead (Tier 4), Ropley (Tier 4) and Bentworth (Tier 5)
 - Recreation Grounds: Bentley has a recreation ground, of course, but so do Medstead (Tier 4), Ropley (Tier 4) and Bentworth (Tier 5), not to mention Froyle (Tier 5) and Binsted.
 - Church: St Mary's Bentley is part of a larger benefice, but there are also active churches in Bentworth (Tier 5), Ropley (Tier 4) and Medstead (Tier 4).
 - Sewage: Thames Water (TW) continually tell us that there is headroom (capacity for more dwellings to be connected to the sewage system) for further development, based on their modelling. But this is difficult to justify given the conspicuous pollution overflowing from the Bentley Sewage Treatment Works (STW) into the River Wey. In 2022 the Bentley STW spilled 62 times for a total of

595.90 hours into the River Wey (reference: The Rivers Trust Sewage Map). The raw sewage is having a devastating effect on the ecology of this chalk stream east of Bentley.

- Local Employment: This is identified in the Plan as being important to sustainability. However, in 2015 when Bentley was making its first Neighbourhood Plan, we included an Employment Policy which safeguarded land adjacent to the industrial estate south of the Main Road. During examination the need for further employment land in the village was deemed unviable and the policy was therefore deleted. Subsequently, an application for change of use was allowed on the land and 8 dwellings were built.

5. Bentley is no more/less accessible than other Tier 4 and 5 settlements – Some points relating to the accessibility of Bentley:

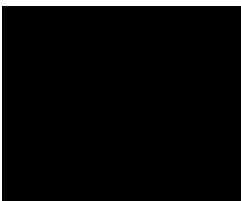
- Bentley is being regarded as a settlement node where residents from other villages will come to use our facilities (such as they are). Realistically, nobody in Froyle or Binsted or even Isington is going to use Bentley as a settlement node by walking or cycling.
- In the report it makes mention of Bentley Station, paragraph 4.12, “Bentley benefits from mainline station”. This appears to be from where much of the scoring for Bentley’s Tier 3 grading comes. Bentley Station is not accessible by walking, or even cycling realistically in 10mins. The station is not in the village, or even in the parish. It is 0.98 miles, or 1.58 km, from Bentley Crossroads. From the Crossroads via Footpath 13 (down Rectory Lane and over the A31 footbridge) it is exactly the same distance. Since accessibility is based on walking or cycling to a destination in 10 minutes there appears to be a contradiction between the Accessibility criteria and the Tiering category: Under the terms of Accessibility, Bentley Station is not accessible from the village.
- A further point on the station is that the carpark is full by 7:20 am. most weekdays and there is no opportunity to expand the carpark. Many cars park on verges beyond the yellow lines. This is not a sustainable proposition.
- The other public transport option, the bus service to Alton or Farnham is once every hour. Impractical for most commuters or travellers.
- Bentley Station is primarily used by commuters and travellers to London. It is not a general mode of transport to get to larger local settlements and their facilities. For example, the Alton Sports Centre, and doctors.

6. Inconsistency in the methodology used by the consultants – Given the claim of accessibility of Bentley Station (Tier 5) to Bentley (Tier 3) we would question that they should be evaluated equally as presumably they are accessible to one another. This does not seem to have been taken into account. In addition, we do not think that the methodology used is suitable for a largely rural area; EHDC state that the largest settlement has a rating of 58.6, the lowest 2.1 with a very low median of 4.9. This is clear proof that huge areas of East Hampshire are very rural, necessitating the use of private transport to live, work, supply, care, learn and enjoy.

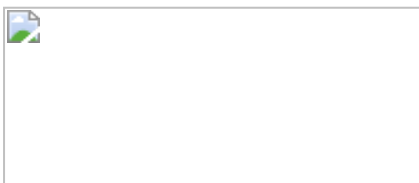
In summary:

Bentley Parish Council strongly recommend that Bentley is a Tier 4 settlement, alongside other similar settlements such as Medsted, Ropley and Headley Down. This seems much more reasonable for the reasons stated.

Best regards,



Councillor and Tree & Planning Officer



Bentley Memorial Hall
Hole Lane
Bentley
GU10 5NB
Tel: 07501 963420

Bentworth Parish Council Comments – Draft Local Plan 2021-2040 (Regulation 18 Consultation)

In principle the draft local plan looks good but on closer inspection it appears there is an excessive housing target placed on Bentworth compared to other similar small villages. Bentworth is a village with no amenities except a part time public house. Page 330 Settlement Hierarchy and Proposed sites Why is Bentworth identified in the settlement hierarchy (5) with a score 1 out of 40. it has no amenities except for a part time pub. Lasham which scores 0 on the settlement hierarchy ranking has a pub, industrial park with employment opportunities, a large garden centre offering a restaurant and groceries and a large flying club/airport offering further employment. How can Lasham be a lower rating?

Villages in downland ward have similar amenities to Bentworth but only Bentworth has a housing target. 10 houses for the historic village of Bentworth and zero for the remainder of Downland Ward! The draft plan runs to 2040. If signed off in Autumn of 2025 it will have a potential 15-year validity. In the 18 months to finalisation of the plan Bentworth could exceed targets for this local plan if current planning applications are approved but would not impact further opportunities for development on the proposed sites. Page 462 of draft plan states there is a funding gap for improvement works associated with St Marys School. New housing development in Bentworth would improve the justification for the allocation of additional CIL funding. Build Houses in Bentworth to fill a school funding gap?

Most of the children attending Bentworth school don't live in Bentworth but the residents of Bentworth have to pay a price for the school. Few children attending the school live in Bentworth . If children are attending from other areas in east Hampshire why should Bentworth residents be paying for improvements.

Villagers have to put up with traffic from parents driving their children to school.

We already pay a high price for this school.



BINSTED PARISH COUNCIL

RESPONSE TO

EHDC LOCAL PLAN

REGULATION 18 (2024)¹

¹ Responses can be submitted through website: easthants.gov.uk/lp-consultation by email to: localplan@easthants.gov.uk or in writing to: Planning Policy East Hampshire District Council, Penns Place, Petersfield, Hampshire, GU31 4EX.

1. Background

- 1.0 This document is submitted by Binsted Parish Council (BPC) in response to East Hampshire District Council's Local Plan 2021- 2040) Regulation 18 consultation (2024).
- 1.1 Binsted parish has a population of 1,900² and is a rural parish - amongst East Hampshire's largest. It covers 2,800 ha (7,000 acres), stretching 8 km west to east (Alton to Rowledge).
- 1.2 Binsted parish is split between two planning authorities. The South Downs National Park (SDNP) is our Lead Planning Authority, as most of the parish's land lies within the National Park.
- 1.3 The South Downs Local Plan³ is in the initial stages of review and its planned site allocations have not yet been announced. Any SDNP allocations for our parish will be **additional** to the allocations proposed in this EHDC Regulation 18 Local Plan consultation.
- 1.4 BPC recently consulted its parishioners about planning priorities, to prepare its Parish Priority Statement, which was submitted to SDNPA in October 2023⁴ This identified three priorities:
 - i. **Urgently address traffic problems across the whole parish** (road traffic volumes, speeds and safety, and the absence of both safe cycle tracks and bus transport.)
 - ii. **Preventing building on farmland and woodland and areas of existing high biodiversity.**
 - iii. **Exploring the potential to build on brownfield locations, such as farmyards.**

2. Our objections to EHDC's Regulation 18 Local Plan Consultation

- 2.1 BPC considers EHDC's draft Local Plan unsound. It is inconsistent with the National Planning Policy Framework (NPPF) and does not achieve the correct balance between development, environmental protection and public interest.
- 2.2 Section 3 below details our concern about the extreme disconnects between the stated desired outcomes of the proposed policies and the likely actual results of the proposed Plan. We have concern about all aspects of the proposed Plan: the spatial strategy; the Settlement Hierarchy and its application; and site allocation numbers.
- 2.3 Section 4 explains in detail our concerns about the impacts of the three proposed site allocations within Binsted parish, most particularly the selection of Alton as the SOLE Tier 1 Settlement and the proposal to locate EHDC's sole 'Strategic Site' in Binsted parish. We also have great concern about EHDC's proposal to promote Holt Pound to a Tier 3 Settlement. For all three sites, our concerns focus around three main issues:

i. Loss of greenfield land and negative impacts on nature and biodiversity:

All three large sites⁵ proposed in our parish would involve the sacrifice of greenfield land:

- Neatham Down (Site ALT8) is the sole 'Strategic Site' in EHDC's Plan and covers 97.9 ha of productive (Grade 3A) farmland which is also a "valued landscape."
- Lynch Hill (Site ALT 7) and Holt Pound (Site HOP 1) cover a further 13.2 ha of farmland.

² 2021 Census

³ Adopted 2 July 2019

⁴ <https://binstedparishcouncil.org.uk/wp-content/uploads/2023/11/Binsted-Parish-Priorities-Statement-vFinal2023.pdf>.

⁵ ALT8 Neatham Down, HOP1 Holt Pound and ALT7 Lynch Hill

Their development would come at a huge cost to biodiversity and nature, including to the River Wey and its chalk aquifer. It conflicts with EHDC's Policy NBE10 'Landscape', which puts a duty on EHDC to "respect and enhance the Local Plan Area's landscape assets." Greenfield sites also directly conflict with the government's 'Brownfield First' policy. There are better ways to create new homes - and affordable housing - that avoid the environmental harm caused by building on greenfield land. In our rural parish, Rural Exception sites could be used to build affordable housing on rural brownfield (farmyards, airfields, etc.) Around Alton, the Neatham site and other countryside without AONB/National Park designation could create a new 'Alton Greenbelt' (or green 'fingers') to link the town to the National Park. Potential opportunities also exist for local joined-up land management along the River Wey and BOA-17⁶, as described in Section 4.1.8. The UK Natural Capital Committee suggests that creating new wetland and woodland around towns are important opportunities.

ii. Pressure on local infrastructure:

The combined housing developments proposed *in our parish* (the 'Strategic Site' at Neatham Down and Site HOP-1 in Holt Pound) would **MORE THAN DOUBLE** our parish population, putting unacceptable pressure on all aspects of local infrastructure including roads, water supply, sewage treatment and health care, as well as fundamentally changing the rural character of the area.

In fact, the whole rationale of a 'Strategic Site' is to deliberately bring great change to an area. Such sites are planned new communities that are meant not to be mere housing estates but to 'deliver communities and to add value to the wider area'.

Strategic Sites are risky propositions: it is challenging to ensure the delivery of their infrastructure, as all basic services such as water, sewerage, roads, and health services must be provided from scratch. Successful Strategic Sites tend to be locations with good pre-existing road and rail infrastructure - often legacy from previous industrial use (for example, disused airfields, or disused mine workings) - which have spare road capacity to cope with influxes of new residents.

All new settlements require investments in infrastructure to be made by a range of bodies (Highways, private water companies, GP surgeries, etc). And even when funding for a Strategic Site's new infrastructure is secured (such as the highways upgrades at A32 & M27 J10 for Fareham's Welborne Garden Village⁷), the process of 'upgrading' infrastructure is very disruptive.

The sad reality is that many of these planned new communities fail, having "*been planned in the wrong locations, too far from town centres and rail stations, which therefore generate high levels of traffic and condemn their residents to car-dependent lifestyles. Funding for walking, cycling and public transport is often missing, so ... their reality is often completely at odds with the visions presented, worsening climate change and failing their residents.*"⁸

Neatham Down is NOT a sustainable location for a 'Strategic Site' and risks the failure described above. Walking, cycling and other car-free travel options are unfeasible. Local roads are already overcrowded. And it seems particularly perverse to clog up an A31 junction with new cross-town traffic, when A31 was originally built as a by-pass to keep traffic away from the town. And there is no sign that any outline commitments for infrastructure provision at Neatham have as yet, been made.

⁶ BOA-17: Biodiversity Opportunity Area #17 runs West-East: *Hawbridge-Malms-Isington-Bentley Station*

⁷ <https://www.local.gov.uk/case-studies/effective-delivery-strategic-sites-fareham>

⁸ <https://www.transportfornewhomes.org.uk/the-project/garden-villages-and-garden-towns/>

iii. Unreasonable housing allocation for Binsted parish

Parishes that lie mainly in the National Park generally expect their housing allocation to be *lower* than if the whole parish lay in EHDC. But even if Binsted parish lay entirely in EHDC's area, the housing allocation it would expect would be a fraction of the 1,019+ houses that EHDC proposes in Binsted in the Plan - and of course Binsted parish will also have to accommodate ad-hoc infill developments, PLUS further potential development sites yet to be proposed by SDNP's Local Plan. Shoe-horning East Hampshire's entire housing "need" into the parts of our parish that lie outside SDNP's boundary undermines Binsted's sustainability and harms the countryside setting of the National Park.

2.4 EHDC has failed to adequately engage with our local community.

EHDC has fallen short of standards set out in NPPF Policy (3) para 16 (2019⁹) which states that -
"plans should: ... (c) be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, infrastructure providers and operators and statutory consultees.

Planning Authorities

"are encouraged to 'front load' consultation with the public, from the earliest stages of each document's development, so that communities have the fullest opportunity to participate in plan making and to make a difference"

and to use Statements of Community Involvement (SCI) to describe how they will do this. EHDC's SCI covers only the statutory minima to which Planning Authorities must conform for Local Plan production.

EHDC's claim to want to hear residents' views about sites *proposed* in its Draft Plan seems hollow:

- i. EHDC's proposed Plan effectively annexes 107 ha of Binsted parish (4% of the parish's land area), making it a suburb of Alton. It therefore seems extraordinary that EHDC did not communicate with BPC (in whose parish Neatham Down lies) when it informed Alton Neighbourhood Plan's Steering Group about the site in October 2023, or subsequently.*
- ii. EHDC's proposed Plan contains NO mention of Binsted Parish and ALT-8 is misleadingly labelled and described as an Alton site, with no mention that Neatham Down lies in Binsted parish.*
- iii. If ALT-8 went ahead, a re-drawing of Alton settlement boundary seems likely to follow. A change in settlement boundary would have significant consequences: removing Neatham residents would reduce Binsted parish's Precept; Neatham residents would pay increased council taxes.¹⁰*
- iv. The term 'Strategic Site', in planning parlance, has a specific meaning¹¹. This should have been explained in layman's terms in the consultation, at least in response to questions at EHDC's January 'consultation' Zoom briefing for Parish Councils. EHDC's 2024 paper on 'Settlement Boundary Review' omits to mention that Strategic Sites 'trump' the concept of Settlement Boundaries. Also, many parishioners are unaware of the scale of the proposed development - they imagine Neatham would be the size of a 'normal' housing estate.*

⁹ We recognise that the NPPF was amended (in 2021 and 2023) but the relevant paragraph 16 remains.

¹⁰ Alton Town Council tax being higher than Binsted Parish Council's.

¹¹ <https://www.local.gov.uk/publications/effective-delivery-strategic-sites-accessible-version#introduction>

- v. The Alton Neighbourhood Plan Steering Group (ANPSG) is concerned that EHDC’s directions to allocate up to 700 homes for the Neighbourhood Plan does not work for Alton alongside the new ALT-8 “Strategic Site” allocated by EHDC. ANPSG believes that creating a car-dependent community of up to 1,250 homes on the outskirts of Alton would thwart its plans for active travel, and the net result would just be more housing for Alton with little or no supporting infrastructure. The ANPSG is also concerned that EHDC’s actions have posed a threat to the “integrity and freedom” of the neighbourhood plan process.

3. Our objections regarding EHDC’s overall strategy

3.1 It is BPC’s view that the current draft Plan, if taken forward, would fail at examination. Many of EHDC Plan’s policies are admirably aspirational but are not deliverable. Examples: the proposal to implement the spatial strategy by siting a ‘new village’ in a constrained location; the unjustifiably high quantity of development sought; and the flawed distribution of proposed sites across the settlement hierarchy.

3.2 EHDC’s stated priority of focusing growth in existing Higher Tier Settlements would not be achieved by the ‘Strategic Site’ at Neatham Down, which in reality would create a new settlement that has no meaningful attachment to the existing town of Alton.

3.3 EHDC’s proposal that Alton (newly combined with Holybourne) becomes the sole Tier 1 Settlement in the Revised Settlement Hierarchy is unsound. Comparative population figures should take account of building already in progress, rather than being based solely on 2021 Census. As Whitehill & Bordon’s population will soon exceed that of Alton & Holybourne (per Table A), it seems inappropriate to demote Whitehill & Bordon, and to expect Alton to shoulder a higher housing allocation.

Table A: Comparative populations	2021 Census population	Additional residents from existing planning permission	Population, prior to EHDC proposed new Local Plan developments
Alton	19,400	1,682 (= 701 houses x 2.4 residents/house ¹²)	21,082
Whitehill & Bordon	17,600	5,760 (= 2,400 houses x 2.4 residents/house)	23,360

3.4 EHDC’s proposal to promote Holt Pound to a Tier 3 Settlement is unsound. It should remain Tier 4.

3.4.1 We oppose Holt Pound’s promotion to a Tier 3 Settlement, which EHDC claims is justified “due to its perceived proximity to Waverley services” and resultant high accessibility score.

3.4.2 Holt Pound is a small hamlet with just over 100 dwellings. It has no services other than a pub on the A325, a car garage and Stables. *The accessibility score attributed to Holt Pound by EHDC is incorrect. Other than limited facilities in Rowledge, Waverley services described are not nearby and are not easily reached by foot or bicycle as implied by the accessibility score. The A325 is not considered a safe cycling route with narrow lanes, heavy traffic and 40-50mph speed limits. BPC proposed that cycle lane provision should be introduced as part of the current Belway Homes development on ‘Land West of Fullers Road’, but this was rejected by EHDC Planners.*

3.4.3 Holt Pound certainly does not act as “a focal point for surrounding villages and rural areas in terms of the provision of local services and facilities” which is typical of a Tier 3 Settlement. We consider it should return to Tier 4. It is inappropriate to place Holt Pound on a par with East Hampshire’s other Tier 3 locations – namely: Bentley, Clanfield, Four Marks, Grayshott, Headley and Rowlands Castle.

¹² 2.4 residents is the UK’s average household size (2021 Census.)

3.4.4 EHDC’s Revised Settlement Hierarchy Background Paper 2024 states that settlement populations have been considered, but Holt Pound clearly stands out as being much smaller than any of the other Tier 3 Settlements:

Tier 3 Settlements	Population*
Bentley	1,400
Clanfield	5,900
Four Marks	5,600
Grayshott	2,800
Headley	1,500
Holt Pound	<350
Rowlands Castle	3,200

* Using figures from the Revised Settlement Hierarchy Background Paper 2024 or ONS Census data where they were not included.

3.4.5 Holt Pound is of a comparative / even smaller size when compared to settlements in Tiers 4 and 5. For example: Medstead (Tier 4) has a population of 900; Ropley (Tier 4) has a population of 310; Beech (Tier 5) has a population of 460.

3.5 Insufficient evidence for the proposed distribution of development across the Settlement Hierarchy:

EHDC’s proposed Policy S2 (Settlement Hierarchy) reflects the view that settlements that offer more opportunities for people to access services and facilities on foot or cycle should be preferred as locations for new development.”¹³ Consequently EHDC’s ‘Revised Settlement Hierarchy’ Background Paper ¹⁴ incorporates the Accessibility Study undertaken by EHDC’s Transport Consultants ‘Ridge and Partners’ to identify which locations in East Hampshire best enable residents to reach key facilities within a 10-minute walk or cycle. Horndean and other southern settlements, as well as Liphook and Whitehill & Bordon, all achieved higher accessibility scores than Alton and Holybourne.

In spite of this, EHDC’s Southern and Northeast regions have been allocated a surprisingly small percentage of the proposed new homes¹⁵. Neatham Down scores very badly in the Accessibility Study – but curiously, this is not discussed in EHDC’s Paper, and its score is excluded from the paper’s discussion of Accessibility Study results for Alton and Holybourne.

3.6 We would have expected Hampshire Highways to be a proactive planning partner from the outset,

given Hampshire citizens’ widespread concerns about traffic issues. We are concerned at the lack of evidence in the transport study to assess how the overall quantity of development would impact the highways network, and the absence of settlement-specific mitigation requirements (except for some high-level work on requirements for sites at Whitehill/Bordon). It is worrying that no transport impact/capacity work has been undertaken as part of the selection of the sole strategic site.

3.7 The Plan fails to present credible evidence in respect of site allocation numbers,

as no capacity testing has been undertaken. Numbers given for the Neatham Down site seem chosen purely to qualify it as a ‘Strategic Site’. Across all the Plan’s sites, landowners promoting the sites seek higher numbers than the ‘indicative’ numbers shown in the Plan. As site allocation figures cannot be relied upon, it is difficult to evidence the need for a large strategic site.

3.8 There seems no justification for including a 22% buffer above the 9,082 new homes figure that EHDC calculates it needs to meet its central government target (after absorbing the SDNP shortfall). Ad-hoc infill proposals coming

¹³ https://easthants.moderngov.co.uk/documents/s24099/OUR%20LOCAL%20PLAN%202021%20-%2020240_FINAL_Part8.pdf

¹⁴ <https://www.easthants.gov.uk/sites/default/files/2024-01/Revised%20settlement%20hierarchy.pdf>

¹⁵The proposed Plan’s housing allocations fall into the following regional areas:

- North*:** Upwards of 1,519 new houses plus 8 Travellers sites. (* Alton, Four Marks, Ropley, Medstead, Bentworth, Bentley and the western area of Binsted parish which lies within EHDC.)
- Northeast**:** 864 new houses plus 6 Travellers sites. (**Area includes Bordon & Whitehill, Liphook, Grayshott, Headley Down and Holt Pound.)
- South***:** 688 new houses with no Travellers sites. (***)Area includes Horndean, Clanfield, Rowlands Castle, Catherington and Lovedean.)

forward surely form a further 'buffer' above the planned allocations? We acknowledge that NPPF rules allow plan requirements that are above the minimum figure. Even erring on the side of caution, we feel that a 10% buffer would be ample and would reduce the overall requirement by 358 homes over the plan period.

3.9 Inadequate prioritisation of brownfield developments: government recently announced that every council in England should prioritise brownfield developments and should be less bureaucratic and more flexible in applying policies that halt housebuilding on brownfield land.⁴ Binsted parishioners also support a 'Brownfield First' approach, as expressed in Binsted's 'Parish Priority Statement' of October 2023, and we feel there are opportunities to achieve this through Rural Exception sites, as discussed in Section 4.1.11 on Affordable Housing. In Alton town centre too, there are opportunities for brownfield development, presented by the town's various declining retail and commercial premises. EHDC appears to have made scant effort to take a 'Brownfield First' approach. It does not appear to be following this approach. EHDC has not put any sites on Part 2 of its register of local brownfield land; and is also not seeking to consider Permission in Principle¹⁶ (PiPs) to de-risk smaller brownfield sites.

3.10 Failure to deliver climate change goals. EHDC's proposals will not deliver EHDC's goals to mitigate and adapt to climate change. EHDC has fine words in Part B, Section 04, CLIM2 about ensuring new developments are accessible by walking or cycling. But even EHDC's own consultants express doubt that achieving "20-minute neighbourhoods" is realistic in a rural area like East Hampshire.

4. Problems specific to the three proposed development sites located within Binsted parish and the Land adjacent to Alton Sewage Treatment Works in Alton.

4.1 ALT-8: The 'strategic' site on land at Neatham Manor Farm in Binsted Parish.

BPC is extremely concerned about this site, and urges its withdrawal, for the following reasons:



View across Neatham Down



Trout in Northern Wey, just downstream

4.1.1. This site has already been assessed and rejected (for a smaller development): EHDC's [Interim SA Report \(Strategic Site Options\) February 2021](#) stated, in relation to the previous 600 house proposal: *"this area is close to the South Downs National Park and is considered to be a highly sensitive landscape with a low capacity for development in the Council's Landscape Capacity Study (2018). An option for employment development was previously considered through the LAA and SA in 2018,*

¹⁶ Granting PiP for appropriate sites is a useful tool designed to speed-up smaller housing-led development which "should be utilised wherever appropriate to de-risk sites and help bring forward housing."

prior to the Draft Plan consultation, but ultimately not taken forward for detailed appraisal. Key concerns at the time were in respect of landscape and groundwater flood risk.”

4.1.2 The proposal has doubled in size since EHDC’s 2019 ‘Large Sites Review’. The original proposal was for 650 homes, this proposal states “1,000+ homes”¹⁷ (an increase of at least 55%); and the site promoter is advocating delivery of 1,250 homes.

EHDC’s description of “1,000+ homes” simply indicates EHDC Planners’ pursuit of a ‘strategic scale residential site’ (which is defined as 1,000 homes or greater), so that they can get approval to build on the countryside outside of Alton’s settlement boundary, which otherwise would not be allowed by NPPF policies or by EHDC’s own rules.

The expanded site includes Neatham Down, Golden Chair Hill and Copt Hill. Compared with the previous proposal, development would extend much higher up the hill, and on both sides of the ridge. Development on Golden Chair Hill’s eastern slopes would have intervisibility with the National Park, and so be “within its setting”. This is a key change since 2021’s Large Development Site review.

(Note: we would like EHDC to confirm that advice provided it received to inform its Integrated Impact Assessment Scoping Report¹⁸ from the Environment Agency, Natural England and Historic England (as statutory consultees) covered the late addition of the Neatham Down expanded, ‘strategic’ site. The Executive Summary of the Scoping Report states that the consultees provided updated comments in October 2023 (which pre-dates the inclusion of the Neatham Down site).

4.1.3 The site is disconnected from Alton: Although this Site is located close to the Settlement Hierarchy Tier 1 town of Alton, and in this sense may *seem* to be a sustainable location, in reality it is separated from Alton by the busy A31 and Lynch Hill. Even with bridging over A31, it would be difficult to integrate it with Alton’s facilities. Whatever accessibility improvements are made, parts of the site would remain a 30 - 40 minute walk to the middle of Alton High Street (2km) and over a 10 minute cycle ride. This was confirmed in Terra Firma’s Landscape Value Statements of Large Development Sites (July 2020), which stated the Neatham Down site *“is offset from the existing edge of settlement by the A31 and Lynch Hill beyond, although part of Lynch Hill is within Alton’s settlement policy boundary. Despite the proximity of the A31 and the town, both have little influence on the site’s rural, undeveloped character and the site has a strong relationship with and connection to the wider landscape to the east, forming part of the countryside setting to the town.”*

4.1.4 Access. The proposed safe route for walking and cycling across the existing third-party owned A31 would be suitable only from limited parts of this very large site, and the route through the industrial estate is unattractive and far from the town centre. There is no discussion on how pedestrians will access the development across the busy A31, let alone a parent carrying two bags of shopping and trying to keep children safe. There are no cycle lanes to make it safe to reach the new Strategic Site by bicycle. The recently opened Mill Lane Alton retail park clearly shows the difficulties in providing safe pedestrian access to the shops, there being an incomplete footpath and no pedestrian facilities to help them cross the busy Montecchio Way. Also, as noted in Section 4.2, there are potential constraints over access. Without resolution, the site is unlikely to be considered deliverable.

4.1.5 An unsustainable location with high car dependency: As already stated, the site proposed would be a new settlement, largely unconnected to Alton ... an unsustainable location which undermines EHDC’s Plan Climate Objectives. EHDC’s Transport Consultants ‘Ridge and Partners’ scored the site

¹⁷ This would result in an average plot size of 980m² or below

¹⁸ www.easthants.gov.uk/media/8733/download?inline

poorly overall in its [Living Locally Accessibility Study](#), with one of the lowest minimum scores in the district, at the minimum of 4, given its inaccessible location.

EHDC itself admits that this site means high car use, and high associated carbon emissions. Distance from secondary schools, larger shops, workplaces, and transport hubs means its 1,000+ houses will have a higher than average¹⁹ car dependency (well over 1,500+ cars). The site would put further extreme pressure on already-overloaded local roads. It would cause additional traffic congestion: (i) into Alton, (ii) at junctions with A31 corridor (A31 already has bottlenecks in Ropley and Farnham and ironically, of course, was specifically designed to *bypass* Alton); and (iii) and on rural roads across Binsted and surrounding areas. Cycling infrastructure in East Hampshire is underfunded. Little progress has been made in delivering Hampshire's LCWIP, even in town centres, let alone in rural areas. Reductions in greenhouse gas emissions (from reducing carbon emissions from the site's houses, during construction and subsequently) would be undermined by this high car dependence.

All attempts at environmental sustainability are thus totally undermined: NPPF 2023's plans for environmental sustainability; EHDC's own Local Plan objectives; prioritisation of active travel (by foot and bicycle) in HCC's LTP4 Transport Plan; and BPC's Climate Action Plan.

4.1.6 EHDC's Health and Wellbeing aspirations also cannot be met at the site, not only because of the lack of safe walking and cycling routes, but also due to difficulties in securing investment for GPs, dentistry, social care and so forth. Alton's Wilson Practice is already oversubscribed by 2,700+. The proposed site is a poor location for an ageing population - which will increase by c. 36% by 2040. Whilst Surrey County Council promotes "green prescribing" for residents, EHDC appears to be considering removing green opportunities for residents.

4.1.7 Flood risk and climate resilience - [EHDC's 2018 Strategic Flood Risk Assessment \(SFRA\)](#) identifies the site is substantially affected by areas of groundwater flood risk. The edge of the proposed development is only 30m from Northern Wey River, which has flooded in recent years (and is expected to do so more frequently in future). Development will exacerbate flooding issues on-site and in the local area (e.g. in Bentley, Farnham's Coxbridge roundabout and Farnham Maltings): it will prevent rainwater from being absorbed into the ground, causing it to 'run off' into drains and placing additional demand on Alton's sewage treatment plants.

4.1.6 Inadequate local sewage treatment capacity: Both Alton Newman's Lane and Holybourne Sewage Treatment Works (STWs) frequently discharge untreated sewage into the Northern Wey, a chalk stream. Alton's STW is identified as needing investment – it cannot cope with Alton's current population, let alone any further expansion. (As this submission was being written²⁰, both STWs were discharging raw sewage.)

Decreases in invertebrates seen through Riverfly Monitoring document how the ecology of the Northern Wey chalk stream is suffering.

4.1.7 This development would put extreme pressure on the Northern Wey chalk stream. Chalk streams are classified as Biodiversity Action Plan (BAP) habitats in need of protection and, where possible, improvement. In September 2023, the government announced changes to protect England's precious chalk streams ([Changes announced to better protect England's chalk streams - Defra \(blog.gov.uk\)](#)). Chalk streams only survive when rainwater falls to the land and sinks through purifying chalk to create an aquifer that then erupts through springs, forming unique 'gin-clear' waters. The Northern Wey River's water levels and flow rates have already significantly decreased. The proposed

¹⁹ Hampshire households have an average of 1.4 cars per Household (2021 Census data.)

²⁰ On 25 February 2024.

development would seriously endanger the river, through the combined effects of preventing aquifer recharge and increasing water demand. Our concern is that the development could result in the Northern Wey River becoming a 'dead' chalk stream. In BPC's 2023 'Parish Priority Statement' we identified potential opportunities for joined-up land management along BOA17²¹ and River Wey (our parish's northern boundary). The proposed development would thwart these endeavours.

4.1.8 Neatham Down is a 'Valued Landscape', as noted in CPRE's response to the EHDC 2019 Large Development Sites consultation. "*Several factors contribute to this site being out of the ordinary, with a medium/high value rating*", with the following key aspects of value at the site:

- *The locally distinct 'bowled' topography of the site and its immediate setting.*
- *Positive characteristics of the wider Landscape Character Assessment:*
 - o *Open landscape with views across arable farmland*
 - o *A peaceful and unsettled landscape*
 - o *Part of an area with an overall strategy to conserve the open unsettled landscape with broad views across fields bound by hedgerows*
- *The site has a strong relationship, and continuity, with the countryside to the east.*

Neatham Down, Golden Chair Hill and Copt Hill High form a landscape which is of the highest quality within EHDC's Plan Area and are undoubtedly a Valued Landscape. The character of this landscape would be lost, along with views over this fine undeveloped landscape from high ground across A31 (e.g. Brockham Hill and Holybourne Down). The enjoyment of Rights of Way users crossing this 'valued landscape' towards the national park would also be compromised by the proposed development.

Neatham Down falls within an area of low landscape capacity for housing development as assessed in the East Hampshire Landscape Capacity Study. Proposing the Strategic Site at Neatham Down also does not comply with NPPF policy Para 170: "*Planning policies and decisions should contribute to and enhance the natural and local environment by: a) **protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality)**.*

Although a site's 'Valued Landscape' status does not prevent all development, the presumption is firmly against large-scale development, which can only be justified "if absolutely necessary". In relation EHDC's Policy S1, the housing numbers being proposed are excessive. NPPF parameters would justify only a significantly smaller number.

4.1.9 Development proposed on this good quality (3A) agricultural land would not conform to Policy NBE 13 'Protection of Natural Resources', nor to EHDC's policy DM12 on Dark Night Skies.

4.1.10 Affordable Housing. SDNP and EHDC have each recently stated that larger sites make it 'easier' to deliver affordable housing, since Housing Associations find management 'easier' on larger sites – this seems a weak reason for justifying a Strategic Site on an inaccessible greenfield site. We had understood that it is usually preferable for affordable housing needs in urban areas to be met on more central brownfield locations (where there is access to a wider range of facilities and the need to travel is minimised); and for affordable homes in rural areas to be delivered through rural exception sites (which Binsted Parish Council would be interested to explore.) At Neatham, the paucity of local services and facilities, and difficulties in providing subsidised bus services, are likely to thwart EHDC's ability to deliver the quantity of affordable housing required locally. Additionally, this site's crumbly chalk geology will make building here expensive, which is a further hindrance to affordability.

²¹ BOA17: Biodiversity Opportunity Area #17 runs West-East: *Hawbridge-Malms-Isington-Bentley Station*
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- 4.1.11 A new ‘village’ at Neatham Down opens the possibility of gradual and creeping coalescence** with Holybourne and, by breaching the A31 for the first time, the whole tract of countryside between the A31 and the SDNP may be perceived as being “ripe” for development.
- 4.1.12 EHDC’s proposal to create a ‘CIL island’:** it is telling that EHDC believes all CIL generated must be used to fund basic infrastructure (school, village greenspace, etc) in order to mitigate the site’s non-existent existing infrastructure. Indeed, the ‘Strategic Site’ at Neatham is likely to require substantial further amounts of infrastructure funding.
- The proposed ‘CIL island’ will deprive Binsted Parish of any CIL funding from the new development. This is unacceptable, as Binsted Parish would require a source of funding to adjust its community facilities to accommodate such a huge increase in the local population.
- 4.1.13 The proposal to build a new primary school at Neatham Down** could have a negative effect on the future viability of Binsted’s much-loved, one-class-intake primary school.
- 4.1.14 To address Policy DM8 covering historic heritage,** the Neatham Down site will need to undertake a full archaeological evaluation before determining the site’s suitability. Neatham Down is near the Roman town site at Neatham/Holybourne; there are Roman villas and a Roman road nearby; and the adjacent Monkwood earthworks (which are probably medieval).
- 4.1.15 Ultimately, we note that the site is not even needed to achieve EHDC’s required housing requirement!** The allocation proposed for this site seems completely unjustified, as the proposed numbers include the whole or part of the excessive buffer that was discussed in Section 3.7.

4.2 HOP-1: Land North of Fullers Road, Holt Pound, in Binsted parish



Views of Land North of Fullers Road

- 4.2.1 We OPPOSE the proposed change in Holt Pound’s settlement boundary and the associated proposal for 19 houses at this site and consider this proposed allocation should be withdrawn.**
- 4.2.2** This site is currently designated as ‘Countryside’. Its development would cause great loss of green space.
- 4.2.3** In 2018, EHDC assessed that *“residential development of this site ‘would have an adverse impact on the rural character of the area and is disproportionate in size to the existing settlement.’”* It was previously considered undevelopable, so this proposal represents a significant U-turn.
- 4.2.4** As detailed in Section 3.4, we are strongly opposed to Holt Pound being promoted to a Tier 3 Settlement and consider it should remain as Tier 4. As such, EHDC is unjustified in proposing to change the settlement boundary in order to bring this site into the boundary and make it developable.
- 4.2.5** Development of this site would directly contravene EHDC’s Draft Local Plan Objective B1 (Providing better quality, greener development in the right locations), which seeks to *“Make sure that new developments are located to maintain and improve the quality of built and natural environments, including our high-quality and valued built heritage and landscapes, whilst maintaining the integrity of existing settlements and their settings.”*

4.2.6 We **OBJECT** to the proposed development of this site, because:

- The site is within the countryside.
- The site is an important contributor to the character of Holt Pound.
- The disproportionate scale of development, of a type that would represent sub-urbanisation, directly contravenes Objective B1.
- The site is located within the Wealdens Heath Phase Special Protection Area buffer zone.
- The site is within the Thames Basin Heath 7km buffer zone.
- Sites of Importance for Nature Conservation (SINC) (The Willows Green/Glenbervie Inclosures, and Holt Pound Inclosure) are near to the site.
- Parts of the site and the access road are susceptible to surface water flooding and the site is bordered by the Bourne Stream.
- The site helps differentiate Holt Pound from Rowledge and Wrecclesham (more suburban areas).
- The site provides an important amenity to Holt Pound residents.
- The site is bordered by a public footpath which is popular for walkers and the development would be visible from the footpath.
- The site is very near the South Downs National Park, so intervisibility needs to be considered.
- The footpath connects through to Rowledge and Alice Holt forest – development would reduce access to these amenities.
- The site is currently used for grazing horses by the stables nearby.

4.2.7 At face value, EHDC's suggestion to permit the development of 19 houses on this large site seems a reasonable number (and preferable to previous discussions for a 117-unit retirement village on the site). However, the developer (Falcon Homes) clearly sees this as a "land and expand" operation and plans a much larger development. The developer's website <https://www.falcondevelopments.co.uk/> states: "A proposal for up to 50 homes is being promoted within the draft East Hampshire Local plan - their mockup is shown below:"

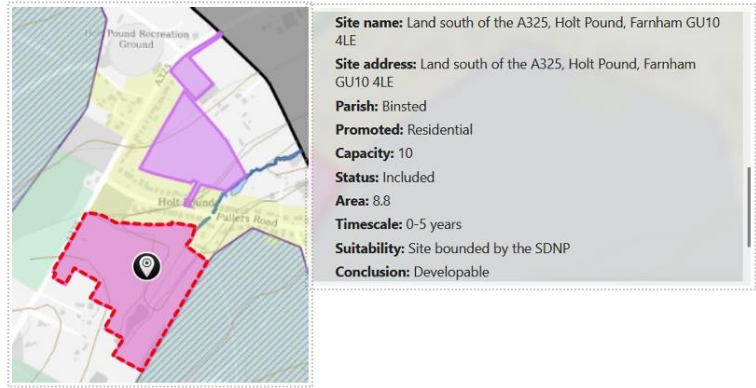


4.2.8 This proposed form of development would be at odds with Holt Pound's setting, form and semi-rural character. Its scale would be disproportionate to the size of the existing settlement and a suburban infilling of green space.

4.2.9 Development of this site would put Holt Pound's identity under threat. The precedent set by developing Site HOP-1, combined with the proposed promotion of this hamlet to Tier 3 in the Settlement Hierarchy, would create huge pressure to permit development in the many other local fields, all the way to Manley Bridge Road and Waverley in the west. This would encourage coalescence with other nearby settlements which are in Waverley (Surrey) and fall under Farnham Neighbourhood Plan: "Other Distinct Town Areas (Badshot Lea and Weybourne; Rowledge and Wrecclesham;

Rowledge and Boundstone and Rowledge and Frensham): “The southern part of Wrecclisham, marked by the linear development along Echo Barn Lane, is separated from Rowledge by an attractive valley occupied by the Bourne Stream and comprising woodland, trees, hedgerows and pasture. The valley has a high landscape sensitivity - meaning it is unlikely to be able to accommodate change without extensive degradation of character and value.” Site HOP-1 itself doesn’t fall within this defined area, but it is very nearby and has a continuation of the Bourne Stream within it.

4.2.10 If the current HOP-1 site is approved for development, it will create a huge pressure from other sites like it in the local area to gain approval for development. We note that the latest East Hants Land Availability Assessment (LAA) includes another site in Holt Pound to the south of Fullers Road (LA/BIN-012). It has not been added to the Draft Local Plan but has been assessed as ‘Developable’ in the LAA (extract shown). It is vital that Holt Pound does not lose all the countryside that surrounds it.



4.3 ALT-7: Land at Lynch Hill (LAA/BIN-008) which lies within Binsted Parish

- 4.3.1** This site has a complex history, with planning discussions spanning many years. BPC has made its views known through responses to previous planning applications. There were two outline consents for the site, (49776/003 and 49776/004), an outstanding reserved matters application for the whole of the site (49776/004) as well as an outstanding reserved matters application for site access for pedestrian, cycle, and vehicular access to the site from Waterbrook Road (49776/005).
- 4.3.2** Listed under the constraints and opportunities for this site, the question of access is noted, stating that there is a private track which runs through the site, which connects Golden Chair Farm with the Waterbrook Road, which must be factored into any reserved matters decision affecting access from the site into Waterbrook Road and how the site is laid out.
- 4.3.3** It is further noted that it is this privately owned track which would be required to enable pedestrian and cycle access to the proposed site ALT-8; without which access to Alton would be across the A31. It is therefore vital for the delivery of both this site and consideration of ALT-8 that there is certainty in the securing of this right of way for public access.

4.4 ALT-3: Land Adjacent to Alton Sewerage Treatment Works (which lies in Alton)

- 4.4.1** BPC would support the inclusion of this site for an extension to the wastewater treatment site that adjoins it, to increase the capacity of these treatment works. Alton’s Sewerage Treatment Works already has acute problems with raw sewage overflows and investment in expanded capacity is already planned. Significant further expansion of Alton’s population is already underway, even before the 1,700 houses that are being proposed in EHDC’s new Local Plan. EHDC needs to fast track its plans for future sewage treatment, including the upgrade of the adjacent facility.
- 4.4.2** BPC does not support the use of this site for more generic employment uses. Before granting planning permission for any alternative use, EHDC must be absolutely sure that site ALT-3 will not be needed for sewage treatment. Although this piece of land lies within an existing employment area, access, noise, and smell/environmental factors make it poorly suited to normal industrial use.



**BRAMSHOTT & LIPHOOK
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Bramshott and Liphook Parish Council Response to EHDC draft Local Plan

Context

The main purpose of the EHDC Local Plan is to determine the spatial strategy 2021-2040 in terms of housing requirements and sites. It also sets out a policy framework for the consideration of development applications against the following:

Vision:

“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 green and welcoming places to live, work and play and respond positively to the climate emergency”.

Objectives:

- Sustainable levels of growth, housing and economy.
- Providing better quality, greener developments in right locations.
- Prioritising the health and wellbeing of communities in delivering what is needed to support new development.

Issues for Bramshott and Liphook in terms of the spatial and housing allocation

Allowing for adjustments, an additional 3500 homes are proposed including 1100 distributed between Whitehill and Bordon; Horndean and Liphook. Only 111 homes are proposed in Liphook situated at:

- Land North of Haslemere Road (24)
- Land at Chiltley Farm (67)
- Land West of Headley Road (20)



Plan from EHDC Draft Local Plan showing proposed extensions to current Settlement Boundaries.

H1:2 p220 “Housing should be accommodated through development and redevelopment opportunities within existing settlement boundaries in the first instance” BUT H1:3 “Housing outside set boundaries will be permitted where...allocated for development in this LP”. This is consolidated through a “Settlement Policy Boundary Review” which extends the SPB to incorporate these sites. All the proposed strategic sites were outside the previous Settlement Policy Boundary which has now been “stretched” to allow for development. See plan.

This is significant because otherwise different and more rigorous planning policies and expectations would have applied.

Allocated Sites

1. **Land North of Haslemere Road** (site matrix reference LAA/LIP-005)

Previously Policy BL1 would have applied to “development in the Countryside” for this and the other sites given that they were then outside the Settlement Boundary. As such it would previously only have been supported if there was a genuine and proven need for a countryside location.

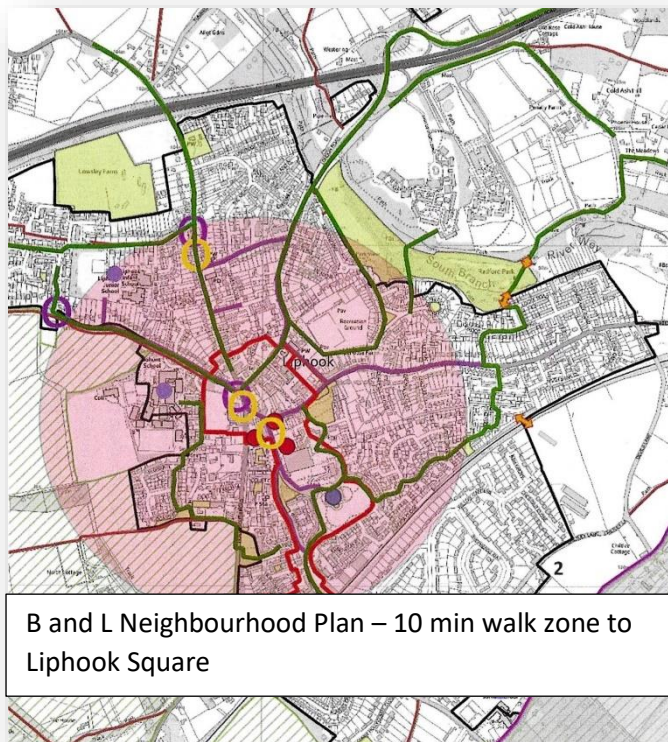
That aside, the emerging BLNDP Policy BN1 “*seeks to ensure that any development within the parish is directed to the most appropriate, sustainable locations where there is easy access to the main village services and facilities...*”

More specifically BL1(B) states approval only where (iv) *it is capable of connecting to the primary movement route network (Policy BL10) supporting the 10min walkable neighbourhood concept and (v) improves the strategic linkages between the development site and Liphook village.*

Site Summary from matrix – Majority of site is within the River Wey Conservation Area. Small area on North edge is in Flood Zone 2 for surface water flooding. Marshes Hollow (SINC) adjacent to North of site, slopes down steeply away from rear of site. SDNP lies to East of site. Considerable constraints to development. Development would form illogical extension beyond the existing settlement, have adverse impact on intrinsic character of countryside and rural setting on the exit from/entrance to Liphook, and alter pattern of development to detriment of character of rural area.

The proposal recognises that the site is adjacent to 2 SINC’s and a Special Protection Area within the River Wey Valley. Any development here would require a separate biodiversity appraisal to demonstrate how negative impacts would be minimised and a 10% biodiversity net gain achieved (BLNP Emergent Plan policy BL 5).

This site is well outside the 10 min walkability area. It is not connected to the Hants CC walking Desire Line. Clarity would be needed on extent to which it meets EHDC Policy HWC1 Active Lifestyles – through easy access to sustainable modes of travel including public transport. Access to BOAT is possible, but due to the topography the route to the north along this BOAT is restricted to able bodied walkers only with very steep and rugged path regularly washed out.



B and L Neighbourhood Plan – 10 min walk zone to Liphook Square

EHDC policy DGC2:1 makes clear that “Development of more than 10 new houses should be situated in the most sustainable locations .i.e. those that are in an accessible distance to enable local living and offer genuine opportunities to travel by sustainable modes (walking, cycling and public transport) for multiple journey purposes”.

It is not clear how this (or the other 2 sites) scored on the Accessibility Study matrix – the matrix itself is explained on p 190 of the EHDC Plan but not the specific calculations.

Proposed density per hectare – Site area is 2.5 Ha. Proposed number of homes 24. At 9.6 homes per hectare this is considerably below target density. Using 7896m² located in the south-west corner-

leaving the eastern field rural and an offset to the conservation area roughly respecting the ridgeline a density of >20 homes per hectare should be possible whilst protecting the rural edge of Liphook as an important transition into rural land beyond. This accords with EHDC Emerging Local Plan Policy on Density, Carbon Reduction in development and the identified provision of smaller more affordable homes.



EHDC Local Plan - Suggested higher density per hectare location added.

Note that parts of the site are potentially subject to fluvial and groundwater flooding.

Note (also for Chiltley below) Policy CLIM 1 “Developers will avoid areas at the greatest risk of flooding... ..design to minimise risk and build

resilience”.

With Liphook housing numbers targeting 111 homes and by applying reasonable density to the two larger and less sensitive sites when considering the Conservation Area status and relationship to settlement boundary, this site could be excluded from the allocation.

2. Land at Chiltley Farm (site matrix reference LIP-017)

Members of the Planning Committee may wish to refer to the full Site Summary as presented during **Public consultation** events supporting the progress of the Neighbourhood Development Plan.

Some key points are:

Would have been outside the existing settlement boundary but now incorporated under emergent plan. Part brownfield. Flood risk and need to control development near railway line. Do these and the requirements under EHDC Plan for settlements of over 10 houses to provide 40% affordable homes affect the density of housing which can be achieved on the site? What is the level proposed? Note that local need for additional affordable and specialist housing over the minimum requirements.

Spatial Strategy /Connectivity – outside 10 minute walkability guide. Not within 20 minute walk of main state schools using current routes. Note Policy DES 1 “Expectations for accessing services and facilities by walking and cycling modes are greatest in Tier 1 and 2 settlements”. Additional walking and cycling routes needed to connect to Red and amber routes. What public transport provision to support connectivity? Policy DGC2:1 will apply as per Haslemere Road site.

Adjacent to settlement boundary, within 20 minute walk of train station and 1.5km to Bus Stop and Supermarket (Note footpath between 59 and 61 Chiltley Way reduces walking distance by 200m with more direct route). Stated that this site “Scores above average” in the accessibility matrix – how calculated?

Transport and Movement – Potential for cycle and walking to train station and buses; however, some narrow pavements and pinch points causing safety concerns for those with additional mobility requirements. Midhurst Road Rail Bridge and approaches would need to be made safer for pedestrians and cycles by traffic calming and footpath/crossing improvements. Access to A£, vehicular impact on The Square, increased vehicular movements through existing residential areas. Would generate need for additional community facilities.

The EHDC Plan provides for Net Zero homes consuming no more energy annually than generated. Would be an expectation on site of this size.

Character heritage and design - Careful use of Design Codes necessary to integrate with adjoining developments. Chiltley Way Area is classed as Site of Special Housing Character in EHDC Plan. Neighbourhood Character Area Study December 2018. These characteristics should inform any future development proposal. Trees from the arboretum at Chiltley Place and some outbuildings are “historic remnants”. The Berg development has a strong identity in terms of architectural design and layout.

Environment and Green Space - “Impacts on the environmental constraints (biodiversity, flooding and landscape) could be avoided by nearby provision of suitable alternative natural greenspace” – Where would this be located? Chiltley lane and Midhurst Road to a lesser extent, retain a rural feel and existing trees and hedgerows should remain. Note site is adjacent to SINC and Tree Preservation Orders in place. Site should incorporate potential for allotments and community growing spaces. Para 8.68 p 205 states that “New residential development in the local plan will be required to include a level of new open space and recreation provision to meet the developments needs without adding undue pressure on existing facilities”. Has this been factored into the density/ housing numbers equation for each site?

Policy BL 18 para 8.10 confirms that Liphook surgery is too small and needs investment to meet growing pop – so proposal to support from 106 funding welcomed. Under Policy HWC1:2 it is noted that a Health Impact Assessment would be required for this site.

Additional Requirements identified by the emergent Neighbourhood Development Plan

- Additional pedestrian bridge over railway line to assist with 20 minute neighbourhood expectation. A safe potential point for this would be over into East end of manor Fields via the band of trees.

- Adjacent Site BL11 (LAA/LIP-020-Land at Devils Lane) coming forward would improve vehicular access points if considered as a comprehensive development, requires improving two way vehicular access over existing bridge.
- SANGs land.

Additional community views/comments not covered above (public event 2022)

- No support for development of this site within South and East Liphook Residents Group.
- Some of community supportive of Neighbourhood Development Plan approach to site development in relation to adjoining sites.

General

Proposed density per hectare 15 homes per hectare. Comparison of site area with established development to the East demonstrates density is too low. Target should be 20-30 Homes per Hectare minimum. Refer to Distinctively Local (<http://www.distinctively-local.co.uk/storage/app/media/Distinctively-Local-Fnal-Report.pdf>) Case studies for good examples. This site should only be included at >20 homes per hectare therefore delivering 90 plus homes.

Pages 411 and 412 maps show LIP3 Land at Chitley Farm but are headed LIP2 Land west of Headley Road, Liphook.



EHDC Local Plan – Chitley Farm. Key features.

3. Land West of Headley Road (Site matrix reference LIP-012)

This has a site area of 1.6 hectares with 20 proposed homes. At 12.5 homes per Ha this is significantly below target density as defined by CPRE and best practice guidance on settlements classified as Local Neighbourhood Centres. Thus, comparison with established development to East shows density is too low. Target should be 30 home per hectare minimum refer to Distinctly Local website as above. Thus, this site should only be included at >20 homes per hectare delivering 32+ homes.



EHDC Local Plan – Headley Road site with comparison housing density added.

AECOM Site assessment. Previously allocated under strategic land assessment of withdrawn emerging Local Plan. Site adjoins settlement boundary, area TPO, noise considerations, well contained and bounded, follows linear development pattern, coheres well with Liphook settlement pattern.

Note EHDC state that also “scores above average” on the accessibility matrix but again how calculated is not clear. Better connectivity through Headley Road but leads through to identified vehicle pinch-point (See BLNDP Fig 19 Key Movement Routes). Well outside 10 minute walkability guide. General comments for the other two sites also apply.

General issues not related to site allocations

- There is a lack of reference as to how Neighbourhood Plans fit with/complement the EHDC Plan. The BLNDP matches across many of the EHDC subject areas providing the local perspective and representing the needs/ambitions of the local community.
- Note that all things being equal, the BLNDP will come into effect 12 months before the EHDC Local Plan and Revised Settlement Policy Boundary.
- What is the criteria for determining a “Strategic Employment Site” – why are there none in Liphook ? - Industrial Estate opposite Station? Beales Yard.
- The draft/emergent BLNDP provides additional qualitative data about local needs and pressure points.
- Policy NBE8 at 95 litres a day seems higher than national standards and will not address increasing water scarcity.
- Note infrastructure plan DGC1.1-1.6 for rail crossing to Chiltley Farm site and SE Liphook future sites.
- Policies for net zero, and where other applied standards exceed normal Building Regulation expectations, often carry caveats for the developer allowing them not to comply if “technically difficult” etc. These should be reviewed and tightened wherever possible to close down developer “wriggle room”.
- Policy DM2(11.16) should include provision of adequate root space using industry standard calculations. Trees in developments must include large canopy species along- side other forms.
- BLNDP identifies specific heritage and visual assets for the parish. Effect of prescribed garage sizes and residential parking.
- Liphook is identified both as a District Centre (The Square) and a Local Centre (Station Road). This sets up a two- tier approach to permitted development. Basically the former “should be sustained to ensure it provides for main and bulk convenience food shopping and an appropriate range of facilities and services” whilst the latter “should be sustained to provide basic food and grocery.....lower order goods and a range of non -retail services and community uses” See Policy E5 Retail Hierarchy. Distinction seems arbitrary especially as two centres are effectively “bridged” by Sainsbury’s. BLNDP Policy BL20 provides more generically for a mix of shops in the retail core of Liphook.
- The EHDC Plan is silent as to how/when a tipping point would be reached. Does not provide for the measurement of cumulative impacts on infrastructure etc. For example – Health Impact Assessments for 50 plus home developments but what if there are three 20 home sites?
- Note Statement that “Food store retail provision is reasonable....in Liphook” Para 3.20
- Parking standards – minimum cycle parking for 4+ dwellings is inadequate. Cycle spaces should be required per bedroom over 2. The standard continues to favour car use over active travel as defined. Cycle parking or scooted parking at educational establishments is inadequate. Table should ensure that every pupil could cycle to school if desired. This is how to enable active travel. The space should be allocated even if the hoops are not provided on day one. Generally, playing fields should allow for all local users to park a cycle securely (currently 1 space per pitch).
- It is recommended that EHDC review CAM Cycle Cambridgeshire Guidance for active travel targets.
- They might also refer to SDNP Guidance and ensure that cycling is a preferred option by enabling access directly and not tucked behind cars with limited space to move.

- Parking and climate emergency – Parking arrangements do not show how adequate GI can be incorporated. They currently risk creating a design code or reference that fails to deliver on street tree planting. Policies should be redrawn to provide examples of similar parking with street trees planned into the layout to reinforce environmental policies.

Bramshott and Liphook Neighbourhood Plan Steering Group - 14th February 2024



3rd March 2024

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

Four Marks Parish Council Response to Draft Local Plan Consultation

The Parish Council fully supports the representation (attached) of the Medstead and Four Marks Neighbourhood Plan Steering Group and would like to emphasise the following points covered in more detail in the NPSG representation.

1 Objection to the proposed Settlement Hierarchy

The Council strongly objects to the allocation of Four Marks as a Tier 3 site when the 'Ridge' method indicates that Four Marks should fall within Tier 4. If an independent assessment of the settlement hierarchy is undertaken, then the findings should be observed and followed. The use of population to manipulate the Tier system is unacceptable and undermines the data and findings of Ridge.

2 Allocated Sites

The Council objects to the proposed quantum of allocated housing across the Four Marks/ 'South Medstead' settlement of 210 dwellings and 120 distributed between the combined sites in Four Marks. When reading your document '*Revised Settlement Hierarchy Background Paper, January 2024*', there appears to be an unfair and disproportionate allocation of housing within the Tier system. For example, although the Council is not willing to accept the allocation to Tier 3, if the placement is to stand then the allocation of 120 sites versus 0 in Grayshott, 20 in Bentley and 19 in Holt Pound seem unfair and disproportionate.

The Council is willing to support an allocation of new housing to Four Marks Parish, but it must be done in a fair and even handed way. The current allocated sites must have the mitigation measures identified for each allocation to make them accessible, sustainable, affordable and meet climate objectives otherwise they will not be supported. All the proposed current allocations have low accessibility



scores. The Council would welcome discussions on alternative sites in Four Marks if available that have higher scores.

The Council strongly objects to the SPB being amended to include the allocated sites or other SPB changes before the Local Plan is adopted and reserves the right to agree changes to the allocated sites should any of the speculative applications and appeals be granted so as to not to over deliver as has been the case in the past.

The Council is aware that the appeal *APP/M1710/W/23/3329928 56082/004: Mount Royal, 46 Lymington Bottom, Four Marks, Alton, GU34 5AH* is about to be adjudicated (due w/c 7th March), we ask that, if the Inspector finds against the Council, the 60 dwellings will be set against the number required by the settlement to contribute to EHDC's total housing requirement 2021 to 2040.

3, Land to rear of 131 Winchester Road

The Council considers that the inclusion of this area within the Settlement Policy Boundary is unacceptable due to the status of the perimeter hedgerow of a SINC. It also notes that there are several TPO's in this area. Even if the border of the area was retained, there would still be unacceptable damage to wildlife and biodiversity through the disruption of the perimeter. The change to the existing SPB is contrary to the new Chapter 05: *Safeguarding our Natural and Built Environment: Policy NBE2: Biodiversity, geodiversity and nature conservation*' and therefore must not be implemented.

The Council also notes that the direct access onto the A31 would be too narrow to allow safe passage and so alternative access would need to be cut through the SINC in one direction or another.

4, Land South of 4 and 5 Gloucester Close

Storey's Piece has long been considered an important area by Four Marks and its District Councillors before 1996. For this reason, the M&FMNP drew a SPB around the site.' The area has the designation as an area of informal Public Open Space and has been protected for a number of years through efforts from local residents and the Parish Council.

The Council objects to any changes to the Settlement Policy Boundary that would include this area and to any reclassification. FMPC would like to discuss with EHDC any additional measure to protect our open space. Within the Interim Settlement Policy Boundary Review Background Paper 2024, it is clearly stated that Settlement Policy boundaries will exclude Open Spaces.



5 Minor Changes to SPB

The Council accepts the proposed minor alterations to the Settlement Policy Boundary but insists that these are not implemented until the Local plan is adopted.

6 Land South of Winchester Road

The Council has concerns about the sustainability and accessibility of this site and considers that there should be various measures put in place if this were ever to be developed including:

- Multi-purpose community building in close proximity to Four Marks Recreation Ground or enhancement of existing provision (Benians Pavilion)
- A shop with adequate parking which is visible and directly accessible from the A31 to catch passing trade. Any shop would need to have good visibility and access in order to be viable.
- Houses must be truly affordable, must include greater than 40% social housing, and support the local need for 1-, 2- and 3-bedroom dwellings.
- Insulation level must achieve 15kWhr/m²/yr as a minimum.
- On site generation (PV) must use all available roof space
- Provision of a cycle way to link to the existing one on Winchester Road, linking to Lymington bottom and extension to Oak Green and Lymington Barns.
- Cycleway/pedestrian access to Gradwell lane for easy access to school with improvements to Gradwell Lane itself. There would need to be a safe pedestrian path/cycle way for passage to the School.
- Cycleway and pedestrian access to Recreation Ground.
- Direct Access via A31 and not via Pheasant Close
- Improvements to healthcare infrastructure would be needed.

7 Land Rear of 97 to 103 Blackberry Lane

The Council notes that there would need to be at least the following measures in place to make this site sustainable and accessible.

- There would be additional pressure on the road junctions at the top and bottom of Blackberry Lane (turning onto Lymington Bottom and Telegraph Lane). Mitigation would need to take place in order to make the added pressure acceptable.



- There would be added congestion and pressure onto the A31 Highway Junctions from Lymington Bottom Road and Telegraph Lane. The additional traffic caused by the development would automatically result in more traffic and junctions which are already congested. Mitigation would need to take place in order to make the added pressure acceptable.
- Housing would need to be truly affordable and include greater than 40% social housing and support the need for 1,2 and 3 bedroom dwellings.
- Insulation level must achieve 15kWhr/m²/yr as a minimum.
- On site generation (PV) must use all available roof space
- Provision of cycle/pedestrian connections to Oak Green and Lymington Barns.
- Improvements to healthcare infrastructure would be needed.

8 Boundaries surgery extension.

Although there is a bus route with a nearby stop, the site has minimal parking, which already causes congestion in its car parking area.

Whilst considering all the above points, the Council implores any policy changes to reflect the Ridge Living Locally Accessibility methodology in that the changes encompass Living, Working, Supplying, Caring, Learning and Enjoying. The need for affordable housing is linked to the supply of jobs for local people who can afford to live in the area and be a meaningful part of the Four Marks community.

Yours sincerely

Chairperson.

**MEDSTEAD & FOUR MARKS
NEIGHBOURHOOD PLAN**



**East Hampshire District Council
Draft Local Plan 2021-2040 (Regulation 18)
Consultation
Response submission from Medstead & Four Marks
Neighbourhood Plan**

March 2024



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East Hampshire District Council

Draft Local Plan 2021-2040 (Regulation 18) Consultation

Response submission from Medstead & Four Marks Neighbourhood Plan

01 INTRODUCTION TO PAPER

This paper has been written in response to the publication of the EHDC Draft Local Plan 2021 to 2040 Reg 18 – 2 Consultation.

It has been developed from a working party including representatives from:

- Chawton Parish Council
- Four Marks Parish Council
- Medstead Parish Council
- Local Interest Groups:
 - Fight for Four Marks (F4FM)
 - Stand with Medstead Against Speculative Housing (SMASH)
- EHDC District Councillors
- Medstead & Four Marks Neighbourhood Plan Steering Group

The NPSG responds from the area of its locality the Parishes of Chawton, Four Marks and Medstead, covering the settlements of Medstead Village and Four Marks/ 'South Medstead'.

The NPSG requests that in formal documents that the land in the Chawton, Four Marks and Medstead Parishes that EHDC have defined as the settlement of Four Marks/ 'South Medstead' is referred to as **Four Marks/'South Medstead'**.

The NPSG is in agreement with a large number of elements of the Draft Local Plan but to fully support it at the Regulation 19 stage, it believes that there are some 'logical' inconsistencies that must be resolved by EHDC to engage its support; and the following points must also be addressed and agreed.

1. The NPSG has calculated that the proposed quantum of houses is far higher than needed by the District, and it is unclear why additional contingencies have been applied to arrive at the suggested number needed (9,082). From the calculations made by the NPSG, a realistic figure of 8,439 is suggested, produced by removing the arbitrary contingency of 643.

The reason given by EHDC for including the 643 contingency is to allow for adjacent requirements from SDNPA, etc. However, the NPSG do not believe that the addition of 3,857 as part of the affordability ratio does not reflect any local need, because it provides housing above the 'local need' which will just be consumed by migration from surrounding areas. The contingency as it is stated is double counting and should be removed, adjusting need to 8,439.

2. The NPSG are encouraged to note the scientific research to the Settlement Hierarchy methodology, as detailed in the *Revised Settlement Hierarchy Background Paper by East Hampshire Living Locally Accessibility Study and Decide & Provide Methodology (Ridge & Partners Report 1)*¹, is accepted. It places Four Marks/ 'South Medstead' in Tier 4, before the subjective decision to adjust a Settlements placing in the Hierarchy by considering the population of the settlement, which elevates Four Marks/ 'South Medstead' to Tier 3.

Scientifically, the EHDC consultants have proved that Four Marks/'South Medstead' sits in Tier 4. The subjective move to Tier 3 has no logical justification.

EHDC should realise that the relationship between a settlement's population and its infrastructure follows an 'inverse law'. The logic behind this 'law' is, that for its base data the community has been assessed as to its infrastructure, and for those hexagons, on the overlay covering the settlement, has produced an average score for the settlement.

However, as a community expands by increasing its population, and new developments increase the number of settlement hexagons covered by the 'grid', with no increase in the infrastructure/ facilities 'within walking distance' of a resident's dwelling, the Ridge & Partners score must reduce, because by creating a lower sustainability factor and lower the accessibility score, naturally would lower the Tier, not increase it.

The NPSG refutes this subjective process and thus the decision to reorder the Hierarchy in this way is not acceptable. Four Marks/'South Medstead' should remain in Tier 4 until the Four Marks/'South Medstead' score, accessed using the Ridge & Partners methodology, improve to 16 by the addition of the appropriate infrastructure.

3. The Settlement Policy Boundary (SPB) is not part of a Housing Land Supply Policy, as noted in Supreme Court judgement '*Suffolk Coastal District Council v Hopkins Homes Ltd & Richborough Estates Partnership LLP v Cheshire East Borough Council [2017] UKSC*'².

"Local Plan policies restricting development in the countryside and seeking to encourage new development only within the settlement boundaries are not "policies for the supply of housing"

This judgement leads NPSG to believe that the setting the SPB should not be part of the Local Plan process. It is noted that previously had been the subject of a separate consultation.

¹ EHDC Portal: EHDC DLP Supporting Papers: East Hampshire Living Locally Accessibility Study and Decide & Provide Methodology

<https://www.easthants.gov.uk/sites/default/files/2024-01/D%26P%20Transport%20assessment%20methodology.pdf>

² Suffolk Coastal District Council (Appellant) v Hopkins Homes Ltd and another (Respondents) Richborough Estates Partnership LLP and another (Respondents) v Cheshire East Borough Council (Appellant)

<https://www.supremecourt.uk/cases/docs/uksc-2016-0076-judgment.pdf>

This Interim SPB report must be the subject of another consultation and be adjusted in cooperation with the Parish Councils before the Local Plan is adopted or when an updated Neighbourhood Development Plan is applied, and not before.

4. The NPSG has concerns regarding the ground water and surface water drainage and surface water runoff. The Four Marks/'South Medstead' geology is a clay cap over chalk with some areas designated as SPZ.2 which gives rise to extreme difficulties in designing drainage schemes that comply with the LLFA that are both sustainable and economic.

The NPSG believes that the Four Marks/'South Medstead' settlement has reached the infiltration limit where a new development cannot guarantee that there is not a risk of flooding, due to the currently experienced surface water runoff in the area.

Predictive models for climate change forecast wetter and more extreme weather events for the UK. This prediction along with the destruction of natural drainage by housing developments and the particular hydrology of Four Marks/South Medstead clay cap requires additional validation.

All sites in Four Marks/'South Medstead' settlement should have a drainage viability assessment made before being added to the LAA.

5. In addition to the flooding there are concerns on sustainability. The NPPF states:

" 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;"

The previous overdevelopment has already resulted in low sustainability. Various Inspectors have comment at Appeals that the infrastructure of Four Marks /'South Medstead' has not kept pace with development, as noted within the NSPG response. Adding further development, creating even lower sustainability scores, does not make any sense and is contrary to the NPPF. Site allocations in the Parishes should be reduced until the sustainability scores are improved by the provision of additional infrastructure.

6. The NPSG has considered the Allocated Development sites within the Parishes of Medstead ad Four Marks, and notes that the Parish Councils have listed for each proposed site a number of infrastructure changes needed to make the sites Ridge & Partner scores acceptable.

The NPSG recommends that the proposed site allocations should not go forward to gain planning approval until a fully funded legal commitment is in place to carry out these works.

02 VISION AND OBJECTIVES

The NPSG supports the ambition expressed in the Vision and the Objectives. The NPSG particularly welcomes the phrase 'quality affordable homes' that is included in the Vision. The NPSG suggests that this point is also made explicitly in the Objectives.

03 MANAGING FUTURE DEVELOPMENT

Local Plan Objectives

Objective A – providing sustainable levels of growth through the Local Plan

The NPSG is in broad agreement with the objectives outlined in the above. However, the NPSG would suggest a small amendment to the wording in A3:

“Ensure our defined town and village centres provide a range of retail and associated activities to maintain and improve their vitality and viability **in keeping with their local character.**”

The NPSG has reviewed the policies regarding ‘Managing Future Development ‘

Policy S1 – Spatial Strategy

Policy S1.1 Housing

The NPSG believes that the figure of 9,082 new homes over the plan period is too high. This figure includes substantial over-provision as a result of the limited number of houses to be built in the SDNP area as well as the distortions created by the Affordability Ratio. In this context, the NPSG believes that the additional buffer of 643 that has been added to the Plan is unnecessary and should be removed.

The NPSG understands that EHDC has an obligation, to help SDNP with unmet housing need (paragraphs 3.8, 3.9) and note that the LPA states that the SDNP itself will supply 1,900 dwellings over the plan period (100 x 19 years) leaving an anticipated shortfall of 266 dwellings (14 x 19 years). However, EHDC should make this an **upper cap**, i.e. *the maximum number that the LPA is willing to accommodate on behalf of the SDNPA*. This is in order to strongly encourage the SDNP planning authority to meet as much of their own needs as possible and thus not rely on the LPA, by default, if they fall short of their own targets during the plan period.

Paragraphs 3.10, 3.11 discuss potential unmet need from other areas, in particular the Partnership for South Hampshire (PfSH). The NPSG would suggest that as the affordability ratio used in the standard method increases the number of dwellings by 3,857, over and above the predicted household growth for EH, then this number reflects “in migration” into the district. Surely then, this includes “in migration” from the PfSH area outside of EH, therefore a proportion of this unmet need is already accounted for in this 3,857 figure.

Due to a change in the National Planning Policy Framework (NPPF) Dec 2023, Para 61 states, “*The outcome of the standard method is an advisory starting-point for establishing a housing requirement for the area.*” That is, the calculated figure is no longer a compulsory one. This change should be clearly stated in this section.

The NPSG also believes that there should be full transparency of how the housing number is derived. Instead of just quoting the overall minimum number of houses required over the plan period, (9,082 in the LPA), it would be very useful to have a table included that shows exactly how this figure is calculated. Also, it should include

clear justification for any “adjustments” e.g. overages that have been included. See Appendix 03

Policy S1.2 Employment and Retail Sites

The NPSG agrees that existing employment sites should be safeguarded, and that the implementation of additional proposed sites as listed in Chapter 12 and those with extant planning permission should be encouraged.

Furthermore, the NPSG welcomes the specific involvement of Neighbourhood Plan Groups in the allocation of potential employment land where there is proven identified local need.

The NPSG believes that **more** employment floorspace should be included in the appropriate places, (primarily in the higher Tier locations, where most of the population is located or settlements with good transport links (e.g. buses, trains, safe cycling.) This is because all the additional dwellings (over and above the objectively assessed local **baseline** need), simply brings in more people from outside the District, who then continue to commute to their original places of work as local employment opportunities have not been proportionately increased. This results in more greenhouse gas emissions from vehicles, contrary to the Council goals regarding the climate emergency.

However, there seems to be some conflicting data that should be further explored. When you consider the proposed future population growth in the District, there does not appear to be a significant additional need for employment locations, as although the population of the LPA area is predicted to increase by 5.7% from 2021 to 2038 (HEDNA 2022), the 16 to 64 year age group (majority of the working age population) is predicted to decrease by 4.0%.

The NPSG would suggest that this data does not align with the additional number of houses (3,857) that are being proposed over and above the objectively assessed baseline need. These houses are included in the “*The Standard Method*” for calculating the overall housing requirement as a result of the use of the Affordability Ratio algorithm. These additional dwellings are primarily for people “migrating” into the area. Of course, some of these new residents will be older, retired people, but people of working age will most likely come too. However, with no policies to significantly expand the employment opportunities here, then the majority of these new working residents will simply drive to their jobs outside of the District, as many do now. As the DLP is trying hard to include policies which will lead to a reduction in the amount of CO₂ emissions, then surely it must also include employment policies that will encourage the expansion of local job opportunities, in order to reduce the currently high figure of CO₂ emissions due to transport (43%)³.

The NPSG agrees with paragraphs 3.29, 3.30 and 3.31 along with the listed hierarchy of centres (Policy E5). It is important to minimise vacant premises in order to maintain

³ The NPSG notes that the **EHDC Portal: EHDC Welfare and Wellbeing Strategy 2024 – 2029**, page 12, published as part of its consultation of the strategy document, has a conflicting figure of 39% for transport emissions. <https://www.easthants.gov.uk/sites/default/files/2024-01/Welfare%20and%20wellbeing%20strategy%20draft%202024-2029.pdf>

the vibrancy and vitality of all the retail centres, both large and small. Any new retail development should be in keeping with the local character of the settlement where it is being located.

S1.3 Gipsy, Traveller and Travelling Show People

The NPSG agrees that provision should be made for Gypsies, Travellers and Showpeople. However, the target of 2 permanent pitches for Gypsies and Travellers seems very low when the identified need is for 66 pitches according to EHDC *5-Year Supply of deliverable land for Gypsy, Traveller and Travelling Showpeople Accommodation - Mar 2023* and not in line with the proposed allocations in Chapter 12 which amount to 14 sites (6 at Neatham Down, 6 in Headley Down and 2 in Four Marks).

Policy S2 Settlement Hierarchy

Policy S2.1 - Proposed locations of Allocated Sites

The NPSG broadly agrees that the spatial strategy as shown in the DLP Figure 3.1 Key Diagram, which indicates in Policy H1:

‘ Housing Strategy identifies a broad distribution of new housing that follows the settlement hierarchy by distributing more new homes to the higher tiers of the hierarchy where development is to be located, is generally aligned with the Settlement Hierarchy, such that the greater proportion of development is sited in the larger and more sustainable settlements. ‘

The NPSG supports the proposed allocation strategy of strategic sites, together with the logic for developments at Neatham Down and Bordon that are adjacent to the largest and most sustainable settlements in the LPA area.

The NPSG believes that the delivery of such sites are crucial for the success of this Local Plan but have grave concerns regarding the final logic on setting the Settlement Hierarchy using a subjective judgement that the local population is a common factor in supporting the ‘viability’ of a settlement. The NPSG considers this philosophy flawed, and it does not produce a true Settlement Hierarchy for the District outside the National Park.

Policy S2 – Settlement Hierarchy

Policy S2.1 Need for Settlement Hierarchy

The NPSG agrees that an appropriate, data led assessed settlement hierarchy should be used as a framework for the LPA to meet the required level of development, whilst sustaining the vitality of the settlements.

Policy S2.2 Settlement Hierarchy

The NPSG supports the concept as described in paragraph 3.32, “*The scale of development proposals will be expected to be relative to the existing or proposed level of facilities and services in the settlement, together with their accessibility.*” This should ensure that development is directed to the most sustainable settlements.

Overall, the NPSG supports the revised settlement hierarchy listing as it appears to be based on a more detailed and realistic evaluation of each location. The NPSG is pleased that the Council has listened and acted on our very real concerns particularly about Four Marks/‘South Medstead’ from the 2022 EHDC Regulation 18 - 1 Issues & Priorities consultation.

The NPSG also notes that nowhere in the *Revised Settlement Hierarchy Background Paper*⁴ or in the supporting documentation are the Tiers defined or classified as service centres, urban centres, etc. The NPSG therefore finds that the Tier calculation is at present simply incomplete.

Without this definition/classification, no evaluation of the impact of these Tiers on “attitudes” toward development in the area can be assessed. The NPSG believe that this is a glaring omission.

The *East Hampshire Living Locally Accessibility Study and Decide & Provide Methodology Report 1: East Hampshire Accessibility Study*⁵ notes that Appendices A1 to A12 refer to a workshop that took place on 19th July 2023, where alternative methodologies or the accessibility study were presented by Ridge & Partners to and discussed with:

- East Hampshire District Council
- Hampshire County Council
- Urban Edge Environmental Consulting

Within the Appendix A.12 *Discussion, Conclusions and Recommendations* paragraph A.12.3 states, for Four Marks, a particular score is achieved for one of its assessments due to “..... *the small variety of facilities within a 15-min walk or cycle.*”

The Appendices shows data for the retail and some leisure facilities in Four Marks/‘South Medstead’ together within Alton. It can be clearly shown that by taking into account the differing populations of the two settlements, then Four Marks/‘South Medstead’ has limited facilities in comparison to the size of its population.

Additionally, it is important to understand the reason why the accessibility score for Four Marks/‘South Medstead’ is low. It is due to intense development over the last few years, with very little additional infrastructure/facilities and a very dispersed settlement character, spreading out 3 km along the A31 trunk road. So, while the

⁴ EHDC Portal: EHDC DLP Supporting Papers: Revised Settlement Hierarchy Background Paper para 5.18, page 17 <https://www.easthants.gov.uk/sites/default/files/2024-01/Revised%20settlement%20hierarchy.pdf>

⁵ EHDC Portal: EHDC DLP Supporting Papers: East Hampshire Living Locally Accessibility Study and Decide & Provide Methodology <https://www.easthants.gov.uk/sites/default/files/2024-01/D%26P%20Transport%20assessment%20methodology.pdf>

population is “high”, the accessibility score is indeed low, and de facto, people use their car to access both the local village services and the services that are not present in the village e.g. sports centre, large supermarket, library, bank, station etc, all at Alton, 7km away.

The NSPG has a continuing concern regarding ongoing unsustainable over development within certain settlements with virtually no increase/improvement in infrastructure or facilities, e.g. Four Marks/‘South Medstead’. *The Revised Settlement Hierarchy Background Paper* notes

‘ Settlements that are in a higher tier of the hierarchy will often be more sustainable locations for new development, because new residents would be able to access a greater range of services and facilities more easily, without the need to travel large distances by car.’

which has not been confirmed by the Accessibility Score methodology, used before ‘settlement population’ adjustments were made as there are obvious inconsistencies.

The current Local Plan JCS (2014) set a minimum housing requirement of 175 up to 2028. As of 2023, there have been approximately 571 dwellings built, with an additional 71 with Planning permission. This Draft Local Plan is proposing a further 210 dwellings on top of those already built or planned, some 862 in total.

Additionally, the NSPG is aware of numerous developers wishing to put forward speculative applications, some already in the Planning system (amounting to hundreds more dwellings). With development since 2014 in this proposed Tier 3 location could well top 1,000 dwellings within the early years of the new Plan. This could be considered extremely excessive, particularly as facilities and employment opportunities are limited, as there has been minimal change during the current Plan Period.

Furthermore, as a result of such a scenario, the number of vehicles have and will significantly increase, contrary to the Council’s *Safeguarding our Natural and Built Environment* Policies climate change goals, particularly as the wider facilities (supermarkets, sports centre, train station, senior schools, etc.) and employment opportunities mainly away from the village the closest being over 7 km away in Alton.

However, the NPSG is concerned about the use of settlement population to move certain settlements either up or down the Tiers without true data driven justification, especially if they are close to a Tier boundary. The argument for this seems rather arbitrary and moreover undermines the *East Hampshire Living Locally Accessibility Study and Decide & Provide Methodology*(Ridge & Partners Report 1) scoring system completely.

The population argument that is cited in the *Settlement Hierarchy Background Paper*, i.e.

“ where population levels appear to be relatively high given a settlement’s accessibility score, this has been interpreted to indicate a good potential to maintain or even enhance accessible service provision over the time period of the Draft Local Plan. Therefore, settlements that are at the top of one Tier in terms of an

accessibility score could be promoted to the next Tier up in the hierarchy. Correspondingly, where population levels are relatively low given the settlement's accessibility score, this has been interpreted to indicate a lower potential to retain/enhance service provision, such that settlements at the bottom of one Tier could be demoted to the next Tier down."

Following this reasoning, the NPSG notes that once again (as in 2023 *Settlement Hierarchy Background Paper*), Four Marks/'South Medstead' is singled out to have its scored Tier rating modified adversely (i.e. upwards). The NPSG notes, for example, in figure 5 of the latest *Revised Settlement Hierarchy Background Paper* ⁶ 2024 that Four Marks/'South Medstead' (13,92) has an 'identical' score to Ropley (13.87) i.e. comfortably within Tier 4 using the numbering system noted in of the Hierarchy document, but has then elevated a Tier because of 'population'. There is simply no justification for promoting Four Marks/'South Medstead' to the next Tier, it is NOT close to the lower boundary of Tier 3 set at a score of 16.00. The same discussion applies to Rowlands Castle.

The NPSG strongly believes Four Marks/'South Medstead' should remain in Tier 4 to reflect the **TRUE** character of the settlement. By promoting it in the hierarchy EHDC is indicating to developers that it is suitable for the siting of considerably more houses, which will exacerbate the existing accessibility issues and increases car usage.

At Appeal, several inspectors, (see Appendix 3A) have stated that additional housing alone, would not reinforce the vitality of the settlement as large numbers of houses have already been approved without any enhancement of the facilities. The NPSG believes that special consideration (i.e. less housing proposed until more facilities/infrastructure are in place) should be given to settlements who find themselves in this situation i.e. "high" populations and limited facilities.

However, the NPSG is very surprised that Grayshott (Tier 3 settlement) adjacent to Hindhead and Haslemere, has not been allocated any new houses for a second time (no proposed sites in "Housing and Employment Allocations 2016). The NPSG knows it has a vibrant village centre, along with numerous additional facilities, e.g. dental practice, a Public House, a Post Office, meeting halls, churches, pre-school, etc. In addition, it does have an affordable housing need and there are identified sites on the LAA.

We are aware that when considering the development is not sustainable, unlike para 3.38 which although not actual policy, states that all Tier 3 settlements are "sustainable". How this is derived is also in question.

The NPSG notes that the *East Hampshire Living Locally Accessibility Study and Decide & Provide Methodology*(Ridge & Partners Report ¹⁷) identifies that Grayshott has 2 sites on the LAA:

⁶ EHDC Portal: EHDC DLP Supporting Papers: **Revised Settlement Hierarchy Background Paper** para 5.18, page 17
<https://www.easthants.gov.uk/sites/default/files/2024-01/Revised%20settlement%20hierarchy.pdf>

⁷ EHDC Portal: EHDC DLP Supporting Papers: **East Hampshire Living Locally Accessibility Study and Decide & Provide Methodology**
<https://www.easthants.gov.uk/sites/default/files/2024-01/D%26P%20Transport%20assessment%20methodology.pdf>

- LAA/GRY -004 Land north of Applegarth Farm, Grayshott - 45 dwellings with an average score of 6 on the *East Hampshire Living Locally Accessibility Study and Decide & Provide Methodology*(Ridge& Partners Report 1)
- LAA/GRY-006 Hunters, Headley Road, Grayshott, GU26 6DL - 9 dwellings with an average score of 11 on the *East Hampshire Living Locally Accessibility Study and Decide & Provide Methodology*(Ridge& Partners Report 1).

Comparing the *East Hampshire Living Locally Accessibility Study and Decide & Provide Methodology*(Ridge& Partners Report 1)scores for the 3 proposed housing sites in Four Marks/'South Medstead'

- MED-022 – average score 8
- FM-015 – average score 8
- FM-013 – average score 11

The NPSG would suggest that the scores for sites in the two settlements are not significantly different, when you consider that the range of average scores ranges from 3 to 22.

The NPSG also notes that the following settlements, all in Tier 3, are not listed in Figure 5 of the Revised Settlement Background Paper January 2024

- Bentley, which scores 16.7,
- Holt Pound which scores 16.6 and
- Headley which scores 15.6.

Is this due to difficulties obtaining accurate population figures, or is it an oversight?

Hampshire County Council Comment to EHDC Planning Application 52254

The NSPG would like to draw EHDC's attention to Hampshire Highways response to Planning Application 52254 | *Outline planning application with all matters reserved except for means of access up to 95 dwellings to include the provision of vehicular access point, public open space, landscaping, sustainable drainage systems (SuDS) and up to 2,100 m2 of land in a flexible Class E(e) (Commercial, Business and Service) and Class F2(a) (Local Community) use. | Land North East of Belford House, Lymington Bottom, Four Marks, Alton*⁸.

In its recommendation to the EHSC Planning Officer to the application on Lymington Bottom, Hampshire Highways notes:

'The Highway Authority have significant concerns regarding the sustainability of the proposed development and requires the additional information and assessment work noted within this response. Should EHDC choose to determine the application ahead of this information being provided, the Highway Authority should be contacted for its reasons for refusal.'

With the response, Hampshire Highways review Four Marks/'South Medstead' against its emerging Transport Policy LT4:

⁸ EHDC Planning Portal Planning Application 52254 | **Outline planning application with all matters reserved except for means of access up to 95 dwellings to include the provision of vehicular access point, public open space, landscaping, sustainable drainage systems (SuDS) and up to 2,100 m2 of land in a flexible Class E(e) (Commercial, Business and Service) and Class F2(a) (Local Community) use. | Land North East of Belford House, Lymington Bottom, Four Marks, Alton Highways Authority response.**
https://planningpublicaccess.easthants.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=EHANT_DCAPR_255059

'Transport Policy

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 them from using these modes instead of their cars. Whilst Four Marks has a cluster of key facilities and services fronting the A31 and the adjoining Lymington Bottom Road such as grocery stores, bakery, restaurants, pharmacy and doctor's surgery, the accessibility of these facilities is reduced predominantly because of the severance and traffic dominance created by the road.

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 that HCC is proposing to adopt in its new Local Transport Plan (LTP4). 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 roadspace and managing vehicle access in specific locations. 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.'

It goes on to note:

'The settlement hierarchy justification is set out within the East Hants Local Plan evidence base to the Reg 18 consultation. Whilst Four Marks and Medstead is noted to have a higher than the median score for accessibility for the district it is not the sole determining factor for the proposed settlement hierarchy, but it informs the decision-making process around the existing accessibility level of an area and the likely levels of supporting infrastructure/services which would be required to support development. For Four Marks/' South Medstead' it is noted that due to the linear settlement pattern the peripheral areas within the settlement fall beyond the walking and cycling catchments for many of the local service and was therefore initially placed in Tier 4, however due to other consideration factors was moved to Tier 3, permitting some development in Four Marks.

Given the site's location, the Highway Authority have significant concerns regarding the sustainability of the proposed development, particularly in relation to the walking distances to local facilities within Four Marks. Active Travel England (ATE) identify that a site should have access to a sufficient number of amenities within an 800m walking distance via an accessible walking route.

... only a park or green space, indoor meeting place and primary school are available within the 800m walking distance. The remaining facilities are over 1km away from the site and, in some cases, require crossing the A31. Most of the facilities are above the 'elsewhere' maximum walking distance identified within the CIHT Providing for Journeys on Foot document such as the nearest coffee shop, surgery, post office and also local convenience store (Tesco Express). Consideration must also

be given to access to Secondary School provision, reasonable employment opportunities and the level of service that is offered by the facilities within the accessible area and wider immediate vicinity of the site, and how they may be accessible by sustainable modes.

Given the number of live planning applications in the Four Marks area, and also the traffic flow associated with this application (which are yet to be determined, but will be in excess of the figures presented within the TA), the Highway Authority has been requesting a cumulative traffic impact assessment at the A31/Lymington Bottom staggered crossroads. As the latest application to come forward in the area, the Highway Authority requires modelling of this junction once the traffic flows and distribution split have been agreed.⁹

After considering the content of the Hampshire Highways response, the NPSG urges EHDC to revisit their decision to raise the Four Marks/South Medstead settlement from Tier 4 to Tier 3 on the ground of settlement population alone.

Policy S2.3 Presumption of Sustainability

The NPSG is in favour of the Tier 1 and Tier 2 settlements having updated Settlement Policy Boundaries (SPB) in order to allow sustainable development within the SPB and not in the “countryside” outside of it.

Within Tiers 3,4 and 5, it is again necessary to reflect any actual developments and proposed allocations. However, beyond this the NPSG sees no justification for the extension of the SPBs within Tiers 3,4, and 5 nor the inclusion of SPBs around rural settlements that have previously not had SPBs. This will only encourage backland development which is out of character with the settlement.

Furthermore, the NPSG is concerned that there are too many examples of where the proposed SPBs do not adhere to Principle 1 of the *Interim Settlement Policy Boundary Review Background Paper*⁹, January 2024 which states that

*“The boundary will be defined tightly around the built form of settlements and where possible will **follow defined features** such as walls, fences, hedgerows, roads, canals and woodland.”*

As this is an ‘Interim’ paper, the NPSG recommends that the details of the SPBs are agreed with the local Parish Councils before they are finalised and published as part of the Regulation 19 Consultation. This will ensure that there will be any future misunderstanding to exactly alignment of SPBs.

Policy S2. 4 Development outside Tiers 1, 2, 3, 4 and 5

The NPSG is very supportive of this paragraph which identifies and stipulates that outside settlement policy boundaries, the area is countryside and thus development in these locations will be restricted and only allowed under exceptional circumstances as described in Policy NBE1.

⁹ EHDC Portal: EHDC DLP Supporting Papers: Interim Settlement Policy Boundary Review Background Paper <https://www.easthants.gov.uk/sites/default/files/2024-01/Interim%20settlement%20policy%20boundary%20review.pdf>

A minor comment on wording, the NPSG would suggest an amendment to the current wording of the Policy from “outside the settlements” to “**outside settlement policy boundaries**” in order to avoid any boundary misinterpretations.

APPENDIX 3A INSPECTORS APPEAL DECISIONS

Below is a selection of HM Planning Inspectors, comments on Medstead and Four Marks/ 'South Medstead Planning Appeals:

Report to East Hampshire District Council on the East Hampshire District Local Plan: Housing and Employment Allocations

Jonathan Bore MRTPI, 15th February 2016, he notes with regard to Four Marks/ South Medstead:

"Four Marks and South Medstead

The JCS requires allocations for a minimum of 175 dwellings. Site FM1, Lymington Farm is allocated for about 107 dwellings, FM2, land at Friars Oak Farm, Boyneswood Road, is allocated for about 79 dwellings, and site FM3, Land north of Boyneswood Road, Medstead, is allocated for about 51 dwellings. All three sites have planning permission.

There are additional housing commitments in Four Marks and South Medstead amounting to some 79 dwellings that are not allocated in the plan. The overall JCS requirement is significantly exceeded and although additional sites have been forward in representations there is no need to allocate further sites. Indeed, any significant further increase could begin to conflict with the JCS in terms of the scale and distribution of development between the settlements.

A neighbourhood plan has been prepared for Four Marks/South Medstead, but it does not include housing allocations given that three allocated sites and other committed sites already exceed the JCS requirement."

Appeal Ref: APP/M1710/W/16/3154870

The Haven, Dinas and Merrow Down, Land west of Boyneswood Road, Medstead, Alton, Hampshire GU34 5DY

11...., the recently made MFMNP provides an up to date settlement boundary taking account of current circumstances.

13. Four Marks/Medstead is identified as a small local service centre in the sustainable hierarchy of settlements identified by policy CP2 of the JCS. The population of the settlement is already large for its designation and whilst there are local services available as identified by the appellant, the overall level of services is fairly limited. The development plan strategy seeks to provide for sustainable development, seeking to ensure that land is brought forward for development to meet housing need in a sustainable manner so that it is supported by the necessary infrastructure and provides for protection of the countryside. Given that there are already permissions in place to take new housing well beyond the identified figure, the resulting implications for local infrastructure weighs against the sustainability credentials of the proposal.

Appeal Ref: APP/M1710/W/15/3134150

Land to the North of The Telephone Exchange, Lyminster Bottom Road, Medstead, Hampshire GU34 5EP

23. Four Marks/Medstead has an identified allocation of a minimum of 175 new dwellings; the Council have provided evidence to confirm that there are permissions which bring the housing provision in the area to well in excess of this figure, in the region of 316. On this basis neither the Allocations Plan nor the Neighbourhood Plan are proposing allocating additional sites or extending the settlement policy boundary to provide additional sites.

24. The additional 175 dwellings to be provided across the plan period was the subject of a sustainability appraisal. The fact that this target has been met and substantially exceeded early in the plan period demonstrates the pressure that the settlement is under, and which is likely to continue. The small level of services that are within the village are under significant pressure given the size of the settlement and the pace of increase at this point in time. This adds to the pressure on services and facilities including in terms of public open space, community facilities and education. The Council have identified the policies, CP16 and CP18 in the JCS and supplementary guidance that sets out the requirements.

Appeal Ref: APP/M1710/W/19/3225766

Land at Friars Oak Farm, Boyneswood Road, Medstead

28. Given the recent rate of housing delivery in Four Marks/South Medstead, I consider it unsurprising that MPC, FMPC and residents are concerned about the amount of new housing that has been built and any implications that has for the role and functioning of this area. Those concerns being voiced most particularly in terms of Four Marks/South Medstead becoming a dormitory housing area, with mitigating infrastructure not keeping pace with the rate of new housing delivery. I consider the provision of further housing alone, on what would in effect be an unplanned basis, would not be conducive to the reinforcement of Four Marks/South Medstead's role and function as a small local service centre providing a limited range of services.

30. Against the backdrop of rapid housing growth in the area, from everything I have heard and read, I consider that the appeal development does not find any particular support under Policy CP10, given the minimum identified housing requirement of 175 dwellings for Four Marks/South Medstead has already been greatly exceeded. That minimum requirement I consider to be commensurate with a settlement area, categorised by EHDC as being a small local service centre suitable for some new development when the JCS was adopted. The appellant has not sought to justify the development on the basis of there being a specific local need and in cross examination Mr Stallan, the appellant's planning witness, accepted that the vitality of the area would not be undermined if this development did not proceed. I consider the absence of a need to maintain the area's vitality is unsurprising, given the quantum of house building that has recently arisen in this area.

92. I have also found above that the provision of further housing alone would not be conducive to reinforcing Four Marks/South Medstead's role and function as a small local service centre, given the backdrop of the scale of the house building that has

recently taken place in the area. I consider that also weighs against the social benefits arising from this development.

Appeal Ref: APP/M1710/W/17/3168191

Land to the rear of 131 Winchester Road, Four Marks, Alton, GU34 5HY

8. Following on from this the East Hampshire District Local Plan: Housing and Employment Allocations was adopted in April 2016 (HEA). This makes provision for 316 dwellings at Four Marks/South Medstead which amounts to an 80% over delivery against the minimum allocation of 175 dwellings set out in Policy CP10 above. The appeal site is not included in these allocations. Most recently, the Medstead and Four Marks Neighbourhood Plan (NP) was 'made' by the Council on 12 May 2016 and Policy 1 reinforces the designation of the Four Marks settlement policy boundary, as set out in the JCS, and reconfirms that only proposals on land within these boundaries will be supported.

12. Furthermore, the above policies are consistent with the Framework which encourages the effective use of land and the active management of growth to make the fullest possible use of public transport, walking and cycling. I am also conscious of the relevant parts of the Framework which set out that planning should be genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area. Plans should be kept up-to-date and provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency. The Council have clearly demonstrated that this approach underpins their plan-making and decision-taking.

Appeal Ref: APP/M1710/W/16/3151088

68-70 Lymington Bottom Road, Four Marks, Alton GU34 5EP

19. I appreciate that the Framework, with its emphasis on promoting sustainable development, post-dates the 2008 decision. However, I have found the scheme would not protect the natural and built environment. I am also aware that in a recent appeal decision (the 2016 decision) an Inspector concluded that land on Lymington Bottom Road a little to the north of this current site at the Telephone Exchange² (and outside the SPB) was in an unsustainable location in relation to its proximity to services, and so likely to result in a reliance on the car. To my mind, while the site before me is slightly closer to the centre of Four Marks the distance is sufficient to mean it is still reasonable to assume its residents would also rely on the car to access shops, services, schools and so on. As such it would not meet the definition of sustainable development found in the Framework. While a 2015 appeal decision found land at 20-38 Lymington Bottom Road³ (the 2015 decision) to be sustainably located, that site is significantly closer to the village centre.

APPENDIX 3B QUANTUM OF DWELLINGS

NSSG believe that EHDC has overstated the housing need for the District outside the SDNP.

In the Tables below demonstrate the logic that has been used to reach this conclusion.

The target for the minimum number of houses to be included in the EHDC Local Plan to 2040				
1. The Standard Method				
The starting position is the Standard Method calculation for the whole of the EHDC district.				
			Per annum	2021-2040
Step 1 - Setting the baseline (national household growth projections (2014-based household projections in England, table 406 unitary authorities and districts in England))			375	7,125
Step 2 - An adjustment to take account of affordability	0.541333	54%	203	3,857
Total			578	10,982
The Plan assumes that the LPA area takes 83% of this total (82.7%)			478	9,082
Policy S1 states 9,082 dwellings minimum is 464 (so added the 14 from SDNP), para 9.11				

2.1 The effect of the SDNP on area outside the SDP			
2.1.1 What percentage		MINUS	Difference
The current Plan assumes that the LPA area takes 83% of the total			
If the number was pro rata to population (i.e. ~72% for the LPA) it would be 7, 905 Buffer: Built in due to SDNP. A calculation based on land area would increase the buffer to 4,360	7,905	-62	-1.177
2.1.2 Allocation within the SDNP			
Previously, the assumption has been that the SDNP would take 114 homes pa. This Plan assumes only 100 homes pa. 14 homes over 19 years is a buffer of 266			
Buffer: no evidence base to change from ICENI report of Sep 2023. This is already included in the 478 figure above		14	266
2.2 The Affordability Ratio			

2.2.1. Fundamental flaw			
There is no evidence that the over provision of 3,857 houses meets the objective of the AR i.e. to reduce house prices. The AR leads to 3857 homes being provided to those migrating into the District			
Major buffer: it's part of the Standard Method, but is still a huge amount, but not part of the calculation.			
2.2.2 Work-place based calculation			
The AR is based on the salaries of where you work. With this level of migration (and no provision for employment in the Plan) it is likely that these homes will be filled with people who work outside the District. The AR should therefore be residency based. Residency based AR is 12.18 which uplifts the AR by 52%.			
Minor buffer: but still more than the FM/SM allocation			
Reduction for uplift for AR 52%		-11	- 214
2.2.3 The SDNP effect			
House prices are higher in the SDNP area. The AR for the LPA is 12.24% vs 12.7% for the District Uplift =51%		- 8	- 150
Minor buffer			
3. The Buffer			
On top of all the above, EHDC have added a 'buffer'			
Buffer: there is no evidence base for this. "9.21 In the context of the need for flexibility and addressing the potential unmet needs of the wider South Hampshire sub-region, the Local Plan allocates sites that could deliver more than the 2,857 new homes requirement listed above".		-34	-643
		DLP	NPSG
Actual housing need		9,082	7,164
existing planning permission granted in Mar 2023: 3,965		-3,965	-3,965
Section 3.25 completions April 2021 to March 2023: 940		-940	-940
Windfalls expected: 1,320		-1,320	-1,320
Total to be built in this plan period		2,857	939
Declared number of dwellings required declared in the Draft Local Plan		3,500	
Conclusion, EHDC are allocating sites for more than 5 times as many sites as are needed.			

Thus, the NPSG believe that the EHDC has overstated the total figure of required dwellings by 643 units.

04 RESPONDING TO THE CLIMATE EMERGENCY

The NPSG welcomes the proposal of the EHDC *Objective B: B3 B4 and B5*, but the NPSG believes that, from analysis of the Policies, Policy objective B4 cannot be met, as the majority of the District has no access to public 'sustainable transport' and the additional use of private vehicles is necessary.

The NPSG approves and support Policies:

Policy CLIM1 Tackling the Climate Emergency

The NPSG suggests that Policy CLIM1.3 is strengthened to include the recommendations within the *National Model Design Code*¹⁰ and recommended that Policy CLIM 5 should cross referenced with Policy DES4.

The NPSG has concerns regarding the benefit of 'sustainable' public transport, particularly as the *EHDC Revised Settlement Policy Background Paper*, that identifies the research that shows the furthest a resident will walk to get to their destination, before turning to private vehicle, is 800 m. i.e. 10 minutes¹¹ walk, and major improvement in the public bus route provision within the District.

From our research on sustainable transport, the NPSG notes that transport by train with the District is dependent on two lines Alton to Waterloo and Portsmouth to Waterloo, which give access to:

- NW area: Alton, Bentley, Farnham, Woking and Waterloo (Half hourly service)
- NE area: Portsmouth, Petersfield Liss Guildford and Waterloo (Around 5 trains an hour during rush hour)
- South area: Portsmouth, Winchester, Basingstoke, Petersfield Liss and Waterloo

With regard to sustainable bus, the routes are mainly along A or B roads (noting the diversions to villages and to Bentley station)

- NW Area:
 - 9 - Alton Central Alton Circular.
 - 13 – Alton, Hook, Basingstoke and Alton, Kingsley, Bordon (Whitehill and Haslemere -school service).
 - 38 - Alton, Selborne, Greatham, Liss and Petersfield.
 - 64 – Alton, Four Marks, Ropley, New Alresford and Winchester.
 - 65 - Alton, Bentley, Farnham and Guildford
 - Local Market services Tuesdays and Fridays only

¹⁰ **UK Govt National Model Design Code**

<https://www.gov.uk/government/publications/national-model-design-code>

¹¹ **20-Minute Neighbourhoods Creating Healthier, Active, Prosperous Communities - An Introduction for Council Planners in England - Town and Country Planning Association March 2021- page 18** - Data from the 2019 National Travel Survey shows that around 80% of trips of under a mile were undertaken on foot. Average number of trips by trip length and main mode: England, from 2002'. NTS0308. In Statistical Data Set: Trips, Stages, Distance and Time Spent Travelling. Department for Transport, Jul. 2013, updated Aug. 2020.

<https://www.gov.uk/government/statistical-datasets/nts03-modal-comparisons#trips-stages-distance-and-time-spent-travelling>
https://www.tcpa.org.uk/wp-content/uploads/2021/11/final_20mnguide-compressed.pdf

- 205 West Tisted Alton Connect Taxi share
 - 206 Alton , Upper and Lower Froyle, Bently & Binstead
 - 208 Alton Beech Medstead and Bentworth
- 64X - Four Marks, Ropley Winchester, Peter Symonds College (school service)
- NE Area:
 - 13 – Basingstoke, Alton, Bordon (Whitehill and Haslemere -school service).
 - 18 – Aldershot Farnham, Wrecclesham, Bordon Liphook and Haslemere
 - 23 - Bordon. Liphook and Haslemere
 - 28 - Bordon Town Service
 - 113 – Liphook, Bramshott, Passfield Whitehall, Bordon, Sleaford, Kingsley, East Woldham and Alton College (School Service) .
 - 123 – Haslemere, Hindhead, Grayshott, Oakhanger, Alton (School Service).
 - 418 - Whitehill/Bordon, Wrecclesham, Farnham, and Farnborough Sixth Form College (School Service).
 - 737 - Havant & South Downs Colleges and Bordon (School Service)
 - 250 - Liphook Village Circular
- Southern Area:
 - 8 Portsmouth (Clarence Pier - Gunwharf Key , City Centre), Cosham, Waterlooville, Cowplain, Horndean and Clanfield.
 - 37 Havant Cowplain, Horndean, Clanfield,- Petersfield.
 - 37X Cowplain, Horndean, Clanfield, Petersfield, Selbourne and Alton (School Service) .
 - 38X Cowplain, Horndean, Clanfield Selbourne and Alton (School Service) .
 - 637 Havant, Cowplain, Horndean, Clanfield, and Petersfield . (School Service)

Ignoring School services. there are

- Four daily services in the NW area (13, 38, 64 & 65)
- Three daily services in the NE Area (13, 18 and 23)
- Two daily services in the Southern area (8 & 37)

In total, 8 routes running in the District, some joining two areas.

The NPSG has concerns regarding the quantity and viability of 'sustainable transport' connectivity across the District. This is because if residents do not have '5 minute' access to the A3, A31, B2070, B2131, B3006, B3349, and the 113 service on the B3004 is a school service, Thus bus routes only use 6 major roads in the District and thus the Policies referring to 'sustainable transport' have no meaning. The NPSG believe it will be impossible for EHDC to attain their aspiration noted in Option B

'Enable people to live locally and reduce their reliance on the private car, to help reduce the impacts of transport. on the environment and improve health and wellbeing'

Policy CLIM2 Net-Zero Carbon Development: Operational Emissions

The NPSG also looks forward to understanding the implications of *The Future Homes and Buildings Standard*¹² document,

The NPSG is glad that Policy CLIM2.3 introduces a necessary monitoring process enabling the collection of real data to compare with the design, and on-site renewable energy generation should meet requirements of Policy CLIM4; whilst all other developments must demonstrate a reduction of emissions, exceeding the energy efficiency requirements of Part L.

The NPSG supports Policy CLIM 2.4 which covers similar development of existing buildings, by requiring compliance with the requirements of Policy CLIM2.3, to be met.

The NPSG agrees with Policy CLIM2.5 that EHDC will support the retrofitting to improve the energy efficiency of existing buildings.

The NPSG notes, and whole heartedly agree, with the EHDC suggestion that designs should take advantage of solar gain to assist in heating buildings, and refers to industry information as targets (London Energy Transformation Initiative (LETI) and UKGBC [UK Green Building Council], RIBA. UKGBC [UK Green Building Council], RIBA), and the NPSG recommends links are made to include them Policy CLIM2.

The NPSG also notes the EDDC may create an offsite energy saving mitigation supplementary planning document, which the NPSG awaits to see, but the NPSG will be disappointed if it ignores non required statutory measured energy.

¹² **The Future Homes and Buildings Standards:** UK Government document, currently out for consultation

Consultation description

The government is committed to improving the energy efficiency and reducing the carbon emissions of new homes and non-domestic buildings. Energy efficiency requirements for new homes and non-domestic buildings are set by Part L (Conservation of Fuel and Power) and Part 6 of the Building Regulations 2010 ("the Building Regulations"). This consultation sets out our plans for achieving the Future Homes Standard and Future Buildings Standard. It sets out technical proposals for changes to the Building Regulations, the associated Approved Document guidance and calculation methods.

The majority of this consultation has regard to new homes and non-domestic buildings. A small number of sections are also relevant to existing buildings. These are:

- Material Change of Use
- some elements of Updated Guidance and Minimum Standards
- real-world performance of homes: changes to Approved Document L, Volume 1: Dwellings and Approved Document F, Volume 1: Dwellings to improve the commissioning of fixed building services in new and existing homes.
- Part O (call for evidence)

The Department for Energy Security and Net Zero has also published a series of documents related to this consultation, as well as their own consultations on the Home Energy Model (HEM), <https://www.gov.uk/government/consultations/the-future-homes-and-buildings-standards-2023-consultation>

Policy CLIM3: Net-Zero Carbon Development: Embodied Emissions

The NPSG notes that Policy CLIM3.1 expects of developers to reduce their building material and supply carbon footprint but would like a mechanism included for their demonstration that they have done so.

The NPSG is disappointed that Policy CLIM3.2 requires this policy to be applicable to all developments of 10 or more dwellings, but are disappointed that it does not cover non-residential buildings.

The NPSG applaud the aspiration of Policy CLIM 3.3 to retain existing structures unless renovation would be outweighing benefits of new build. The NPSG urges EHDC to actively recommend suitable proposed Brownfield sites for development.

Policy CLIM4 Renewable and Low Carbon Energy

The NPSG welcomes Policy CLIM4 ensuring EHDC support. The NPSG notes that this report referred to *Building Regulation Part L* in its 2013 iteration, but the NPSG advises it was updated in 2023; and strongly recommend that this is referenced against an updated iteration to *Building Regulation L, 2023*, of the study's

- *Table 7.1: Comparing Building Regulations 2013 Part L limiting fabric parameters and Code 4 fabric improvement packages from DCLG Cost of building to the Code for Sustainable Homes: Updated cost review (2011).*
- *Table 7.2: The extra cost of building to the national technical energy performance standard over current Building Regulations Part L 2013 (DCLG, Housing Standards Review Cost Impacts 2014)*

The NPSG notes that in *Table 7.4: On-site renewable energy and low carbon technology high-level summary* highlighted in 2018 that if EHDC implemented the proposal for individual dwellings, the District would benefit from:

- Medium gain from Solar heat gain for water heating.
- High gain from roof mounted solar pv cells.
- Medium gain from battery storage.

but it must be mindful of the need not to cause the overheating of properties, especially at night, to sleeping occupants.

The NPSG asks EHDC to improve the proposals in *Net Zero Carbon East Hampshire*, but ask it to consider landscape aspects when upgraded or new electricity facilities by quoting DM Policies. The NPSG also recommends that EHDC enquires the opinion of Natural England, as a Statutory Consultee of such applications.

Policy CLIM5: Climate Resilience

The NPSG believes that this Policy is a good springboard to commence EHDC's work on Climate Change, but believe that some requirements will need to be quantified, and urge EHDC to review the DLP against the *Climate Change and Sustainable Construction Supplementary Planning Document* ¹³April 2022, and include the good work it has previously produced.

¹³ EHDC Portal: *Climate Change and Sustainable Construction Supplementary Planning Document* April 2022
<https://www.easthants.gov.uk/media/6995/download?inline>

The NPSG urges EHDC to take account of the increased frequency 'x year significant rainfall events', particularly with regard to the effect of surface water runoff from a development site reinforcing local. Although the Parishes of Four Marks and Medstead are on the Four Marks Clay Plateau, the NPSG notes that they suffer from surface water flooding from such events, although being over 180 m above sea level! The NPSG insists that this Policy and Policy NBE7: Managing Flood Risk should include amelioration of surface water runoff.

The NPSG recommends that new development must include site-specific and building-specific measures that ensure the safety, comfort, health and well-being users. The NPSG agrees that the designer should employ the included passive measures to improve the design, but recommend that 'building orientation' is included.

The NPSG agrees with measures to provide natural areas of shade, shelter and cooling within development; planting suitable for climate change; and the provision of suitable external and internal refuges by design; but would insist that suitable covered structures for community association are provided to ensure the correct quantum is met and to support NPPF paragraph 8(b).

The NPSG has concerns regarding any proposed size of the communal amenity space as area is not defined and recommend that part of it should be 'shaded', which may reduce the productivity of the plot.

Similarly, the NPSG welcomes CLIM5.4 requiring any development containing landscaping must also include some form of rainwater for irrigation.

The NPSG is disappointed that the aspirations of the EHDC *Climate Change and Sustainable Construction Supplementary Planning Document*, April 2022¹⁴, have not been included in this document, particularly as they will 'fall' on the 'making' of this Plan.

Although the NPSG is still awaiting the full details of the Future Building Standard, set to be in use in 2025, but the NPSG is disappointed not to find it cross referenced in this section as an exemplar.

Similarly, the NPSG is disappointed that for Multi-Residential and Non-Residential Development the suggested BREEAM requirements have not been referenced or the requirement to review the compliance of the built development with its design by using following schemes which seek to address the performance gap:

- BRE's *Bridging the Design and Innovation Gap (BRIDG)*
- BRE's *NABERS* which focuses on energy-use in new office development
- BEPIT's *Better Building Tool Kit*; and/or
- NEF's *Assured Performance Toolkit*

¹⁴ EHDC Website: *Climate Change and Sustainable Construction Supplementary Planning Document*. April 2022
<https://www.easthants.gov.uk/media/6995/download?inline>

The Policies do not direct designers to locate non habitable rooms and buildings to the north of dwellings, nor to take advantage of the prevailing wind and natural light.

There appear to be no Policies in the DLP to accommodate the use of grey water.

The SPD had included the requirement to design for the lifetime use of residents that should be referenced in these Policies.

The NPSG urges EHDC to review the DLP against the SPD, and include the good work it has previously produced.

05 SAFEGUARDING OUR NATURAL AND BUILT ENVIRONMENT

The NPSG applaud the fact that that EHDC are trying to protect our localities under its *Objective B Providing better quality, greener development in the right locations* and *Objective C Prioritising the health and well-being of communities in delivering what's needed to support new development*:

The NPSG approves and support Policies:

Policy NBE1: Development in the Countryside .

The NPSG supports this Policy as it links to Policy S2.3 and defines what development will be allowed in the countryside. It appears to be stronger than the existing Policy CP19.

Policy NBE2: Biodiversity, Geodiversity and Nature Conservation .

The NPSG believes that the clauses in Policy NBE2 should be made stronger and made SMART by using a quantitative measurement method, which the NPSG would prefer.

The NPSG would ask EHDC to use this Policy to rescind its proposed change to the Settlement Policy Boundary, *Four Marks, Point 16 - Land to rear of 131 Winchester Road*¹⁵, particularly as the site contains a SINC which includes the adjoining hedgerows and is known to contain a badger sett (personal encounter identifies they range south of Brislands Lane) and several species of deer.

Policy NBE3: Biodiversity Net Gain .

The NPSG would recommend that proposals must be retained for 30 years, against prescribed metrics.

The NPSG approves and support Policies:

Policy NBE4: Wealden Heaths European SPA and SAC sites

Policy NBE5: Thames Basin Heaths Special Protection Area

Policy NBE6: Solent Special Protection Areas

Policy NBE7: Managing Flood Risk

The NPSG believes clause (f) should be expanded to specifically include flooding from Surface water runoff, particularly as the NPSG is aware that the Flood Risk map only shows ground water/river flood risk and not the occurrences of surface water flooding.

The NPSG notes the EHDC the Acom Level 1 Strategic Flood Risk Assessment and refers to *Figure 10a Risk of Flooding from Surface Water Map covering the north of the District*¹⁶.

¹⁵ EHDC Draft Local Plan 2021-2040 (Regulation 18) Interim Settlement Policy Boundary Review Background Paper January 2024 Point 16 Land to the Rear of 131 Winchester Road, Page 54
<https://www.easthants.gov.uk/sites/default/files/2024-01/Revised%20settlement%20hierarchy.pdf>

¹⁶ EHDC Portal Acom Level 1 Strategic Flood Risk Assessment and refers to Figure 10a Risk of Flooding from Surface Water Map covering the north of the District
<https://www.easthants.gov.uk/media/7802/download?inline>

The NPSG has reviewed it has extracted the section covering Medstead and Four Marks Parishes, below.

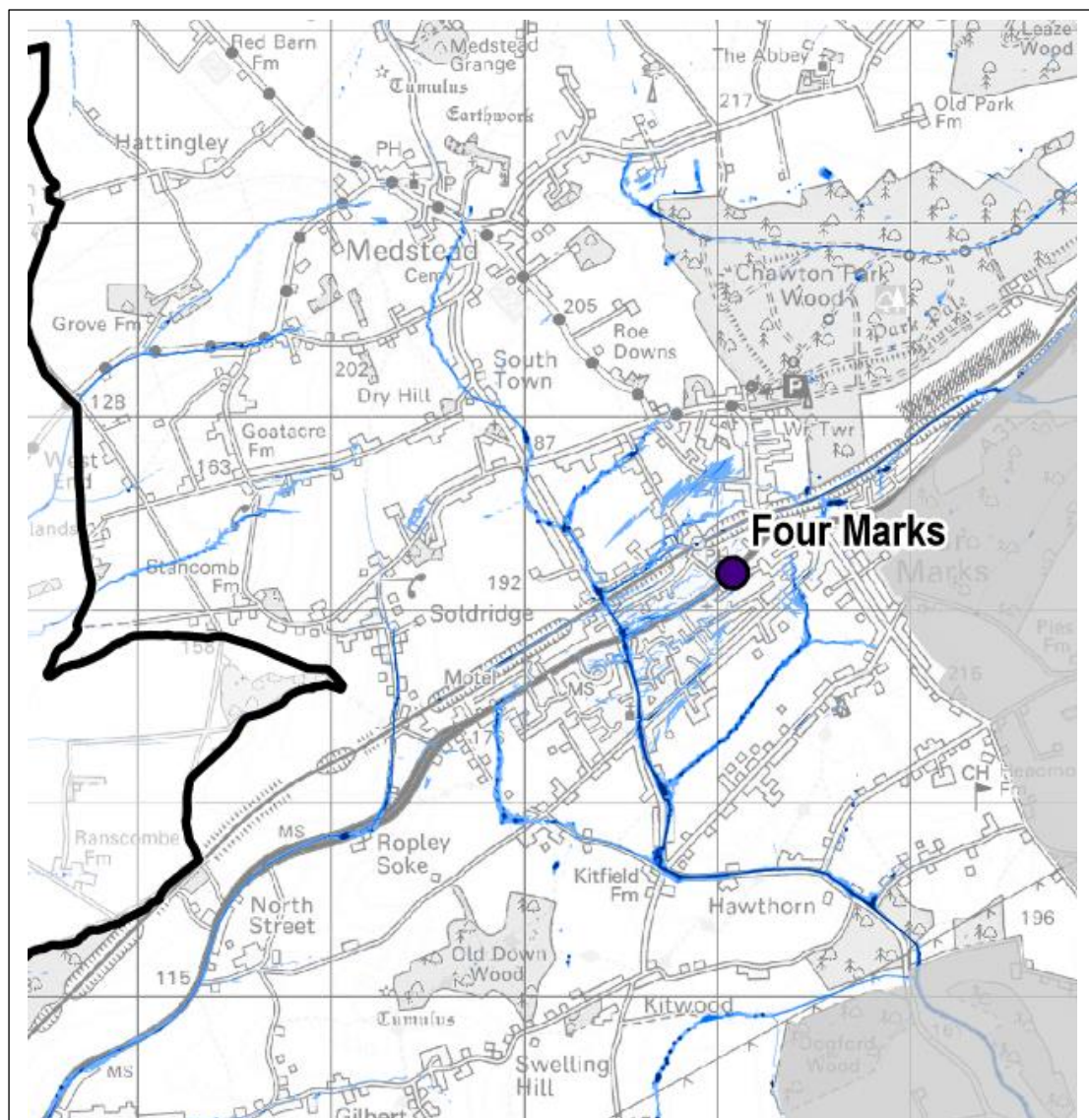


Figure 10a Risk of Flooding from Surface Water Map covering the north of the District.

The NPSG is also very aware that the depth of the primary aquifer locally is shallow in places, and that both the EA (see the EA comment to EHDC Planning Application 39009/008 | *Outline application for the construction of up to 1525sqm of Class E uses, including provision for a flexible working facility, including details of the means of vehicular access. Land to the north of the Telephone Exchange, Lymington Bottom Road, Medstead*¹⁷); and Hampshire County Council, the Lead Local Flood Authority Local Flood agency, in responding to other Applications, do not recommend the use of deep boreholes as part of a SuDS scheme.

¹⁷ EA Letter, EHDC Planning Portal 39009/008 | **Outline application for the construction of up to 1525sqm of Class E uses, including provision for a flexible working facility, including details of the means of vehicular access. All other matters (layout, scale, appearance and landscaping) to be reserved for future consideration. | Land to the north of the Telephone Exchange, Lymington Bottom Road, Medstead, Alton**
https://planningpublicaccess.easthants.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=EHANT_DCAPR_250919

The NSPG is aware that a major potable water aquifer is sited close to the surface below the parishes and ask that EHDC a require the drainage solutions to be suitable as not to pollute the water source.

Hampshire Highways are also aware of the surface water flooding at Five Ways, the road junction by Four Marks CofE Primary School. The occurrence of serious disruption, particularly at school; opening and closing times is becoming more frequent.

The consequence of this flooding is of great concern to residents.



West to Gradwell Lane



South towards Kitwood Road from Alton Lane



North towards Lymington Bottom



Additional congestion

This always leave detritus that cause additional hazards not only to children but to vehicles that may not be aware of its presence.



This flooding adds a stress on the School Crossing attendant whose sole duty is to ensure that school children cross the road safely.

The NPSG thanks A Parrett for the images.

Policy NBE8: Water Quality, Supply and Efficiency

The NPSG supports Policy NBE8 Maintaining water quality. To that end the NPSG notes that EHDC have allocated as an employment site *ALT3 – Land adjacent to Alton Sewage Treatment Works, Alton*. The NPSG is greatly concerned that the removal of expansion land from the WTW will affect the future needs of Alton and the villages to the north, south and west, whose foul water is currently processed by the site.

It is known that the Statutory Undertaker will only plan for a capital spend on system development in line with forecast planned development. This DLP appraisal does not appear take into account the needs of any speculative development planning applications that may be granted at times the LPA does not have a 5 Year Land Supply. The NPSG would ask that for those reasons this site is removed from the proposed allocations.

The NPSG is aware that a major potable water aquifer is sited close to the surface below the parishes and ask that EHDC require the drainage solutions to be suitable for SP1 SP2 and SPZ locations as not to pollute the water source.

Policy NBE9: Water Quality Impact on the Solent International Sites

The NPSG reminds EHDC the area of the impact includes two of the EHDC Allocated sites:

- *FMS 1 Land West of Lymington Barns*
- *FMS 4 Land South of Winchester Road*

As they are on the Wey/ Itchen watershed, they will drain some of the site into the Itchen basin,

Policy NBE10: Landscape

The NPSG notes that Four Marks is the most northerly of the Hampshire 'Hangers, and its western edge of the Four Marks/ 'South Medstead' Settlement adjacent to the A31 has extensive views to the west including Cheesefoot Head, and similarly the view from those sites to Four Marks.

When consulted by EHDC on its *10 Large Site Consultation*, CPRE noted that the escarpment between Ropley and Four Marks was a 'valued landscape' and should be protected.

At the top of this escarpment is Barn Lane Four Marks and the proposed *FMS4 Land South of Winchester Road*. *If this development is approved, the NPSG seeks that Policy NBE 10 is rigorously applied to the development.*

Policy NBE11: Gaps Between Settlements

The NPSG commends the expansion of the Medstead & Four Marks Neighbourhood Plan Local Gap from one field to cover the area from South Town Road to Chawton Park Woods, and Five Ash Road to Medstead Bowl Club and Foul Lane - preventing the joining of the Settlements. The NPSG recommends the wording is expanded to include any gaps defined in Neighbourhood Development Plans.

Policy NBE12: Green and Blue Infrastructure .

The NPSG suggests that Policy NBE 12 mentioned in Policies CLIM 5 DES 1, DES2 DES 3 and DES4.

The NPSG notes that Fig 5.4 (*DLP Reg 18-2 Consultation, Chapter 5, page 145*) is an amalgamation of all the recommendations made in the East Hampshire Green Infrastructure Strategy, 2019; and in *Section 5 Strategic Projects*, under *Site-Specific Projects*, Project 3 refers to 'Provide a new strategic semi-natural greenspace in the northwest of the District', which will be found in Appendix 5 A. The NPSG looks forward to EHDC bringing this project to fruition.

Policy NBE13: Protection of Natural Resources

The NPSG acknowledges and agree the need to protect all natural resources as defined in the Policy and by the implementation of Policy NBE 13(f) aquifers will be protected.

The NPSG asks that this clause to be particularly used in conjunction with the adjudicating of Planning Applications when deliberating on SuDS drainage schemes, to be especially considered when the use of boreholes is considered in SPZ SP1 or SP2 areas where aquifers, either primary or secondary, close to the site. The NPSG would also recommend the protection of dark skies in rural areas is included in this policy.

Policy NBE14: Historic Environment

The NPSG is aware of Ancient Monuments in the proximity of Medstead village (2 Tumuli and a significant earth work, which are **not** shown on the EHDC map). Hampshire County Council Archaeology Service are very cognisant of the history of the Medstead and Four Marks area, a Roman Road, a Saxon Church the track of the Pilgrims Way route from Winchester to Canterbury, a Toll Road. The NPSG is aware of detectorists sweeping the local field finding objects from roman times to the present day. The NPSG believe that this policy is needed to protect our heritage.

APPENDIX 5A SECTION ; EAST HAMPSHIRE GREEN INFRASTRUCTURE STRATEGY 5 STRATEGIC PROJECTS

Site-Specific Projects,

Project 3 Provide a new strategic semi-natural greenspace in the northwest of the District

The NPSG look forward to the implementation of this Scheme as it will protect the NW of the District from 'development creep'.

The NPSG asks that EHDC include all the proposed options in the Draft Local Plan, Regulation 19 as its aspiration for future implementation.

3¹⁸ Provide a new strategic semi-natural greenspace in the northwest of the District	
Overview	Provide a new semi-natural green space (sub-regional level (60-400 hectares) in the northwest of the Borough (Alton/ Four Marks/ South Medstead) to address deficiency of natural & semi-natural open space.
Approximate location	
Potential Interventions	<ul style="list-style-type: none"> • Identify sites for a new semi-natural green space in the north-west sub-region. • Locate open space in proximity to Alton or Four Marks to capitalise on development • Establish links to open space through proposed development. • Encompass existing blocks of woodland within the park area to offer a diverse recreational experience. • Implement biodiversity enhancements and establish management plan to ensure long-term ecological value. • Implement woodland to screen development where appropriate. • Connect with existing strategic public rights of way.

¹⁸ EHDC portal; East Hampshire Green Infrastructure Strategy, 2019. 5. Strategic projects, Site-specific Projects 3 3. Provide a new strategic semi-natural greenspace in the northwest of the District, page 59 <https://www.easthants.gov.uk/media/8743/download?inline>

	<ul style="list-style-type: none"> Adopt a community led design process in the development of the open space and adopt volunteers through construction. 	
Contribution to GI themes	Landscape, Heritage and Sense of Place	■
	Biodiversity	■
	Woodlands	■
	Water Environment	
	Access, Recreation and Transport	■
	Health, wellbeing and Inequality	■
	Local awareness and involvement	
	<p>A sensitively designed open space would help to enhance overall landscape character and address sensitivity from forthcoming development in the northwest of the District. Appropriate planting and management would help to enhance biodiversity value of the area such as through management enhancements at Woodland SINCs in this area. The open space would provide an important recreational resource promoting access to the countryside, which in turn will promote physical activity and access to nature. This would address open space deficiency in the north-west sub-region and help to improve health and wellbeing for residents in this area, which is particularly important for Alton given its higher levels of development and social deprivation relative to the rest of the District.</p> <p>Engaging in community led design and construction will help to foster a sense of ownership and promote social cohesion.</p>	
Potential partners / stakeholders	East Hampshire District Council Local Parish Councils Forestry Commission	Private landowners Prospective developers
Delivery mechanisms	Embed proposal within Local Plan Biodiversity offsetting Delivery body/partnership to oversee project delivery	
Potential funding streams	S106 CIL Lottery funding - National Lottery Grants for Heritage Recreation and Heritage Community Fund 2019 to 2020 Hampshire County Council	MORE woods and MORE hedges - Woodland Trust Tax initiatives Community Infrastructure Levy
Delivery priority	Long term	
Potential challenges	No lead stakeholder currently in place Availability of land/ land ownership Establishing long term funding for stewardship Balancing recreation with landscape and biodiversity sensitivities of the project area	

06 CREATING DESIRABLE PLACES

The NPSG acknowledges that these policies link to *NPPF paragraph 134* links to the *National Model Design Code*¹⁹(NMDC), and directs LPAs to use it when adjudicating Planning Applications in Authorities that do not have their own Design Code. It provides detailed guidance on the production of design codes, guides and policies to promote successful design with the reduction of CO₂ generation and improving local climate resilience, and acknowledge that EHDC Objectives B1 and B3 apply. The NPSG is disappointed that there no clarity given in the DLP about the production of a Design Code for the District in terms of either content or timing. The NPSG, together with the Parish Councils request a meeting with Officers to assist in the production of a Code covering the particular needs our local area which will protect the 'sense of place' of the Parishes.,

The NPSG approves and support Policies:

Policy DES1 Well-Designed Places

Although disappointed that this document does not contain a Design Code, the NPSG supports its production and ask that it will support CO₂ reduction, and believe that it should improve on the NMDC as a minimum standard. And recommend that it should cross reference to Policy CLIM5.2a.

The NPSG notes the statement within the Settlement Hierarchy Background Document and have reservations regarding the distance of the proposed walking routes, especially should the route to the destination is greater than 400m, and note that, under the NMDC, **Check List Movement**, on page 18, refers Local Design Codes to consider, under **M.1 Connected Places** at bullet point 2 :

'The provision of public transport and the distance of all dwellings from a stop.',

The NPSG agrees that Tier 1 & 2 Settlement the walking distance should also comply.

The NPSG would recommend a modification to the Policy to ensure that the applicant includes a suitable roofed structure for informal social get togethers to improve social cohesion that gives protection from inclement weather and excessive sunshine, to support NPPF Paragraph 8(b).

The NPSG supports the use of appropriate high quality and durable materials

The NPSG agrees with EHDC regarding the inclusion of the proposed planning headings, but believe that they should be published as part Policy DES1.2, rather than elsewhere.

The NPSG strongly agree with requiring developments that could have an impact on the area must have a detailed Planning Statement or Design and Access Statement, to identify any mitigation.

Policy DES2 Responding to local character

When preparing its 'Design Document', the NPSG believes that EHDC must engage with Parish Councils and Neighbourhood Development Plan groups regarding to:

¹⁹ UK Govt National Model Design Code

<https://www.gov.uk/government/publications/national-model-design-code>

- site context
- public transport
- road hierarchy including the reduction of single access estates.
- open space
- drainage
- biodiversity issues
- housing density, including plot ratio and coverage, building type and form, building line and height,
- sense of place and master planning and building identity
- public space
- site use, housing mix and type, community facilities and local services
- housing type, space standard, and accessibility for whole life occupation, lighting, aspect and privacy
- energy resources including the orientation of roofs to improve renewable energy collection.

The NPSG believes that this Policy should include renewable energy generation by referencing Policy CLIM5. The examples shown in Figs 6.5, 6.6 & 6.7 do not appear to be defined or referenced in the Policy.

Policy DES3 Residential Density and Local Character

The NPSG can understand why EHDC has recognised the need to increase the required density of dwellings on new housing developments, to satisfy the need for houses in the District outside the SDNP, but the NPSG believes that existing historical housing neighbourhood densities should not be overwhelmed by a rush for densely packed estates to provide additional dwellings, although much needed in some areas of the District.

The NPSG believes that the local character of an area must be retained and maintained. Any policy regarding the design of a new dwelling or development must ensure that the process is carried out sensitively and faithfully remain consistent with the character of surrounding local area,

The NPSG notes that it is the intention of Policy DES3.1 to manage the design of dwellings and estates both within SPBs and any allocated sites. The NPSG notes the requirement that developers, should make the best use of space, but the designer must ensure that they have considered the site, its topography and its surroundings; and when creating the master plan, they must ensure, whilst making good use of the space, the design is compatible with and sits well within its surroundings, meeting the criteria of DES1 and DES2

The NPSG notes that the Housing Density on a new site is proposed to be within the range of existing residential densities local the development site and ask who would be responsible for determining this information and suggest that it is the responsibility of the LPA to ensure consistency. The NPSG agrees that the layout should be similar to those adjoining neighbourhood, or building position and compliance, height-to-width ratios for streets, back-to-back distances for buildings, plot coverage and heights and massing are in line with the predominant feature of surrounding existing developments.

The NPSG agrees that housing density must meet the criteria to allow streets to be wide enough to provide green infrastructure in line with CLIM5 and by inference *Model Design Code Guidance* N1 and P2, together with complying with any Parish or NDP design codes regarding any block or plot design, plot coverage and building layout

The supporting documentation notes the need for Design Codes and this Policy assists in maintaining the local feel of an area.

Policy DES4 Design Codes

The NPSG notes that the LEA is working to create a Design Code under a separate consultation and believe that it should

- to cover the whole DLP area,
- to be consistent with local neighbourhood characteristics,
- to be prepared after consultation with the Parish and Town Councils and NDP groups.

The NPSG notes that it is EDHC who determine the visual and numerical requirements of any design code for any development within EHDC but outside the SDNP but are confused as to how this data is derived.

The NPSG notes the binding requirement of Design Codes within the LPA area will be limited to:

- Built form;
- Movement;
- Homes & buildings;
- Resources; and
- Lifespan.

The NPSG believes that EHDC are short sighted and mistaken in not considering other areas in their Design Code:

- Context
- Nature
- Identity
- Public Space
- Use

This omission will prevent Town and Parish Councils or NPD controlling the design of changes to their area, especially those that have been provided through speculative development.

We note that from Legislation that a Local Plan must contain a design code. The NPSG expect to be able to advise and comment on the Code on it before it is put to consultation before adoption and inclusion in the EHDC *Reg 19 Draft Local Plan Consultation*.

The NPSG notes it considers other information that may be included in a Design Code that could hold significant weight, provided they are evidenced, but the NPSG believes that both EHDC and Town and Parish Councils will not be able to legally resist non-compliant designs against the Code unless all hold equal weight.

The NPSG submits its first thoughts for Design Codes in Appendix 6A.

APPENDIX 6A CREATING DESIRABLE PLACES - DESIGN CODE

Suggested Design codes for rural Areas

Consideration of the Proposal against the National Design Code Guidance.

Introduction

The National Model Design Code Part 2 Guidance Notes was amended in 2021. When making decisions the LPA is directed to use this Guidance under the NPPF, 2023, if there is no local design code in place:

“134. Design guides and codes can be prepared at an area-wide, neighbourhood or site-specific scale, and to carry weight in decision-making should be produced either as part of a plan or as supplementary planning documents. Landowners and developers may contribute to these exercises, but may also choose to prepare design codes in support of a planning application for sites they wish to develop.

*Whoever prepares them, all guides and codes should be based on effective community engagement and reflect local aspirations for the development of their area, taking into account the guidance contained in the National Design Guide and the National Model Design Code. **These national documents should be used to guide decisions on applications in the absence of locally produced design guides or design codes.**”*

The NPSG has some initial thoughts on a Design Code that it would like to explore with EHDC as it prepares a design Code for the District, outside the National Park.

Key Issues to be considered:

Context

- The context of the site in relation to its surroundings must be reviewed. The NPSG believe that the Hampshire Alp context must be retained, giving a rural feel to all new developments.

Movement

Connected Places

- It must connect to the key points in the settlement. THE NPSG has concerns that the walking distances of some developments will be too great, and encourage private vehicle use contrary to Policy CLM1 and Policy CLIM2
- In rural areas there will be no streetlighting, thus footpaths and road are not illuminated. The NPSG asks that the illumination on residential sites is restricted by defining the maximum power of the Luminaire in lumens and the envelope of its illuminated area'. This should not be out of keeping with its Dark Skies Policy DM12.
- Any L.E.P. and L.E.A.P. should be close by and should be enclosed to prevent fouling by dogs. It should also have a covered area, with seating, to give shelter from the sun and inclement weather, to allow members of the local community to meet socially.
- No public transport provided in most parts of the District and the distance of dwellings furthest from the site entrance is estimated to be over a kilometre from a bus stop.

Active Travel

- With regard to active travel, it must take into account any PRow network, bus stops, cycle routes. Any new development should allow for linking to other adjacent developments and must not restrict them by including ransom strips that would prevent these connections.

Parking and Servicing

- A development should have the majority of off street parking for visitors and cycle storage. The NPSG would prefer that any additional off street parking required to fulfil the EHDC Parking requirement was not positioned in front of the garage, and would ask that such spaces were not in a 'tandem' format. Cycle storage should be in a secure area, either in an enlarged garage, suitable storage shed, or suitably covered and lockable communal storage facility.
- Refuse Bin storage must be considered, and must be suitably sized to accommodate the forthcoming updated in Waste recycling regulations.

Nature

Green Infrastructure

- Green infrastructure together with current and future planting should be considered. The NPSG would ask that developers try to link with neighbouring infrastructure to enhance local wildlife corridors.

Water and Drainage

- The Flood Risk assessment should be made and also consider surface water runoff. Care should be taken with deep boreholes, particularly in areas with potable aquifers.

Biodiversity

- The Government's Biodiversity Net Gain Policy, and the Local Nature Recovery Strategies must be implemented.

Built Form

Compact Development

- Reflect approximate net residential densities of the adjacent areas. The NPSG would ask that any development replicates the density of any adjacent development.
- Plot coverage should be similar to adjacent areas. Similarly, the NPSG would ask that any development replicates the Plot coverage of any adjacent development.
- The way adjacent buildings join should be considered, although the majority of the Parishes dwellings are detached or semidetached with a few terraced and multi dwelling buildings.
- The Tenure mix should be considered.

Affordable Homes

- Must be considered. The NPSG believe that Affordable homes should be distributed throughout any development.

Built Form

- The separation of public and private space and the use of blocks, including cul-de-sacs and gated communities must be considered,
 - gated communities. The NPSG notes that there are no local gated communities.
 - Roads; Any road should have trees to give shade and support local ecosystems
 - infill sites. The NPSG is wary of backland development, and it should not create cul-de-sac developments.
 - tall buildings. NPSG believes that tall buildings over 3 story should be avoided in the area.
 - the building heights.
 - building lines. The NPSG believes that any Building lines should be in keeping with that of the local area of the development
 - The design and types of blocks. The NPSG believes that the design and types of blocks should be in keeping with the local area.
 - The palette proposals for the new development. The NPSG believes that the design palette should be in keeping with the local area.

Identity

A Sense of Place

- consideration of location. The NPSG believes that any development should have a 'rural' feel, and be similar to the adjacent developments,
- mix of architectural styles. The NPSG is supportive of architectural styles, but they should be in keeping with the local area, unless of outstanding design.
- building positioning on the plot. The NPSG believes that existing local features be maintained and suggest that new dwellings are not positioned on the front of the plot , but sufficiently distanced to provide some 'environmentally friendly' natural space to the front of the dwelling.
- roads. The NPSG believes that to protect our 'Dark Skies' streetlighting will not be included, but believes that trees should be provided both to give shade and increase the biodiversity of the development .
- footpaths. The NPSG believes that foot paths on a new development should be of footway standard, with a surface that is water permeable, yet sufficiently robust to allow pedestrian use during inclement weather, and not to cause users to become muddy.
- a Master Plan. The NPSG believe any master plan for a new development of more than 10 dwellings must have more than one access point for vehicles.

- the distance of the development from local infrastructure and services. The NSPG believe that to reduce the use of motor vehicles, ideally, all dwellings on the development should be within 800m of the key infrastructure facilities of the settlements, as identified by EHDC in Policy DEC4.

The Identity of Building

- Types, shapes and heights of building in keeping with locality. The NSPG believes that the type, shape and height of any building should be in keeping with its immediate locality, but this does not preclude the development of a building of an outstanding design in the locality.

Public Space

Streets

- Similar to locality. The NSPG believe that the streets on a new development should be similar to those in the locality. Mixed use streets could be considered but each should have at least one footway.
- The NSPG believe that any cul-de-sac should contain only 5 dwellings, and development of more than 5 dwellings should have 2 points of vehicular access.
- 'green' streets. The NSPG believe that the streets should be tree lined to improve the ecological diversity of the area.

Social Interaction

- The NSPG believe that any development of over 10 dwellings should provide some form of public meeting space, on larger sites this should be a structure, covered for shade and weather proofing.

Security and Public Space

- The NSPG is aware that there is no street lighting on new developments, due to the 'Dark Skies' initiative. The NSPG would like to discuss with EHDC a specification to reduce light pollution by defining the maximum lumen power of any external luminaire and the envelope of its illuminance. This should not be out of keeping with its Dark Skies Policy DM12.
- The NSPG would like to discuss with EHDC its view on the definition of public and private space.
- The NSPG note that, in this area of the District, the terrorist threat is possible, but consider an event improbable in our villages.

Use

Variety and Activity

- The NSPG note that most developments would be expected to be residential, but would welcome EHDC's advise to develop a Code for retail leisure and industrial settings.
- Active frontages. Similarly, the NSPG would like to discuss the treatments of Active Frontages with EHDC.

Housing Mix

- When appropriate, the NPSG welcomes to opportunity for a mixed and integrated pattern of housing tenures on a development, enabling it to be 'tenure-blind' development; and would welcome a discussion with EHDC on how this can be set out in the Code.
- Mix of house types. The NPSG would suggest that the type of dwelling is in keeping with the housing types in the local area, but detached, semidetached link detached and terraced house would be acceptable as would bungalows two story and three story town houses and to story multi occupational dwellings.

Community

- Education The NPSG are aware on the restrictions on increasing the entry of local schools other than Four Marks that has Planning Permission to increases the Roll to 2FE.
- Green space The NPSG welcomes green and ecofriendly space on a development and would seek EHDC's advice on how this could be included in a Design Code.
- Accessibility to local services. The NPSG is becoming increasingly concerned on the access to local services by pedestrians from new developments, particularly if they are near the edges of the SPB, or for speculative developments outside it, and seeks EHDC's advice on creating a meaningful code.

Homes and Buildings

Housing Quality

- The NPSG believes that new dwellings should meet or better the Nationally Described Space Standards .
- The NPSG believes that new dwellings should meet the requirements of Building Regulations M4(2), accessible and adaptable standard
- The NPSG believes that new dwellings should meet M4(3), wheelchair user dwelling standard.

Health and wellbeing

- Privacy. The NPSG believes that new dwellings should maintain privacy and would like to discuss with EHDC ideas on how this can be protected.t
- Internal daylight and sunlight – The NPSG believes that new dwellings should take maximum advantage of daylight and sun light by their position/ orientation on the plot.
- Aspect homes on corner plots. The NPSG believes that new dwellings on corner plots should be dual aspect and take maximum advantage of daylight and sun light by their position/ orientation on the plot.
- Security by design. The NPSG believes that the dwelling should be secure by design.
- Open space. Green infrastructure together with current and future planting should be considered. The NPSG would ask that developers try to link with neighbouring infrastructure to enhance local wildlife corridors. The

NPSG believes that each large development should have some green space for the activity of residents.

- L.E.P. and L.E.A.P. Play areas. Any L.E.P. and L.E.A.P. should be close by and should be enclosed to prevent fouling by dogs. It should also have a covered area, with seating, to give shelter from the sun and inclement weather, to allow members of the local community to meet socially.

Resources

Energy

- Layout. The NPSG believes that the developer should use the principles of Passive design and orientation to reduce the need to expend energy for heating and lighting, but should allow for the efficient installation of pv cells, and solar water heating.
- Renewable energy strategy. The NPSG believes that the developer of a site of over 10 dwellings must have renewable energy strategy.
- Local low energy networks. The NPSG believes that, unless a large site, the developer would not be able to design in a low energy network

Sustainable Construction

- Embodied Energy targets. The NPSG would encourage the developer to embody energy targets and report back on its success, seeking amelioration if the target was not met.
- Whole life carbon targets. The NPSG would encourage the developer to embody whole life carbon targets in its design
- The NPSG would encourage the developer to compliance with BREEAM or other best practice targets, as appropriate.
- The NPSG would encourage the developer to show how water saving measures can be achieved and report on the outcome, seeking amelioration if the target was not met.

Lifespan

Stewardship

The NPSG would seek guidance from EHDC on how measures could be implemented to cover

- A stewardship plan and when it will be required;
- Guidance on adoption of public areas;
- Guidance on facilitating community management.

Before the publication of the DLP Reg 19 Consultation, the Parish Councils and NPSG would like to engage with EHDC to discuss a mutually acceptable Design Code for the settlements and countryside areas of the Parishes. This will help with the planned revision of the *Medstead & Four Marks Neighbourhood Development Plan* that needs to be put in place to comply with the EHDC Local Plan is 'made'.

07 ENABLING COMMUNITIES TO LIVE WELL

The NPSG welcomes the acknowledgement by EHDC that the planning process can improve its residents' 'Well-being' by approving planning applications that create sustainable developments. There are many ways a development can improve well-being of residents.

The NPSG approves and support Policies:

Policy HWC1 Health and wellbeing of communities

The NPSG believes that this Policy is a forward looking policy, joining with the Hampshire Integrated Care System (HICS) to use the planning system to provide facilities for a Healthy lifestyle within new developments, by designing them to facilitate the easy movement of all residents, and supporting the needs of all.

The NPSG supports the aspiration within the Policy for:

- the provision of active designs which support wellbeing and greater physical movement
- access to sustainable modes of transport to reduce car dependency, **(Note:** EHDC should recognise that the comment in their *Settlement Hierarchy Background paper*, that the sustainable transport must be accessible within 400m.)
- access to safe and accessible green infrastructure, open spaces and leisure, recreation and play facilities to encourage physical activity; as it improves and maintains the mental health residents, the provision of which should be mandatory to be in compliance with NPPF Paragraph 8 (b).
- access to local community facilities, services and shops, which encourage opportunities for social interaction and active living, but the NPSG has great concerns how this can be created sustainably in line with NPPF paragraph 8 (a) and (b), especially if the facilities are greater than 800m distant²⁰, supported by the NMDC²¹, (*Check List Movement, M.1 Connected Places* at bullet point 2)over would cause ambulant residents to use private transport.

The NPSG welcomes the inclusion Health Impact Assessments (HIA) for larger sites, it will ensure that it will assist in the assessment of any application and identify any negative impact to the HIA within the proposal.

²⁰ EHDC **Draft local Plan 2021-2040 Settlement Hierarchy Background Paper** stated that residents will consider private transport over walking if the destination is greater than '10 minute' (400m) distant.

²¹ **UK Govt National Model Design Code**

<https://www.gov.uk/government/publications/national-model-design-code>

08 DELIVERING GREEN CONNECTIONS

This suite of Policies are designed to protect the Community Facilities within the District.

The NPSG supports the ambition expressed in the *Delivering Green Connections* although this title appears to be a misnomer as the chapter appears to deal with infrastructure, rather than environment and believe that any planned **must** be supported by **sufficient** infrastructure, including, social, transport, and utility infrastructure, although it is a statutory requirement of electricity, gas, foul water and potable water undertakers to provide the level of service to new developments.

These include those controlled by the LPA:

- sports and leisure facilities, including swimming pools, sports halls and outdoor sports spaces;
- community and cultural spaces, meeting rooms and halls;
- burial grounds and crematoria.

The NPSG is also aware that the provision of some infrastructure is not the direct responsibility of the LPA:

Hampshire County Council:

- educational facilities, including early years education, primary education, secondary education, further education, adult learning and special educational needs
- fire stations, policing and other criminal justice or community safety facilities;
- libraries;
- Transport footpaths, cycleways, bus lanes, and local roads

Hampshire Integrated Care Board:

- Health services including acute, primary and secondary health,

Network Rail:

- Railways

Telecommunications:

- Utility providers

The NPSG commends the aspiration to reduce the reliance on the need to travel by the private car and making travel options that benefit our environment but do not believe this will be met, as without a sustainable transport system in the District, either inside or outside the South Downs National Park, to access another sustainable location.

IDENTIFYING INFRASTRUCTURE REQUIREMENTS

Infrastructure Plan

The NPSG supports Objective C: Prioritising the health and well-being of communities in delivering what is needed to support new development, especially its aspirations for:

- timely provision of agreed services and infrastructure to support strong communities,
- infrastructure to keep pace with technology and improve and adapt to meet current and future needs.
- maintaining and enhancing the current built and natural environments to support habitats and their connectivity, allowing the public to open spaces and green infrastructure, and
- sport and recreation opportunities to be available in the right location to meet current and future needs.

The NPSG believes that the need, as currently indicated by the LPA, may be understated due to the understatement of those 65+, and therefore, when planning infrastructure, must prioritise the health and well-being of communities.

The NPSG approves and support Policies:

Policy DGC1: Infrastructure

The NPSG supports the Policy, not only the need to fulfil the requirements for the locality and not just the site alone; but also, the requirement for infrastructure to be provided at time of need, using secured funding determined at the time of adjudication of the application, and 'policed' by using Grampian conditions if required.

The LPA needs to review and confirm the aspirations of our communities within the District. The required infrastructure needed must be defined through a dialogue between the LPA and Parish Council identifying the requirement to be added for each Planning Application.

The NPSG supports the proposal that a planning consideration that insufficient infrastructure is a reason to refuse a Planning Application.

Policy DGC2 Sustainable transport

The NPSG is delighted to see the emergence of this Policy and note that information to assist its adjudication is found in the *Revised Settlement Hierarchy Background Paper, 2024*. The NPSG believes, for ease of understanding of the policy, the number of dwellings triggering the Policy should be reduced from eleven to 'ten' to fall in line with other Policy housing levels. It is noted that the detailed research behind the *Settlement Hierarchy* paper notes that, generally, residents consider a walk of 10 minutes acceptable, and over which a vehicle would probably be used., especially where there is no sustainable public transport.

The NPSG welcomes that the LPA is identifying the conditions against which the compliance of applications will be compared and agree that linkages to existing or new public transport services must be in place, but note that outside Tier 1 and 2 settlements, these services are almost non-existent. The NPSG reminds EHDC that its

Settlement Hierarchy paper determines that access to such transport should be within 400m of the furthest dwelling from the site access.

It is also noted that this Policy will consider the Local Cycling and Walking Infrastructure Plan, (*currently found in the partner paper -13 Supporting Documents, 13.7*), which recommends for Four Marks/ 'South Medstead' 'a village wide 20 mph area', which, if formally proposed for adoption, would immediately raise objections from Highways England regarding the A31.

The NPSG notes the aspiration to create 'attractive and well-designed walking and cycling networks with relevant supporting infrastructure', but have a concern regarding the 'perceived safety and security of these modes' particularly for those developments in a rural setting close to the SDNP where villages have a dark skies policy, particularly as most large developments will be on the periphery of the existing settlements.

The NPSG notes and applaud the aspiration to remove harmful effects of noise and fume pollution. The NPSG asks EHDC to consider alleviating the pollutant effects to residents adjacent to the A31 in Four Marks, particularly adjacent to the local Centre and surgery.

Similarly, the NPSG approves of the restraint on developments that would cause a severe impact on the operation of the local highway networks, especially as our residents already suffer delays caused by traffic on the A31, preventing them leaving their dwellings, and the congested access roads which have been identified as being almost at capacity by Hampshire Highways, and also the requirement for developers to pay for improvements to alleviate such issues.

The NPSG welcomes the provision of lorry parking associated with distribution centres.

Policy DGC3 New and improved community facilities

The NPSG welcomes Policy, and note that it acknowledges that many community facilities 'need to be used' to help them survive the changes in our social life, by remaining fit for purpose, thus redevelopment/ improvement of such locations will be granted, providing such plans comply with the DLP.

The NPSG agrees that the future need for any new facility must be fully justified, together with the details of the robust management organisation to run it, particularly when adjacent to new housing developments.

The NPSG supports the consideration of local independent shops as a 'facility', particularly in villages, where many provide the only local retail support to residents.

Policy DGC4 Protection of Community Facilities

The NPSG supports the Policy, particularly as it echoes our Neighbourhood Development Plan, both as work to prevent the loss of:

- community green space, unless proved to be surplus due to poor quality, accessibility or a better alternative has been provided in the locality, or
- other community facilities, unless superfluous to need, and a similar service is easily accessed, or
- for change of use, unless it can be demonstrated the facility is not viable.

Policy DGC5 Provision and enhancement of open space, sport and recreation

The NPSG welcomes the Policy, particularly as it supports NPPF paragraph 8 (b) supporting the Social aspect of a development, particularly as open space and sports facilities add to public wellbeing and social cohesion, bringing further benefits in supporting local wildlife, and the natural realm by supporting SuDS and natural water absorption.

The NPSG believes that the EHDC policy for developments of 10 dwellings or more should include the requirement that some of the open space should be a roofed structure to allow for protection from inclement weather and hot sun. It is imperative that this space is on or very close by the development or the requirement of NPPF8(b) will be lost.

The NPSG agrees that the design of such space must consider a holistic view of its location and contribute to its placemaking, green/ blue environment and nature conservation, but would welcome a clause reviewing to the inclusion of parts any SuDS drainage system or any private foul drainage farm for that, that could be a H&S risk, either of drowning or contamination.

Similarly, any new development should manage its public rights of way network for travel and recreation, including the provision of new links.

09 HOMES FOR ALL

Local Plan Objectives

The NPSG supports the Core Objective A, particularly the emphasis given to helping to deal with the issues of affordability and an ageing population

Our Changing Population

The NPSG supports the emphasis given to the 'Changing Population' but believes that the current draft of the Plan understates the scale of the issues. For example, Table 6.10 of the HEDNA shows that more than 100% of the growth in population will come from the 65+ age group. Furthermore, in Table 6.12 (Population change 2021 to 2038 by broad age bands – East Hampshire (linked to delivery of 632 homes per annum), the total increase in the 65+ age group is 13,034. Based on the most up to date 'affordability ratio,' the Plan assumes that 54% of the growth of the population in East Hampshire will come from people migrating into East Hampshire. Based on that figure (and assuming that this age group are a couple with no dependents) then the requirement for new homes for this age group in the District would be 3,519. This is an overly simplistic analysis, but it does serve to highlight the scale of the demographic change and the NPSG does not believe that this is reflected adequately in the Plan.

Housing Need

The NPSG recognises that the housing need has been worked out using the Standard Method as explained in the Housing Technical Note update September 2023. However, the NPSG would like to make two points

- i) There is no allowance made for the impact of the South Downs National Park. As a result, 83% of the planned new housing will be built on 43% of the land area. The NPSG believes that this misrepresents the '**local**' housing need. If the 10,982 new houses were to be 'divvied up' between the LPA and the SDNP on the basis of land area it would reduce the number of homes required in the LPA by **4,362** homes. The NPSG recommends that quantum of homes deemed necessary for the LPA be reviewed and note that the PPG allows for strategic-making authorities that do not align with local authority boundaries, such as National Parks, to identify a housing need figure using a method determined locally.
- ii) The Affordability Ratio significantly distorts the assessment of '**local**'. housing need. The latest Affordability Ratio (based on data up to March 2023) is 54%. This means that an additional **3,857** houses will need to be built in the District over and above the number required to meet the local need.

The NPSG approves and support Policies:

Housing Supply

Policy H1: Housing Strategy

The NPSG supports the Spatial Strategy as outlined in the document. However, the NPSG is concerned about the additional buffer of 643 extra homes that has been built into the Plan.

Firstly, the NPSG believes that the buffer is not necessary as the Plan already provides for a number of houses that is 54% more than the local baseline need – a potential over-provision of 3,857 homes. Secondly, the DLP already provides for the meeting the potential unmet needs of a neighbouring sub region – a potential over-provision of 4,362 homes.

The NPSG supports the policies H2.1, H3.1, H4.1 as described on page 220. (The NPSG notes however, that these should probably be labelled as H1.2, H1.3 and H1.4)

Policy H2: Housing Mix and Type

The NPSG supports the statement in Policy 2.1 which highlights the need for:

- a. *need for smaller homes;*
- b. *requirements of an ageing population and people wishing to downsize, including the provision of single-storey dwellings;*

However, the NPSG believes that the DLP significantly understates the scale of the challenge that the District faces. The scale of the challenge can be seen from

- i) *The HEDNA.*
The HEDNA shows (Table 6.10) that more than 100% of the growth in population will come from the 65+ age group. Furthermore, in Table 6.12 (Population change 2021 to 2038 by broad age bands – East Hampshire linked to delivery of 632 homes per annum), the total increase in the 65+ age group is 13,034. This could mean that some 3,500 new homes would be required for this group alone.
- ii) *Affordability.*
With the Affordability Ratio of 54% there is clearly an affordability crisis. The most effective way to reduce the Affordability Ratio would be to have a policy that all new homes should be put on the market at a price that is below the median house price for the District.

Both these demographic trends would benefit from more robust policies for market housing. The NPSG recommends that the policy for smaller houses should be much more specific. The NPSG recommends that the policy includes a target for the percentage of new homes that are 1-2 bedroom homes.

Policy H3: Affordable Housing

As discussed above, there is clearly an affordability crisis in East Hampshire. This is made clear in the Reg 18 (2) document currently being consulted on. This states that the 'need' for affordable housing over the Plan period is **11,647** homes or over 100% of the total. So, logic would suggest that **ALL** of the new homes built should be affordable.

With the scale of this challenge, the priority must be to address this through policies that direct the industry to build market houses below the median house price for the District.

However, the NPPF defines 'Affordable housing' as “ *housing for sale or rent, for those whose needs are **not met** by the market*”. This results in there being two different concepts when considering affordability

- i) Market houses below the median house price for the District
- ii) Houses for those whose needs are not met by the market.

In policy terms it will be necessary to allocate targets to these two discrete categories.

Policy 3.1 recommends that 40% of all development *which increases the supply of housing by 10 dwellings or more (or is on sites of over 0.5 hectares) will be required to provide at least 40% of the net number of dwellings as 'affordable housing'*.

This suggests that there is a need for a robust policy to ensure that the market provides 60% of the overall need with 'housing that people can afford' (i.e. below the median house price for the District). If there are robust policies to ensure that the affordability crisis is addressed by the market, then the target of 40% of 'affordable homes' as defined by the NPPF is supported.

The NPSG welcomes the target set for social housing as this is one of the major challenges highlighted by the HEDNA. However, the NPSG is concerned that this underestimates the scale of the need in the District.

The NPSG does, however have concerns, about policy H3.5. The whole issue of viability has to be considered in the context of the affordability crisis. With the affordability crisis the priority must be to build houses that people can afford. To support this imperative, it will be necessary for any viability calculation to be based on a modest rate of *Return of Capital over Expenditure* (ROCE).

Policy H4: Rural Exception Sites .

The NPSG supports policy the Policy subject to the following comments, the NPSG recommends that

- i) With regard to point a), in order to support local democracy, the local need should be agreed by the Parish Council as well as the LPA
- ii) With regard to point i), any provision of market housing should be at a price below the median house price for the District

Policy H5: Specialist housing .

Although the NPSG supports the Policy, the NPSG is surprised at the scale of the requirement proposed. The HEDNA shows an increase in population of those 65+ to be 13,034. In this context, the figure included in the Plan of 1,590 requiring specialist care looks very low.

The NPSG have no comments to make on:

Policy H6: Park Home Living .

Policy H7: Gypsies, Travellers and Travelling Showpeople Accommodation . .

Policy H8: Safeguarding Land for Gypsy, Traveller and Travelling Showpeople Accommodation

10 SUPPORTING THE LOCAL ECONOMY

The NPSG is very concerned that the Plan does too little to support employment in the District.

One of the key challenges for the District is the Climate Change emergency. As is made clear in Figure 4.2, the most significant source of CO₂ in East Hampshire is the emissions from transport (43%). A policy priority should be to reduce this level of emissions. One reason for the high levels of transport emissions in East Hampshire is the amount of commuting undertaken in private cars because of the lack of employment opportunities in the District.

As Figure 10.1 demonstrates, in 2011 44% of those in employment commuted to work outside the District. It is likely that more up to date data would confirm that this is now over 50%. Furthermore, the use of the Standard Method and the Affordability Ratio is going to make the situation even worse in the future. The Standard Method/ Affordability Ratio requires that an additional 3,857 new homes (*The Technical Note: Testing the Standard Method Housing Need for East Hampshire (Update)*) are built in the District to accommodate those migrating into East Hampshire from another District.

It would be more consistent with the policy of addressing the Climate Change Emergency if there was a clear policy to enable all those migrating into the District to be able to find employment within the District. The NPSG recommends that policies are included within the Plan that seek further sites for employment that are located close to efficient public transport services.

The NPSG has no specific objections with regard to the detailed policies included within the Plan:

Policy E1: Planning for Economic Development

Policy E2: Maintaining and Improving Employment Floorspace Across the Plan Area

- **Local Employment Sites**
- **Strategic Employment Sites**

Policy E3: Rural economy

Policy E4: Tourism and

Policy E5: Retail Hierarchy and Town Centres

11 DEVELOPMENT MANAGEMENT POLICIES

The NPSG believes that in many of the “DM” policies, the wording is more aspirational than prescriptive and thus open to interpretation, and any challenge will most likely only be resolved by costly litigation.

Some of the supporting text does have some details that would be better placed if contained within the policy itself. The NPSG is aware from the Cherkley Judgement²² that any supporting paragraphs are not considered in law as part of the policy itself.

As would be expected in a Management Policy, it appears that the policies are ‘protective’ to the EHDC area.

There are many references to *Appendix 3* on “Marketing”. The NPSG presumes this is a typo and should be changed to *Appendix D*.

The NPSG approves and support Policies:

Policy DM1: The local ecological network

The NPSG supports the Policy, but the NPSG considers that the wording of DM 1.1 to be vague. It does not appear to be precise in defining the methodology of how the scales of ‘harm’ and ‘benefit’ can be quantified, rather being left as subjective, only to be decided by a legal debate. The NPSG believes that the Policy requires strengthening to make it acceptable.

Policy DM2: Trees, hedgerows and woodland

The NPSG welcomes Policy but believes that Policy DM1.2 requires to be linked to Policy NBE 3 to enable BNG to be quantified, but again this Policy is again vague and needs to be concise in its direction:

²² **IN THE COURT OF APPEAL (CIVIL DIVISION) ON APPEAL FROM THE HIGH COURT OF JUSTICE ADMINISTRATIVE COURT Mr Justice Haddon-Cave [2013] EWHC 2582 (Admin) Date: 07/05/2014**

Before : LORD JUSTICE RICHARDS, LORD JUSTICE UNDERHILL and LORD JUSTICE FLOYD Between : The Queen on the application of Cherkley Campaign Limited Claimant/Respondent - and - Mole Valley District Council and Longshot Cherkley Court Limited

16. Leaving aside the effect of the saving direction, it seems to me, in the light of the statutory provisions and the guidance, that **when determining the conformity of a proposed development with a local plan the correct focus is on the plan’s detailed policies for the development and use of land in the area. The supporting text consists of descriptive and explanatory matter in respect of the policies and/or a reasoned justification of the policies.** That text is plainly relevant to the interpretation of a policy to which it relates but it is not itself a policy or part of a policy, it does not have the force of policy and it cannot trump the policy. I do not think that a development that accorded with the policies in the local plan could be said not to conform with the plan because it failed to satisfy an additional criterion referred to only in the supporting text. That applies even where, as here, the local plan states that the supporting text indicates how the policies will be implemented.

Neutral Citation Number: [2014] EWCA Civ 567 Case Nos: C1/2013/2619, 2622, 3551 and 3781.
https://www.westsuffolk.gov.uk/planning/Planning_Policies/local_plans/upload/Note-1-Appendix-D-Green-Belt-golf-course-R-Cherkley-Campaign-Ltd-v-Mole-Valley-DC-Anr-07-May-14.pdf

- using the term “adequately protects” appears a meaningless statement if scale to compare a development to measure or produce an outcome assessment.
- Policy 2.2 must be made proscriptive by using phrases such as “will not retain” instead of “threaten the retention of.”
- DM2.3, the NPSG is unsure of the legal definition of the word “ancient” The Woodland Trust defines it as ‘*areas of woodland that have persisted since 1600 in England*’. Could EHDC define a second part to the policy to apply to ALL mature (>10 years) woodland, new or ancient, thus enabling landowners to plant woodland to protect their land forever within their lifetime?

Policy DM3: Conservation areas

The NPSG supports the Policy but again have concern of the phraseology that EHDC has used, and suggest:

- DM3.1: but the NPSG suggests the change “aim to preserve” to “will preserve”.
- DM3.2: but suggest in e), the word “unsightly” is one subjective to the beholder and that the language needs to be made more precise and descriptive.
- DM 3.3: the NPSG suggests it needs to have stronger prevention measures before a building or other feature is touched, while still consulting with EHDC/ planners, etc.

The NPSG makes no comment on:

Policy DM4: Listed buildings

Policy DM5: Advertisements affecting heritage assets

Policy DMS6 Shopfronts affecting heritage assets.

The NPSG welcomes its attention to detail.

Policy DM7: Archaeology and ancient monuments

The NPSG supports the Policy particularly because of the Tumuli and major earthwork in Medstead (This is not marked on the heritage asset maps). From reading the Policy, it does not nominate the overarching governing body with decision-making power to define the development, preservation, excavation, etc., of a given site. Would this Decision Maker be the HCC Archeology Service, EHDC or a National body?

The NPSG hopes that this Policy is sufficient to afford protection in the case of an unknown archeological site uncovered by excavation prior to housing, etc. The NPSG realizes that a reputable developer would stop work, until archeological authorities have reviewed the site.

If not, the District could lose an historically important site without proper scrutiny or detailed excavations. It would be prudent to insist that the HCC Archeological Officer as Statutory Consultee responds and requires conditions for every planning application. The definition of ‘archeological’ must be expanded to also encompass more recent industrial and other heritage remains, that might warrant excavation and later museum exhibition, rather than lose important engineering or other heritage.

Policy DM8: Historic landscapes, parks and gardens

The NPSG supports the Policy but believes that the *section c* phrase “does not detract” is again very open to interpretation and similarly in *section d* the use of the word “substantial” is again open to a subjective opinion.

The NPSG makes no comment on:

Policy DM9: Enabling Development

Policy DM10: Locally important and non-designated heritage assets

The NPSG supports the Policy but believes that Policy DM10.1 should define more closely the phrase “locally important”.

The NPSG Makes no comment on:

Policy DM11: Amenity

Policy DM12: Dark Night Skies

The NPSG welcomes the Policy, which the NPSG believes will have a marked effect on the rural parts of the District.

The policy DM12.1 could imply that only areas of EHDC (non-SDNP and SDNP) outside a SPB is a “dark sky” zone, this is confirmed in paragraph 11.84, but this does not address a similar treatment for settlements, such as ‘Four Marks/ South Medstead’ and Medstead whose Parish Councils have ‘Dark Skies’ Policies. Although this might make urban areas less well-lit and safe enough at night and may in certain areas affect crime. Although Police, etc., might have a strong opinion on this, EHDC should define an exclusion zone in urban areas where “dark sky” provision is waived, together with a map, with a tighter exclusion zone near to the edges of the SDNP where dark skies are more rigidly enforced.

The NPSG is very concerned of the recent addition of external lights to dwellings in rural areas, which being points of light, whose illuminance appears to be grossly over specified. The NSPG request that Planning Officers add a condition successful application for any new residential development, new build (both developer or self-build) or residential extension to limit the illuminance of such external luminaires, and the extent of the 3D envelope of illumination,

Policy DM13: Air Quality

The NPSG welcomes the Policy DM13. especially as the Four Marks/ ‘South Medstead’ is transversed by the A31, which imposes poor air quality on residents who live adjacent to it. It is noted in the EHDC *Draft Local Plan 2021-2040 (Regulation 18) Transport Background Paper* January 2024, issued as part of this consultation the traffic build up during the day and the MOT Map, found in Appendix 11A. The number of dwellings to trigger an Air Quality Assessment must be defined in the Policy and define the catchment area to be considered.

We ask EHDC to consider the Defra Spatial Map of Noise Pollution of the section of the A31 running through Four Marks/ ‘South Medstead’ and its effect, together with the associated CO₂ and NO_x pollution, on the adjacent residents.

The NPSG makes no comment on:

Policy DM14: Public Art

Policy DM15: Communications infrastructure

The NPSG supports the Policy, although it is not apparent if this Policy includes cable or other ground-based communications structures, including street cabinets. The NPSG appreciates that these are presumably governed by the usual 'road works' policies from HCC Highways and trade bodies but ask EHDC to consider the effect of massing of cabinets owned by different providers.

Policy DM16: Self-build and custom housebuilding

The NPSG supports the Policy but has concerns on the viability of some candidates commencing self-build projects, and the subsequent effects on the immediate area of any non-completed project.

Policy DM17: Backland development

The NPSG supports the Policy and notes that it is in line with M&FMNP *Policy 1 A Spatial Plan for the Parishes*.

Backland development (actual garden plus owners' field behind, etc.) can create a massive change to the local character from say a linear development along a road, or even an "estate" type cul-de-sac development where there is garden space for more houses. Hence the SPBs agreed with NP groups and EHDC must be carefully drawn to minimize the size of backland land sites availability for the local plan period.

However, this Policy will not stand if the District does not have a 5 Year Land Supply. Due to the current lack of a 5YLS, in Four Marks/ 'South Medstead', for example, three of the four 'allocated sites' are currently the subject of the Planning process as "speculative" applications outside the current SPB, and to be adjudicated, yet they are directly backland development outside the SPB, which would be rejected under DM17 or its predecessor policy.

The NPSG is very protective of its M&FMNP *Policy 1 A Spatial Plan for the Parishes*²³ and have grave concerns regards to extent of some of the proposed modifications to the SPBs an noted in the *Interim Settlement Policy Boundary Review Background Paper*²⁴, particularly the new changes including long 'burgage plots', which are very common in the Parishes of Medstead and Four Marks, and in a Planning Application, when several are joined together can give rise to cul-de-sac back garden development, which is contrary to the M&FMNP Policy.

To protect our Policy the NPSG insist that the re drawing of the SPB to contain a new allocated site must only take place on the 'making of the ne Local Plan.

²³ EHDC Porta: Medstead and Four Marks Neighbourhood Plan
<https://www.easthants.gov.uk/media/4538/download?inline>

²⁴ EHDC Portal: EHDC DLP Supporting Papers: Interim Settlement Policy Boundary Review Background Paper
<https://www.easthants.gov.uk/sites/default/files/2024-01/Interim%20settlement%20policy%20boundary%20review.pdf>

However, the NPSG recognizes DM17 can thereafter protect or regulate backland development within the agreed new SPB, that is not a major issue to the character of the local area.

The NPSG makes no comment on:

Policy DM18: Residential extensions and annexes

Policy DM19: Conversion of an existing agricultural or other rural building to residential use

Policy DM20: Rural worker dwellings

Policy DM21: Farm & forestry development and diversification

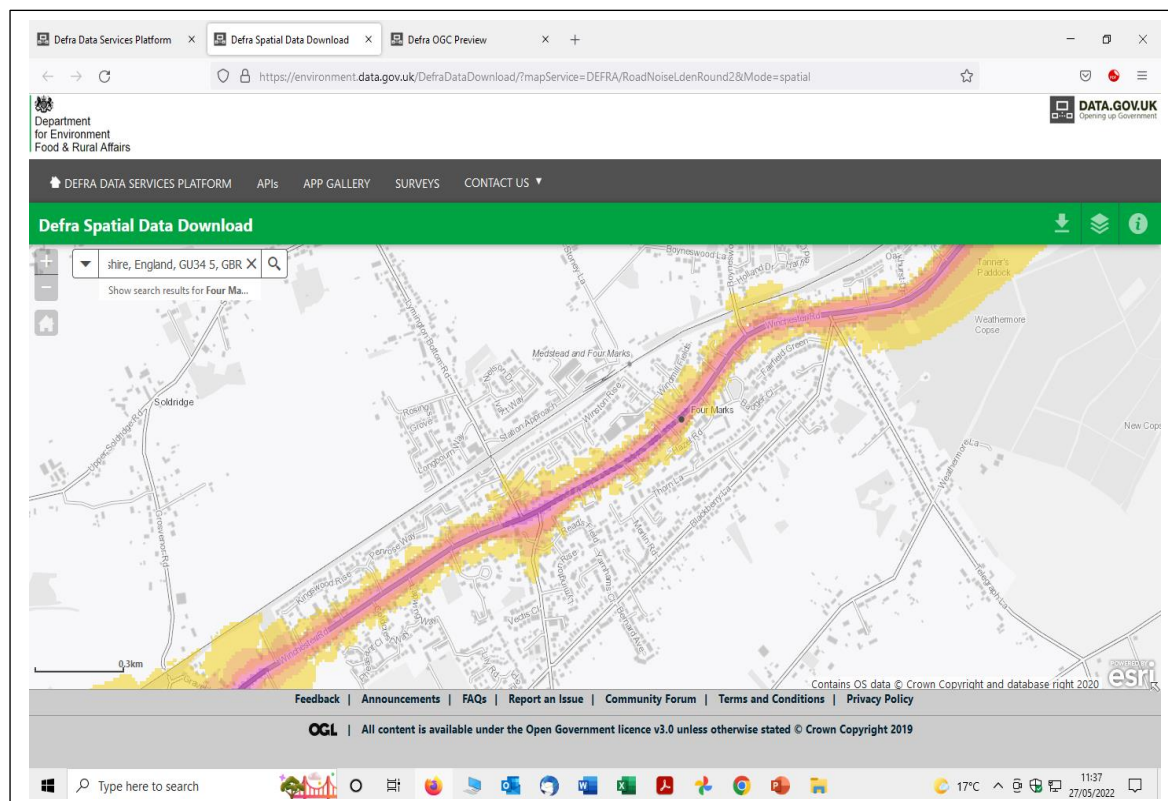
Policy DM22: Equestrian and stabling development

Policy DM23: Shopping and Town Centre Uses

Policy DM24: Alton Town Centre – primary shopping frontage

APPENDIX 11A TRANSPORT DATA AFFECTING AIR QUALITY

Pollution: Noise, Carbon Dioxide and Nitrous Oxide.



Defra Spatial Map of Noise Pollution footprint along the A31 in Four Marks Settlement

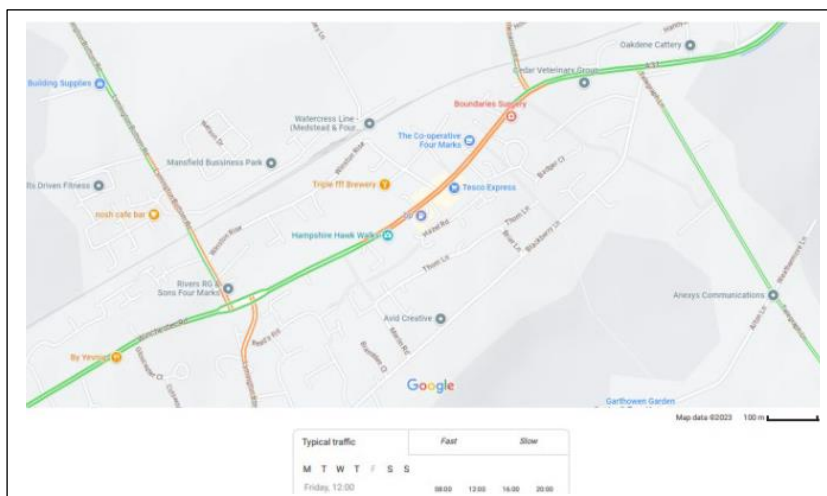
This map shows data indicating the level of noise according to the strategic noise mapping of road sources within areas with a population of at least 100,000 people (agglomerations) and along major traffic routes.

Lden indicates a 24 hour annual average noise level with separate weightings for the evening and night periods. Noise levels are modelled on a 10m grid at a receptor height of 4m above ground, polygons are then produced by merging neighbouring cells within the following noise classes: 75.0+ dB, 70.0-74.9 dB, 65.0-69.9 dB, 60.0-64.9 dB, 55.0-59.9 dB, <54.9 dB

This data is a product of the strategic noise mapping analysis undertaken in 2012 to meet the requirements of the Environmental Noise Directive (Directive 2002/49/EC) and the Environmental Noise (England) Regulations 2006 (as amended).

It would be expected that until EV transport is fully in place, that similar map of existing CO₂ and NO_x pollution would be relevant for residents living in the vicinity of the A31.

Current traffic congestion throughout the day have been highlighted in the supporting *Transport Background Paper*²⁵, January 2024, especially page 165, with the google traffic map for 12.00 on an average Friday which indicated:



Average Friday 12:00

Congestion is shown at the following locations:

- Winchester Road (A31) - Westbound (650m from Charters Close,) and Eastbound (520 m west of Boundaries Surgery)
- Telegraph Lane - Northbound (140m south of junction to the A31)
- Boyneswood Road Northbound (120 m from A31 Junction), and Southbound (120 m A31 from Holland Drive),
- Lymington Bottom - Northbound (50 m A31 Junction From War Memorial),
- Lymington Bottom Road - Southbound (60 m A31 Junction from Lymington Close), and Northbound (60 m A31 Junction from Lymington Close),
- Lymington Bottom Road railway bridge - Northbound (75 m Bridge from Winston Rise) and Southbound (100 m Bridge from Watercress Surgery and Bridge to 75m to Winston Rise).

The NPSG request EHDC to consider the effects of this pollution, together with any increase in pollution as a result of any increase in housing or employment, that increases the use of the A31 through the villages

It is reported at the recent Appeal against the refusal of Planning permission for 46 Lymington Bottom²⁶, that the current loading of the A31 at the Lymington Bottom/ Lymington Bottom road junction was at capacity 0.81 rising to 0.86 in 2024.

HCC has the traffic figure data from a recent survey.

²⁵ EHDC Portal: EHDC DLP Supporting Papers: Transport Background Paper
<https://www.easthants.gov.uk/media/8773/download?inline>

²⁶ EHDC Planning Portal: 56082/004 | Outline planning application for demolition of 46 Lymington Bottom, Four Marks and the erection of up to 60 dwellings with vehicular access point, public open space, landscaping and sustainable drainage systems (SuDS). All matters reserved except for means of access (additional information and revised Travel Plan received 21/08/23) | Mount Royal, 46 Lymington Bottom, Four Marks, Alton, GU34 5AH
https://planningpublicaccess.easthants.gov.uk/online-applications/applicationDetails.do?keyVal=EHANT_DCAPR_254025&activeTab=summary

12 SITE ALLOCATIONS

After looking at the location of the proposed sites in its associated paper commenting on the proposed Settlement Hierarchy, Appendix 13.5.A Philosophy employed EHDC to determine Settlement Hierarchy and Appendix 15.5.E DLP Chapter 12 - Site Allocations, in the light of the logic in setting the proposed Settlement Hierarchy, the NPSG has observed that some of the most Tier 3 sustainable settlements have been passed over, although they have available development sites with reasonable or better accessible scores.

The NPSG notes that this is contrary to the proposed Policies CLIM 1, CLIM2 and CLIM 5.

Analysis of Allocations.

EHDC has revised its settlement Hierarchy:

Tier in Hierarchy	Names of Settlements
1	Alton (including Holybourne)
2	Horndean, Liphook, Whitehill & Bordon (including Lindford)
3	Bentley, Clanfield, Four Marks (& South Medstead), Grayshott, Headley, Holt Pound, Rowlands Castle
4	Arford, Catherington, Headley Down, Kingsley, Lovedean, Medstead, Ropley
5	Beech, Bentley Station, Bentworth, Bramshott, Griggs Green, Lasham, Lower Froyle, Oakhanger, Passfield Common, Ropley Dean, Shalden, Upper Froyle, Upper Wield

The NPSG notes that the LPA propose 42 sites across 5 Tiers of settlements, some 32 sites re residential, 3 G&T and 2 medical, over the Tiers 1 to 5 of the District.

Tier	Houses	G&T	Alton	Bordon	Horn dean	Liphook	Clanfield	Four Marks / 'South Medstead'	Rowlands Castle	Bentley	Holt Pound	Medstead	Headley Down	Catherington	Bentworth
1	1,264	6 Plots	1,264												
2	1,055			623	320	112									
3	574	2 Pitches					180	210	2 Pitches	145	20	19			
4	28	6 Plots										15	6 Plots	13	
5	40														10

The housing allocations

- Tier 1 Dwellings: 1,264, over 3 settlements
- Tier 2 Dwellings: 1,055, over 3 settlements
- Tier 3 Dwellings: 574, over 5 settlements
- Tier 4 Dwellings: 28, over 2 settlements and
- Tier 5 Dwellings: 40, over 2 settlements,

The NPSG broadly agrees that the spatial strategy as shown in the DLP Figure 3.1 Key Diagram, which indicates in Policy H1:

‘ Housing Strategy identifies a broad distribution of new housing that follows the settlement hierarchy by distributing more new homes to the higher tiers of the hierarchy where development is to be located, is generally aligned with the Settlement Hierarchy, such that the greater proportion of development is sited in the larger and more sustainable settlements. ‘

The NPSG supports the proposed allocation strategy of strategic sites, together with the logic for developments at Neatham Down and Bordon that are adjacent to the largest and most sustainable settlements in the LPA area.

The NPSG believes that the delivery of such sites are crucial for the success of this Local Plan but have grave concerns regarding the final logic on setting the Settlement Hierarchy using a subjective judgement that the local population is a common factor in supporting the ‘viability’ of a settlement. The NPSG considers this philosophy flawed, and it does not produce a true Settlement Hierarchy for the District outside the National Park.

The NPSG notes that Grayshott has not been asked to contribute, although has two sites that could be brought forward, whilst the Tier 4 Settlements of Catherington and Medstead provide 28; and the Tier 5 settlements of Bentworth and Lovedean provide 40. (**Note:** *The Revised Settlement Hierarchy, 2024, identifies Lovedean as a Tier 4 settlement*).

In Tier 1, Alton, the largest settlement in the District, has taken the major portion of the allocation including the Strategic site of Neatham Down.

The Tier 2 Settlements are allocated:

- Bordon, a designated New Town - 623 Dwellings,
- Horndean -320 Dwellings,
- Liphook -112 Dwellings,

The Tier 3 settlements are allocated:

- Bentley - 20 Dwellings,
- Clanfield - 180 Dwellings,
- Four Marks / ‘South Medstead’ - 210 Dwellings,
- Grayshott - 0 Dwellings,
- Headley - 180 Dwellings,

- Holt Pound - 19 Dwellings,
- Rowlands Castle -145 Dwellings,

Similarly, the Tier 4 Settlements are allocated:

- Arford - 0 Dwellings,
- Catherington - 130 Dwellings,
- Headley Down – 6 traveller plots
- Kingsley - 0 Dwellings,
- Lovedean - 30 Dwellings,
- Medstead - 15 Dwellings,
- Ropley - 0 Dwellings,

And Tier5

- Beech- 0 Dwellings
- Bentley Station- 0 Dwellings
- Bentworth - 10 Dwellings,
- Bramshott - 0 Dwellings Griggs Green - 0 Dwellings
- Lasham - 0 Dwellings
- Lower Froyle- 0 Dwellings,
- Oakhanger - 0 Dwellings,
- Passfield Common - 0 Dwellings
- Ropley Dean - 0 Dwellings,
- Shalden - 0 Dwellings,
- Upper Froyle, - 0 Dwellings,
- Upper Wield - 0 Dwellings,

The NPSG notes that in the higher Tiers, some of the Settlements with higher *Accessibility Scores in the Revised Settlement Hierarchy Background Paper*²⁷ grading are required to provide a smaller contribution to the District Housing Quantum than others with less facilities, even though they contain acceptable development land put forward by landowners which has been assessed in the *East Hampshire Living Locally Accessibility Study and Decide & Provide Methodology* (Ridge & Partners Report 1).

Review of Allocations

As part of its review of the site allocations the NPSG has considered the effects of surface water flooding as noted on EHDC the Acom Level 1 Strategic Flood Risk Assessment and refers to *Figure 10a Risk of Flooding from Surface Water Map covering the north of the District*²⁸.

²⁷ EHDC Portal: EHDC DLP Supporting Papers: Revised Settlement Hierarchy Background Paper
<https://www.easthants.gov.uk/sites/default/files/2024-01/Revised%20settlement%20hierarchy.pdf>

²⁸ EHDC Portal Acom Level 1 Strategic Flood Risk Assessment and refers to Figure 10a Risk of Flooding from Surface Water Map covering the north of the District
<https://www.easthants.gov.uk/media/7802/download?inline>

The NPSG has reviewed it has extracted the section covering Medstead and Four Marks Parishes, below.

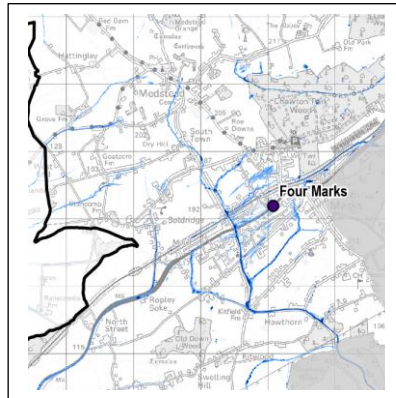
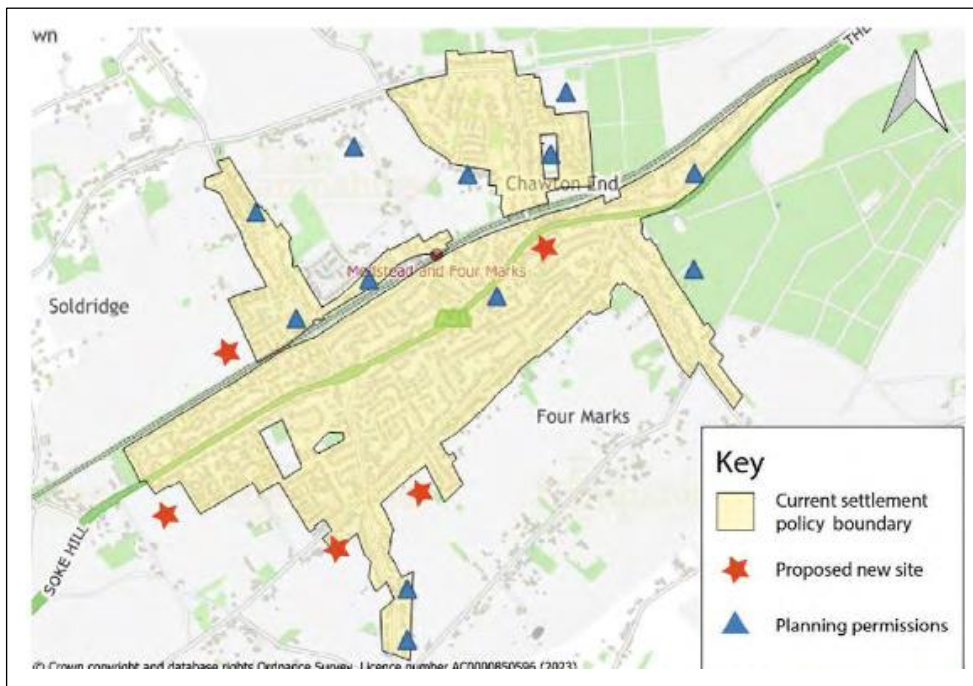


Figure 10a Risk of Flooding from Surface Water Map covering the north of the District.

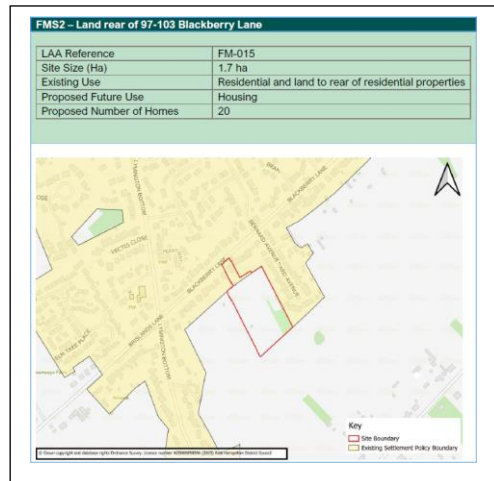
Four Marks



Location of outstanding housing permissions and proposed sites in Four Marks/ 'South Medstead'

FMS 2 Land Rear of 97 to 103 Blackberry Lane

This site has an *East Hampshire Living Locally Accessibility Study and Decide & Provide Methodology (Ridge Report 1)* accessibility score of 8²⁹.



Pros

A cycle way could be opened up via Yarnhams Close to Reads Field to connect with the existing cycleway network between Winchester Road and the Oak Green Parade.

Its location is closer than some other sites to Oak Green and Lymington Barns

The surface water Flood Map :



²⁹ Source of Data EHDC Portal: Draft Local Plan 2021 to 2028 Reg 18 Consultation. . East Hampshire Living Locally Accessibility Study and Decide & Provide Methodology (Ridge Report 1) Chapter 5: Table 5.5 – Sites not within 400m of a Regular Bus Service Bus Stop or an LCWIP Scheme p53
<https://www.easthants.gov.uk/sites/default/files/2024-01/Report%201%20-%20accessibility%20study.pdf>

Cons

Some surface water flooding, The main issue will be consequent effect on run off to Lymington Bottom.

The status of the aquifer as an 'SPZ 2 area' is limiting to possible drainage solutions.

Distance to Oak Green without extra infra structure

Pressure on Lymington Bottom junction

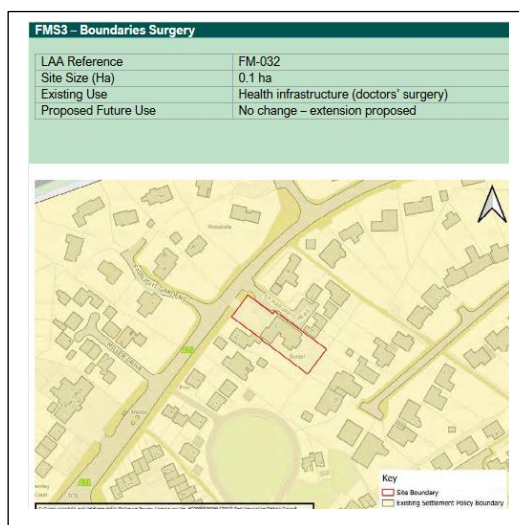
With no 5 Year Land Supply this site could increase speculative development on adjacent land in immediate vicinity being granted permission due to the ability for cycle and pedestrian access between sites.

PC & NP requirements to be able to support an application from this allocated Site

- There would be additional pressure on the junctions at the top and bottom junctions of Blackberry Lane. Mitigation would need to take place in order to make the added pressure acceptable.
- There would be added Highway congestion and pressure onto the A31 from Lymington Bottom Road and Telegraph Lane. Mitigation would need to take place in order to make the added pressure acceptable.
- Housing would need to be truly affordable and include greater than 40% social housing and support the need for 1,2 and 3 bedroom dwellings.
- Insulation level must achieve 15 kWhr/m²/yr as a minimum.
- On site generation (PV) must use all available roof space
- Improved provision of cycle/pedestrian connections to Oak Green and Lymington Barns.
- Improvements to healthcare infrastructure would be needed.

FMS3 Boundaries Surgery

This site has an *East Hampshire Living Locally Accessibility Study and Decide & Provide Methodology (Ridge Report 1)* accessibility score of 21³⁰.



³⁰ Source of Data EHDC Portal: Draft Local Plan 2021 to 2028 Reg 18 Consultation. . East Hampshire Living Locally Accessibility Study and Decide & Provide Methodology (Ridge Report 1) Appendix D Accessibility Study Results (SHLAA) p106
<https://www.easthants.gov.uk/sites/default/files/2024-01/Report%201%20-%20accessibility%20study.pdf>

Pros

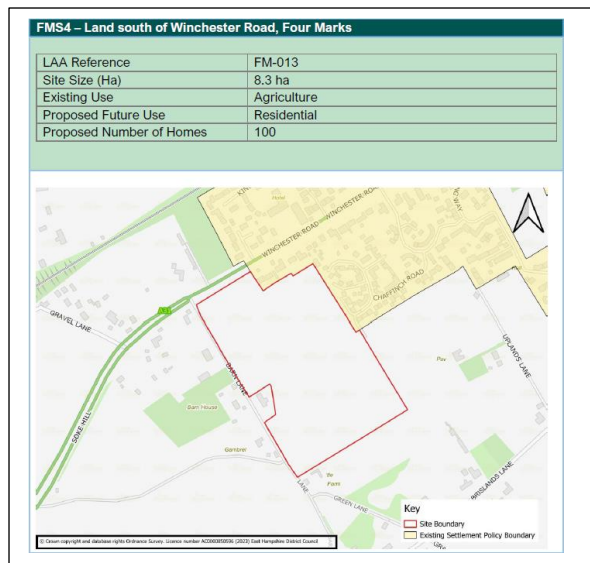
This site is in the centre of the settlement.

Cons

Although there is a bus route with a nearby stop, the site has minimal parking, which already causes congestion in its car parking area.

FMS4 Land South of Winchester Road

This site has an *East Hampshire Living Locally Accessibility Study and Decide & Provide Methodology (Ridge Report 1)* accessibility score of 11³¹.



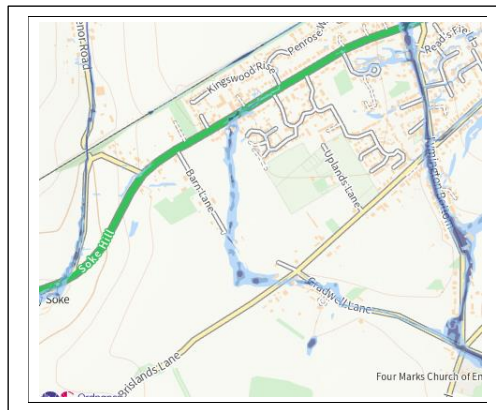
Pros

The site has the benefit of having direct Access to and from A31.

An extension to the cycle way is possible, to link to the existing one on Winchester Road, linking to Lymington Bottom which extends to Oak Green via Reads Field and the linking footway to Hazel Road; and also, north to Lymington Barns.

A PRow could be included to link Barn Lane PRowS to the Recreation Ground.

The Local Area surface water flood map shows:



³¹ Source of Data EHDC Portal: Draft Local Plan 2021 to 2028 Reg 18 Consultation. . East Hampshire Living Locally Accessibility Study and Decide & Provide Methodology (Ridge Report 1) Chapter 5: Table 5.4 – Sites within 400m of a Regular Bus Service Bus Stop or an LCWIP Scheme p53 <https://www.easthants.gov.uk/sites/default/files/2024-01/Report%201%20-%20accessibility%20study.pdf>

Cons

No cycle way and pedestrian path to school via Barn Lane and Gradwell Lane.

No cycle way and pedestrian access to recreation ground.

From the map above it is noted that there is some surface water flooding on this site.

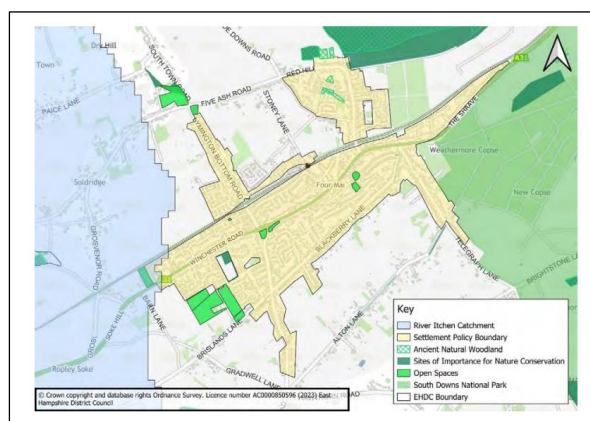
Long way from village centre, unless a convenience store is included on the Winchester Road Frontage

PC & NP requirements to be able to support an application from this allocated Site

Community infrastructure provided :

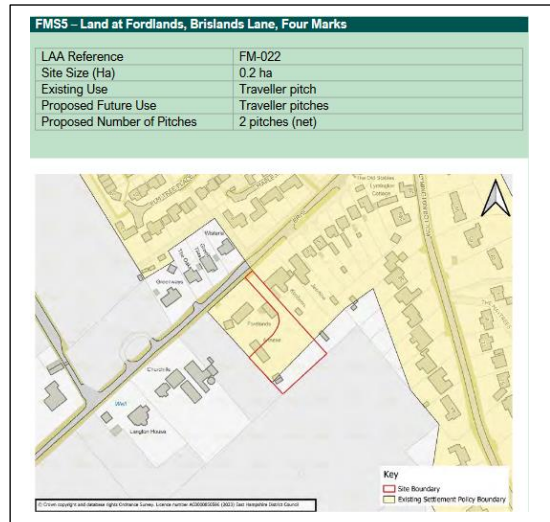
- Multi-purpose community building in close proximity to Four Marks Recreation Ground or enhancement of existing provision (Benians Pavilion).
- A shop with adequate parking which is visible and directly accessible from the A31 to catch passing trade. Any shop would need to have good visibility in order to be viable.
- Houses must be truly affordable and include greater than 40% social housing, and support the local need for 1-, 2- and 3-bedroom dwellings.
- Insulation level must achieve 15 kWhr/m²/yr as a minimum.
- On site generation (PV) must use all available roof space
- Provision of a cycle way to link to the existing one on Winchester Road, linking to Lymington Bottom and extension to Oak Green and Lymington Barns.
- Cycleway/pedestrian access from the site to Gradwell lane for easy access to school.
- Cycleway and pedestrian access from the site to the Recreation Ground.
- Direct Access new site from the A31 and not via adjacent Pheasant Close.
- Improvements to the local healthcare infrastructure would be needed to accommodate the residents of this site.

Part of the site falls within the River Itchen Catchment; therefore, nutrient neutrality issues will need to be addressed.



FMS5 Land at Fordlands, Brislands Lane

This site has an *East Hampshire Living Locally Accessibility Study and Decide & Provide Methodology (Ridge Report 1)* accessibility score of 10³².



Pros

Four Marks is a Gypsy and Traveller village and there are members of the extended community living within the Parish.

It is a discrete location on the edge of the settlement.

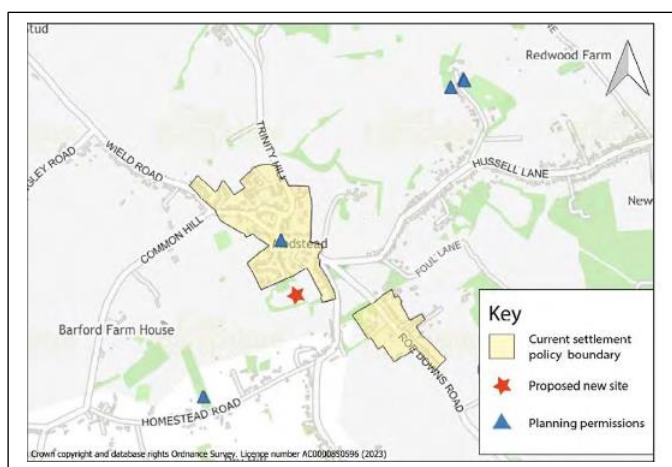
Cons

It is some distance from the facilities at Oak Green Parade.

Medstead

Medstead Village

Current Planning Applications and Proposed Allocations – Medstead

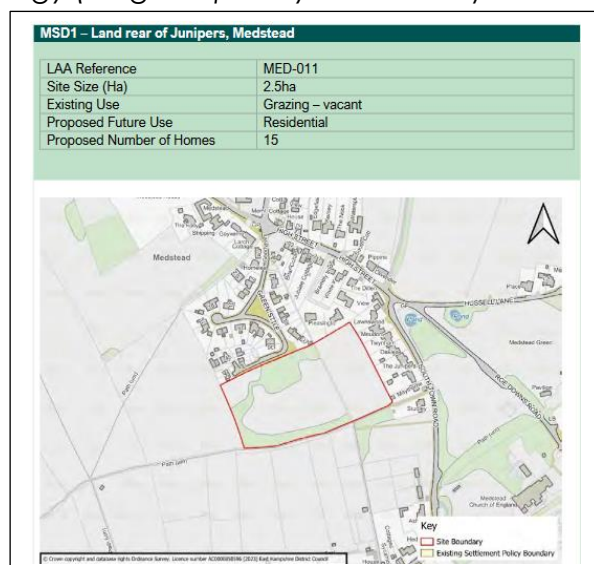


³² Source of Data EHDC Portal: Draft Local Plan 2021 to 2028 Reg 18 Consultation. . East Hampshire Living Locally Accessibility Study and Decide & Provide Methodology (Ridge Report 1) Chapter 5: Table 5.5 – Sites not within 400m of a Regular Bus Service Bus Stop or an LCWIP Scheme p53
<https://www.easthants.gov.uk/sites/default/files/2024-01/Report%201%20-%20accessibility%20study.pdf>

Location of outstanding housing permissions and proposed sites in Medstead

MSD1 Land rear of Junipers

This site has an *East Hampshire Living Locally Accessibility Study and Decide & Provide Methodology (Ridge Report 1)* accessibility score of 14³³.



Pros

It is in the right place, enhance the village centre, Close to infrastructure.

Cons

The only vehicular issue is commuting to employment.

It is noted that there is surface water flooding at Green Stile and High Street/ Wield Road junction.

NP & PC requirements to be able to support application

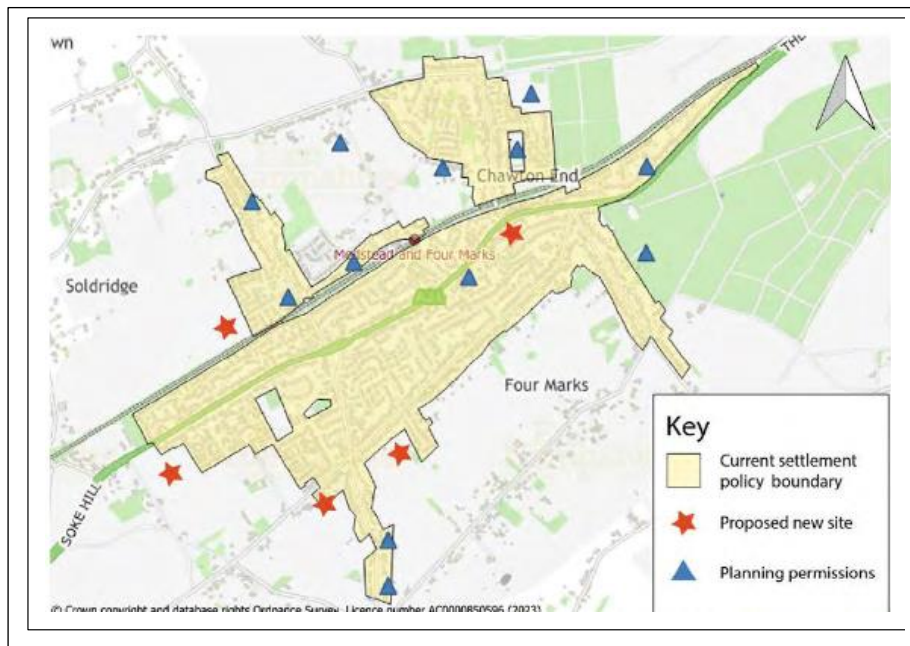
This site is supported by MPC as it will sustain the life of the village

Houses in the development must be truly affordable and include greater than 40% social housing, and support the local need for 1, 2 and 3 bedroom dwellings.

For each dwelling an insulation level must achieve 15kWhr/m²/yr as a minimum, and on site generation (PV) must use all available roof space.

³³ Source of Data EHDC Portal: Draft Local Plan 2021 to 2028 Reg 18 Consultation. . East Hampshire Living Locally Accessibility Study and Decide & Provide Methodology (Ridge Report 1) Chapter 5: Table 5.5 – Sites not within 400m of a Regular Bus Service Bus Stop or an LCWIP Scheme p53
<https://www.easthants.gov.uk/sites/default/files/2024-01/Report%201%20-%20accessibility%20study.pdf>

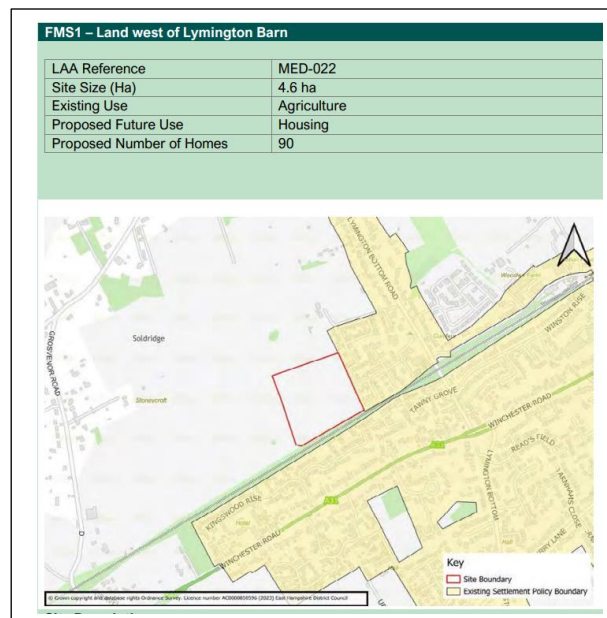
'South Medstead'



Location of outstanding housing permissions and proposed sites in Four Marks/ 'South Medstead'

FMS 1 Land West of Lymington Barns

This site has an *East Hampshire Living Locally Accessibility Study and Decide & Provide Methodology (Ridge Report 1)* accessibility score of 8³⁴.



³⁴ Source of Data EHDC Portal: Draft Local Plan 2021 to 2028 Reg 18 Consultation. *East Hampshire Living Locally Accessibility Study and Decide & Provide Methodology (Ridge Report 1)* Chapter 5: Table 5.4 – Sites within 400m of a Regular Bus Service Bus Stop or an LCWIP Scheme p53
<https://www.easthants.gov.uk/sites/default/files/2024-01/Report%201%20-%20accessibility%20study.pdf>

Longbourn Way looking east, downhill from top, which evidences that at that point the carriageway is much higher above datum than the roof the Lymington Barnes Complex, some 150 m away.



Longbourn Way, looking west, towards the housing known as 'Primrose Hill', showing an example of traffic congestion before the 'S' bend before rising up the hill.

The NSPG note that some of the proposed suggestions to mitigate the traffic management requirements of the road include installing a raised curb that will restrict the carriageway width to enable vehicles to take emergency action.

This proposal will also remove parking spaces to the north side of the road in this area, forcing the vehicles to relocate to the parking area around Lymington Barnes, adding unexpected, and unplanned, use.



Pros

Limited views of the site.

Within acceptable walking distance of some local facilities, e.g. GP, café, greengrocers.

Cons

It is essentially a cul-de-sac on another cul-de-sac, with over 200+ dwellings all using the same single access road.

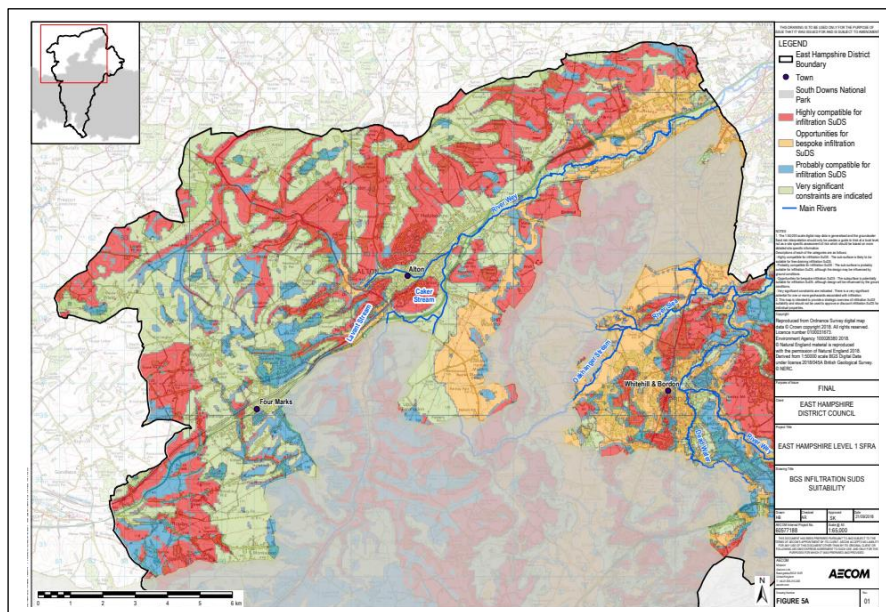
The access road for both pedestrians and road users is currently dangerous. There have been at least 3 accidents there and residents have reported numerous near misses (including dash cam footage). The NPSG questions if the current discussions regarding improvements to the road will result in sufficient mitigation make this location a safe walking/cycling route for the 450+ residents who will be using it?

It is at an excessive distance, which is further exacerbated by some 30 m change in height, to the nearest convenience store on Oak Gren Parade, (e.g. 1.4km to Tesco Express), which must again be traversed by cyclists and pedestrians.

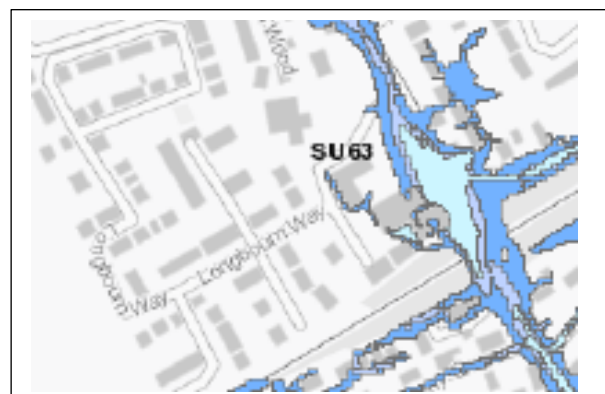
It will cause the loss of Grade 3 agricultural land which is obviously a finite resource.

Increase in traffic will cause negative impact at Lymington Bottom road/A31 junction and the single lane railway under bridge.

The EH Map of Infiltration SUDS suitability for surface water, shows, “*Very significant constraints are indicated*”.



The map below is an extract from the Defra *Risk of Surface Water Flooding Map* in the locality of Longbourn Way and Lymington Barns:



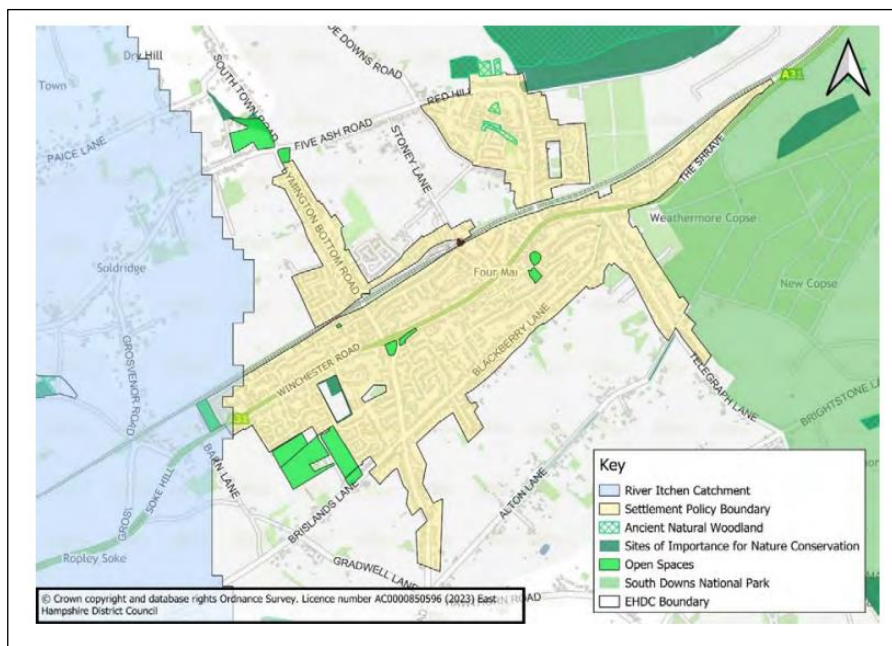
The additional effects of surface water flooding the adjacent estate due to land topography is a real concern, especially as Lymington Bottom Road floods together with the access to the greengrocer 'Clementines'.

Surface water flooding affecting the adjacent estate due to land topography is a real concern. During heavy rainfall, surface water runs down and pools at the bottom of Longbourn Way.

The road is unadopted and doesn't get gritted by the Council. Residents report that during icy conditions it is treacherous and sometimes impossible to negotiate.



Part of the site falls within the River Itchen Catchment; therefore, nutrient neutrality will need to be addressed.



NP & PC requirements to be able to support application

Medstead Parish Council object to the inclusion of this site on moral and H&S grounds. It is not convinced that the Highway mitigation will prevent any RTAs or near misses, which could result in serious injury or worse, on the road between the proposed development, at the top of a reasonably steep gradient, and Lymington Bottom Road will prevent them.

There is greater concern regards to the safety issues associated with climatic effect of ice and snow during winter months, especially as the Climate in Four Marks/ 'South Medstead' is some 2^o C lower than Alton and that the site is located on a ridge, the watershed between the Itchen and Wey, which causes greater exposure to the prevailing southwest wind.

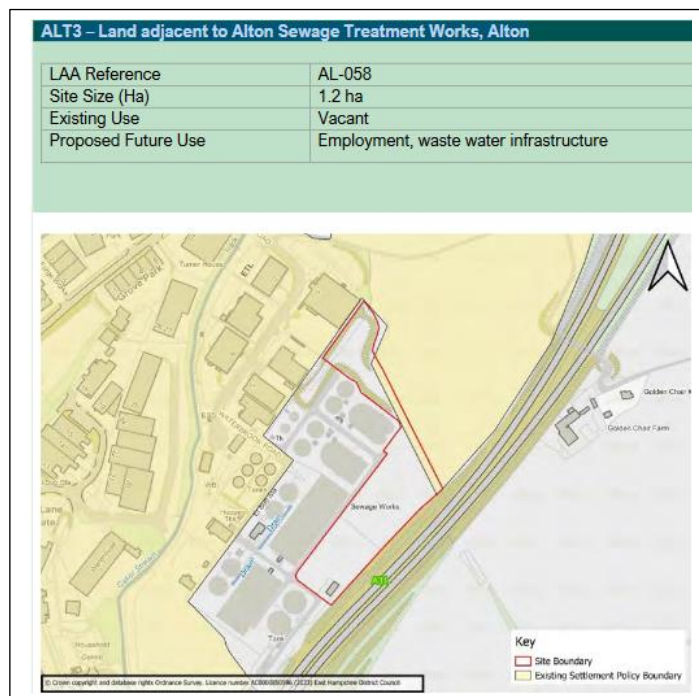
However, should the site be considered as an Allocated site:

Houses in the development must be truly affordable and include greater than 40% social housing, and support the local need for 1, 2 and 3 bedroom dwellings.

For each dwelling an insulation level must achieve 15kWhr/m²/yr as a minimum, and on site generation (PV) must use all available roof space.

Allocation of Other Sites

On reviewing the list of Allocated sites, the NPSG would wish to express our concern regarding the inclusion of ALT3 – *Land adjacent to Alton Sewage Treatment Works, Alton*



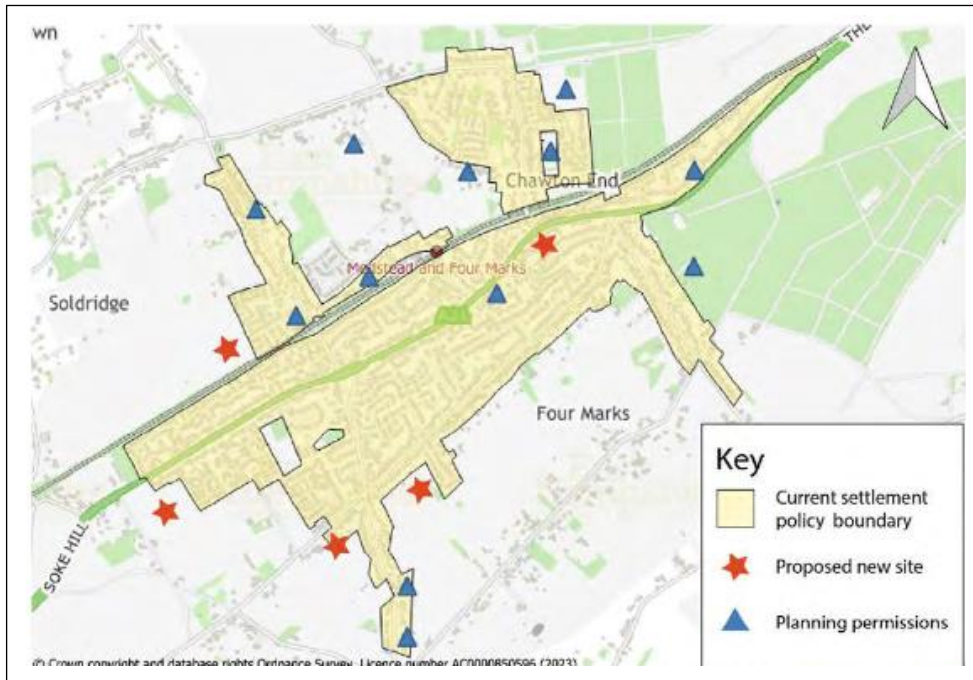
The NPSG is greatly concerned that the removal of expansion land from the WTW will affect the future needs of Alton and the villages to the North South and west that whose foul water is currently processed by the site.

It is known that the Statutory Undertaker will only plan for a capital spend on system development in line with forecast planned development. This DLP appraisal does not appear to take into account the needs of any speculative development planning applications that may be granted at times the LPA does not have a 5 Year Land Supply.

The NPSG would ask that for those reasons this site is removed from the proposed allocations.

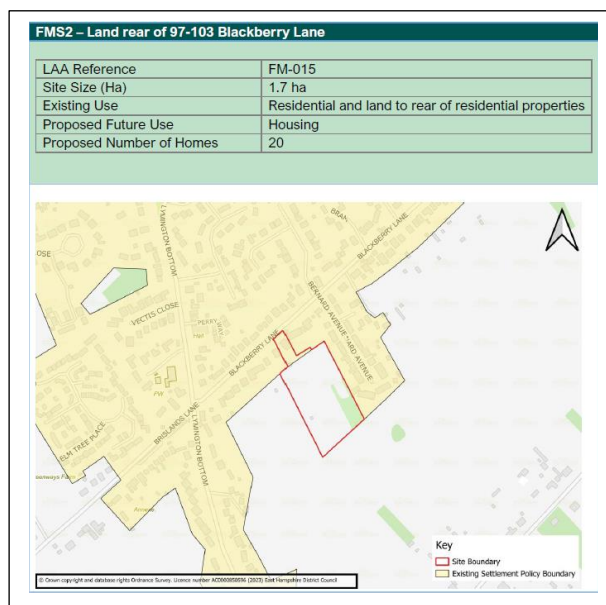
APPENDIX 12A SITE ALLOCATIONS³⁵

Four Marks



Location of outstanding housing permissions and proposed sites in Four Marks/ 'South Medstead'

MS 2 Land Rear of 97 to 103 Blackberry Lane

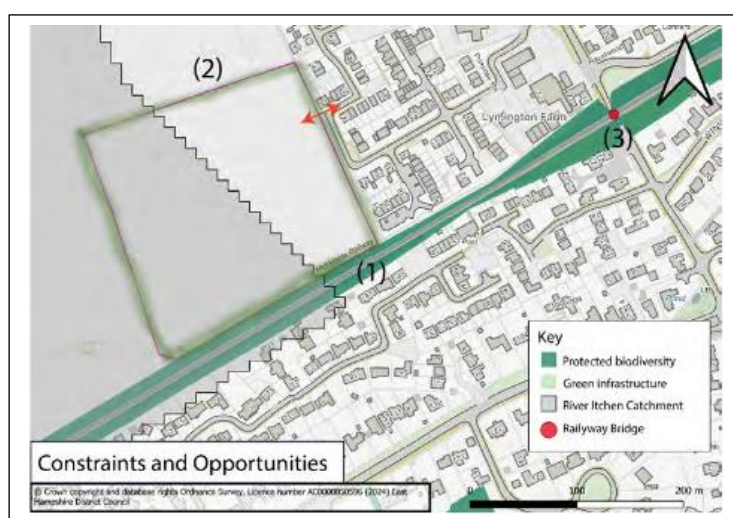


³⁵ Source of Data EHDC Portal: Draft Local Plan 2021 to 2028 Reg 18 Consultation. Chapter 12 <https://www.easthants.gov.uk/media/8744/download?inline>

Site Description

The site is located to the south of Blackberry Lane, adjoining housing to the north and east. Land to the south is greenfield pasture, whilst to the west are the long, open gardens of adjoining houses on Blackberry Lane. This part of Four Marks has an edge-of-settlement character with street frontages populated by mature green infrastructure, which forms many of the residential plot boundaries, and limited highways infrastructure (e.g. there are no streetlights, whilst pedestrian footways only occupy one side of Blackberry Lane).

The site is largely undeveloped and covered by vegetation. There are substantial hedgerows and trees on the western and southern boundaries, whilst some parts of the northern and eastern boundaries appear to be less well vegetated. There is no public access to the site and no views of the undeveloped area from Blackberry Lane. The site includes a residential dwelling at its northern extremity, which connects the site to the public highway. The land is relatively flat, but slopes gently, falling away from the north-east to the south-west. Housing in the site's environs is predominantly of detached houses, but with some semi-detached homes, on plots that vary in size but are often rectilinear and narrow in width. Buildings are typically set-back from the road and follow a strong building line.



List of constraints & opportunities

- *Flood risks: small parts of the site are susceptible to surface water flooding. These areas are located in north of the site, affecting the potential connection to Blackberry Lane.*
- *Water quality: the site is located within a groundwater source protection zone (SPZ2).*
- *Green infrastructure: hedgerows and trees on the site boundaries are important characteristics of the site, helping to integrate it with the rural landscape to the south.*
- *Residential amenity: due to the proximity of adjoining dwellings to the east, there is the potential for adverse impacts on the amenity of existing housing.*
- *Access: connection to the local road network could be achieved via the residential plot at the northern extremity of the site.*
- *Built heritage: no identified constraints to development.*
- *Agricultural land quality: the site and adjoining areas could be Grade 3 agricultural land, which is a finite resource.*

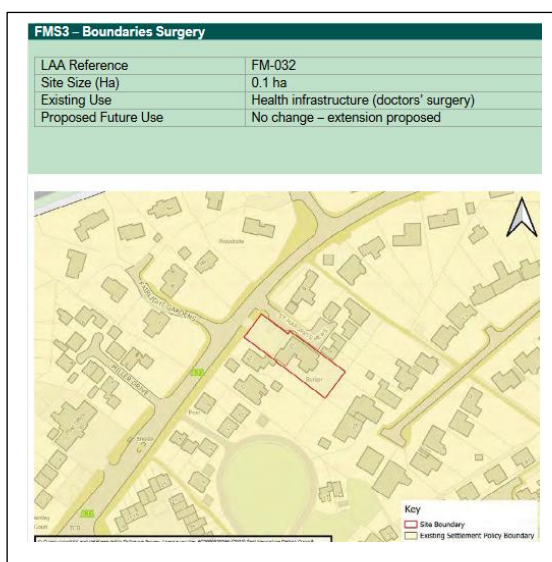
Summary of Reasons for Inclusion

The site scores above average in the Local Planning Authority's Accessibility Study and is relatively unconstrained in environmental terms. Impacts on environmental constraints (flood risks, green infrastructure) could be avoided or mitigated by appropriate design and layout. Maintaining and augmenting green infrastructure on the site boundaries could enhance the site's sense of containment, helping to avoid adverse impacts on residential amenity whilst enhancing its relationship to the wider countryside to the south. Vehicular access to Blackberry Lane could be achieved through the residential plot to the north, but would require the demolition of the existing house. There is scope to support passive design principles and the installation of solar panels to help tackle the climate emergency.

Infrastructure Requirements

- **Education:** No specific requirements identified at this stage.
- **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.
- **Access:** A vehicular access point onto Blackberry Lane and new pedestrian and cycling infrastructure and connections would be necessary to support development. Developer contributions to support off-site improvements that would improve the safety and convenience of walking and cycling to services and facilities in Four Marks could be required. The exact nature of these improvements is currently the focus of discussions in support of a planning application for the site.
- **Cumulative pressures of development on local infrastructure will be dealt with via CIL.P**

FMS3 Boundaries Surgery



Site Description

Boundaries Surgery is an existing doctor's surgery serving the surrounding settlement of Four Marks and South Medstead. The site is located on the southern side of the main Winchester Road (A31), close to the junction with Boyneswood Road. The site is surrounded by residential properties, with larger properties to the south and east. The surgery is set back from the road with a small area of parking in front of the building. Pedestrian footpaths are present on both

sides of Winchester Road, with a signalised crossing point and bus stops to the west of the surgery, close to the main shopping parade of Four Marks.

List of constraints & opportunities

- Access: potential to access the facility via public transport (bus) and on foot, **although no additional parking provision within the site would be feasible.**
- Infrastructure: there is an opportunity within the site to extend this strategic health infrastructure and support growth.
- Residential amenity: due to the proximity of adjoining dwellings, particularly to the north on St Margarets Mews, there is the potential for adverse impacts on the amenity of existing housing.
- Flood risks: there are no identified flood risks for this site.
- Built heritage & biodiversity: no designated constraints to development.

Summary of Reasons for Inclusion

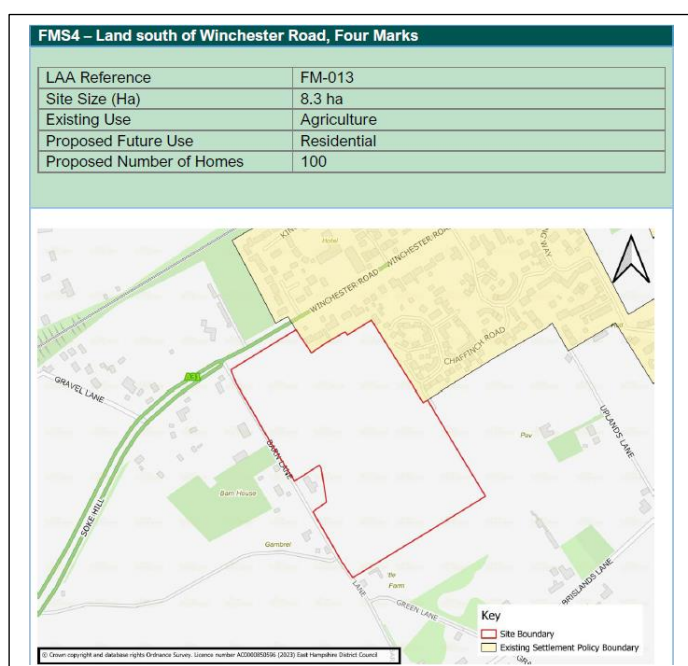
Boundaries Surgery is a key health facility in Four Marks. It is currently over-capacity and population growth would exacerbate this further. A small extension to the rear of the surgery, coupled with internal reconfiguration would enable this surgery to expand its clinical space to meet the healthcare needs of the community, and to ensure that the facility is fit for the future. The surgery is centrally located close to other services and facilities, and is accessible by footpaths and rights of way within Four Marks. Nearby bus stops enable travel by public transport. There are opportunities to encourage walking and cycling to access the facility.

The extension and internal reconfiguration of this surgery is considered essential infrastructure.

Funding

The project has been allocated £330,000 of CIL funding (2023), and developer contributions will be collected for this proposal from developments in the area (where appropriate), to help deliver this project.

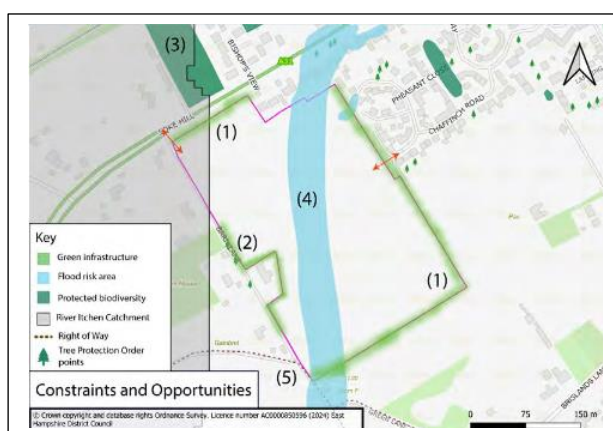
FMS4 Land South of Winchester Road



Site Description

The site lies on the western edge of Four Marks, to south of Winchester Road (A31) and the east of Barn Lane. There is residential development of contrasting (i.e. suburban and rural) character to the north, west and south, whilst allotments and recreational open space adjoin the site to the east. There is a public right of way to the south of the site that connects it to Four Marks Primary School via Green Lane and Gradwell Lane.

The site is largely flat and is in arable farming use. There are mature hedgerows and trees on the northern and southern boundaries, but the eastern boundary is less substantial and there are extensive views into and across the site from Barn Lane in the west. There are powerlines traversing the southern part of the site. Housing to the north and east is a mix of house types including detached, semi-detached and terraced houses, but homes are often detached houses on relatively small plots. Houses to the west and south are detached and more widely dispersed, typically on large or even very large plots.



List of constraints & opportunities

- *Green Infrastructure (1):* mature field boundaries and trees are important characteristics of the site, helping it to integrate with adjoining natural features and providing a sense of containment from the A31 to the north.
- *Biodiversity (2):* there are three single tree protection orders on Barn Lane, directly adjoining the site.
- *Biodiversity (3):* site lies directly opposite a SINC (Four Marks Scrub), which is located to the north of the A31.
- *Biodiversity:* there are areas of priority habitat (lowland mixed deciduous woodland) to the south of the site, one of which adjoins its southern tip.
- *Water quality:* the site is located within a groundwater source protection zone (SPZ2). It lies partly within the catchment of the River Itchen and will need to address nutrient neutrality.
- *Flood risks (4):* parts of the site are susceptible to surface water flooding. These flood risk areas bisect the site.
- *Access:* connection to the local road network could be achieved to the north, via Barn Lane or directly on to the A31 (Winchester Road), whilst additional pedestrian and cycle connections could be achieved through recent housing development at Pheasant Close.
- *Access:* potential to connect the site to the public rights of way network, enabling healthy & active lifestyles.

- *Residential amenity: due to the proximity of adjoining dwellings to the site's northern boundary, there is the potential for adverse impacts on the amenity of existing housing on Winchester Road.*
- *Utilities: there are overhead powerlines traversing southern parts of the site and a mobile phone mast on the southern boundary.*
- *Built heritage: no designated constraints to development*

Summary of Reasons for Inclusion

The site is relatively well-located for local services and facilities in southern and western Four Marks, including the recreation ground, allotments and a primary school; although it is distant from the local centre. The site scores above average in the Local Planning Authority's Accessibility Study. New connections to adjoining rights of way could support healthy and active lifestyles for residents. Impacts on environmental constraints (green infrastructure, biodiversity, flood risks) could be avoided or mitigated by appropriate design and layout.

Maintaining and augmenting green infrastructure on the site's boundaries could enhance its sense of containment, helping to avoid adverse impacts on residential amenity for dwellings to the north. New vehicular access could be provided to the A31, although further consideration and discussion with the highway authority would be needed. The dimensions of the site could facilitate a broadly east-west layout for development, which would support passive design principles and the installation of solar panels for meeting the design requirements associated with the climate emergency.

Infrastructure Requirements

- *Education: No specific requirements identified at this stage.*
- *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.*
- *Access: A vehicular connection to either Barn Lane (and its subsequent improvement) or directly to the A31 Winchester Road could be provided, but both options require further consideration with the highways authority to understand the potential impacts on road safety and if/how these could be mitigated. New walking and cycling infrastructure and connections would also be necessary to support development.*
- *On-site drainage: Significant constraints have been indicated for infiltration sustainable drainage systems. Appropriate infrastructure will be required to mitigate flood risks.*
- *Cumulative pressures of development on local infrastructure will be dealt with via CIL*

FMS5 Land at Fordlands, Brislands Lane

FMS5 – Land at Fordlands, Brislands Lane, Four Marks	
LAA Reference	FM-022
Site Size (Ha)	0.2 ha
Existing Use	Traveller pitch
Proposed Future Use	Traveller pitches
Proposed Number of Pitches	2 pitches (net)

Site Description

The site lies on the southern side of Brislands Lane, on the western edge of Four Marks. It is located to the rear of the existing residential property 'Fordlands' and consists of an existing permanent traveller pitch, which is situated to the south-west of the plot. Residential properties are located to the north, east and west of the site, whilst an area of greenfield pasture adjoins the site to the south.

The site has been previously developed and largely consists of buildings and areas of hard-standing. The site entrance is to the north-east corner and it is enclosed on three sides by mature trees and vegetation. The land is relatively flat within the site, but falls away to east towards Lymington Bottom. Adjoining houses are located closer to Brislands Lane within their plots, which are relatively large, typically rectilinear and narrow in width.

List of constraints & opportunities

- **Green infrastructure:** mature trees and hedgerows are important characteristics of the site, providing a sense of containment and helping it to integrate with the wider landscape.
- **Residential amenity:** due to the proximity of adjoining dwellings, there is the potential for adverse impacts on the amenity of existing housing on Brislands Lane.
- **Access:** connection to the local road network could be achieved through the existing property of 'Fordlands'.
- **Flood risks:** no identified flood risks for this site.
- **Water quality:** the site is located within a groundwater source protection zone (SPZ2).
- **Built heritage:** no identified constraints to development.

Summary of Reasons for Inclusion

This site has the potential to deliver two traveller pitches to help meet the identified need, on a site that is primarily within the settlement. The principle of use of the rear of the property for traveller accommodation has already been established by an existing planning permission. The site is relatively well-located for local services and facilities in western and southern Four Marks, including the recreation ground, allotments and a primary school; although it is distant from the local centre. The site scores above average in the Local Planning Authority's Accessibility Study. Impacts on mature green infrastructure could be avoided by appropriate design and layout that allows its retention. This would also help to avoid or mitigate adverse impacts on residential amenity for adjoining properties. There are few other environmental

constraints (due to nature of traveller pitches, disturbance to groundwater sources is unlikely). Vehicular access could be provided to Brislands Lane.

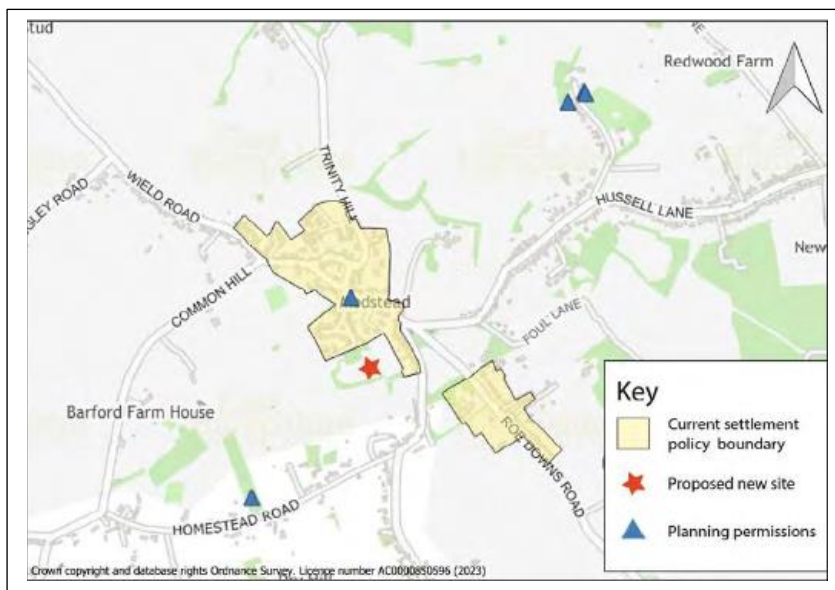
Infrastructure Requirements

- Education: No identified requirements at this stage.
- Health: No identified requirements at this stage.
- Access: A connection to Brislands Lane would be necessary to support the development.
- On-site drainage: Significant constraints have been indicated for infiltration sustainable drainage systems. Appropriate infrastructure will be required to mitigate any flood risks.
- Cumulative pressures of development on local infrastructure will be dealt with via CIL.

Medstead

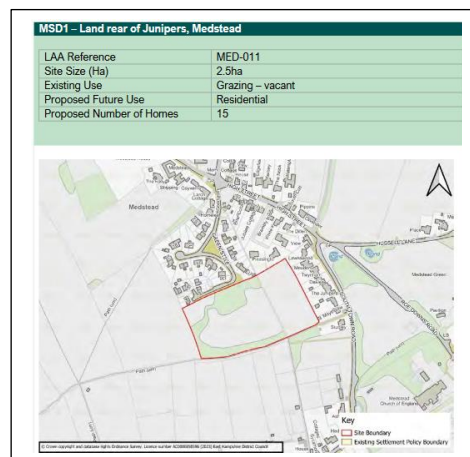
Medstead Village

Current Planning Applications and Proposed Allocations – Medstead



Location of outstanding housing permissions and proposed sites in Medstead

MSD1 Land rear of Junipers



Site Description

The site lies in close proximity to central parts of Medstead, to the west of residential development on South Town Road and to the south of other properties that are accessed from High Street and Green Stile. A public right of way runs along the site's southern boundary, with another right of way bisecting the site from north to south. Land to the south and west is generally in agricultural use, but to the south-east lies Medstead cemetery.

The site is largely greenfield pasture but includes areas that are well-vegetated, with substantial areas of mature trees and hedgerows that are particularly notable in the north, on its boundaries and following the course of the public right of way within the site. Land to the east of right of way has been allocated for residential development in the East Hampshire Local Plan: Housing and Employment Allocations (April 2016) but has not yet come forward for development. The land is relatively flat, sloping gently and falling away to the south, beyond the site's boundaries. Adjoining housing is a mix of detached and semi-detached house types, with houses and plots on South Town Road being larger than those on Green Stile. Plot layout and design is more consistent on South Town Road than on Green Stile.

List of constraints & opportunities

- Biodiversity: there are three individual tree protection orders on the northern and eastern site boundaries. Protected species may be present on the site, given the extent of mature vegetation.
 - Green infrastructure: mature field boundaries and trees are important characteristics of the site, providing a sense of containment and helping to integrate it with the wider landscape.
 - Flood risks: small parts of the site are susceptible to surface water flooding. These flood risk areas affect the south-east corner of the site.
 - Access: connection to the local road network could be achieved by a new access to Green Stile.
 - Access: potential to connect the site to the public rights of way network, enabling healthy & active lifestyles.
 - Residential amenity: due to the proximity of adjoining dwellings to the site's eastern boundary and the occasional lack of screening on this boundary, there is the potential for adverse impacts on the amenity of existing housing on South Town Road.
 - Agricultural land quality: the site and adjoining areas could be Grade 3 agricultural land, which is a finite resource.
 - Built heritage: no designated constraints to development.

Summary of Reasons for Inclusion

As an existing allocation for residential development, part of the site has previously been considered suitable for a small-scale development that respects the local character of Medstead village. A larger area that would provide more new homes is now being proposed.

The site scores above average within the Local Planning Authority's Accessibility Study.

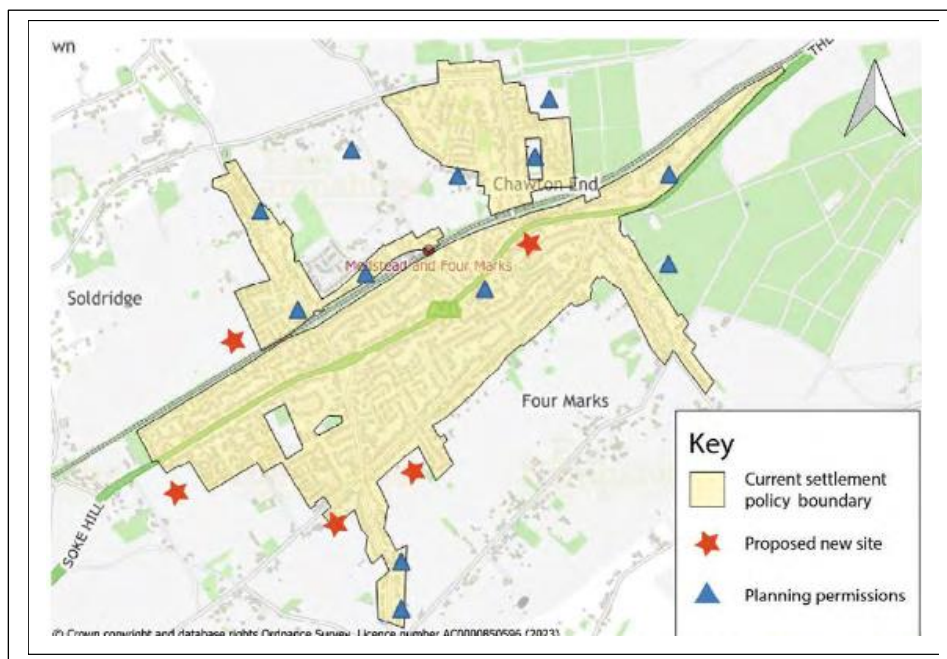
Connections to the public rights of way network could support healthy and active lifestyles for residents. Impacts on environmental constraints (biodiversity, green infrastructure, flood risks) could be avoided or mitigated by appropriate design and layout, for example by

leaving any valuable habitats free of development and by leaving a suitable buffer of open space or landscaping between buildings and mature green infrastructure. Augmenting green infrastructure on the site's eastern boundary could to³⁶ avoid adverse impacts on residential amenity. New vehicular access could be provided on the northern boundary by connecting to Green Stile. The dimensions of the site facilitate an east-west layout for development, to support passive design principles and the installation of solar panels for meeting the design requirements of the climate emergency.

Infrastructure Requirements

- **Education:** No specific requirements identified at this stage.
- **Health:** Developer contributions (e.g. as a s.106 contribution) may be required towards the extension of Watercross Medical, Mansfield Park Surgery and/or of Boundaries Surgery.
- **Access:** A vehicular connection to Green Stile and new walking and cycling infrastructure and connections would be necessary to support development.
- **On-site drainage:** Significant constraints have been indicated for infiltration sustainable drainage systems. Appropriate infrastructure will be required to mitigate flood risks.
- **Cumulative pressures of development on local infrastructure will be dealt with via CIL.**

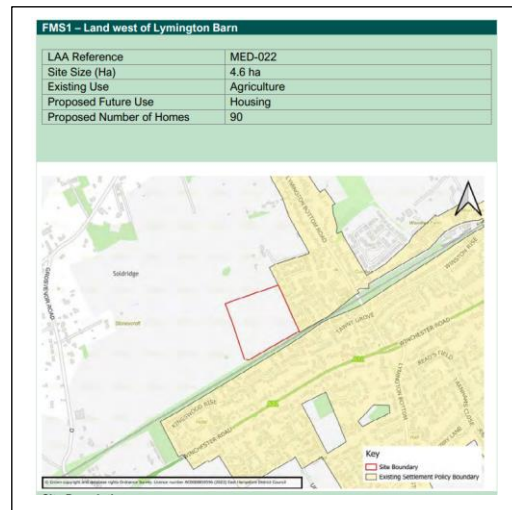
'South Medstead'



Location of outstanding housing permissions and proposed sites in Four Marks/ 'South Medstead'

³⁶ Direct quote from the DLP.

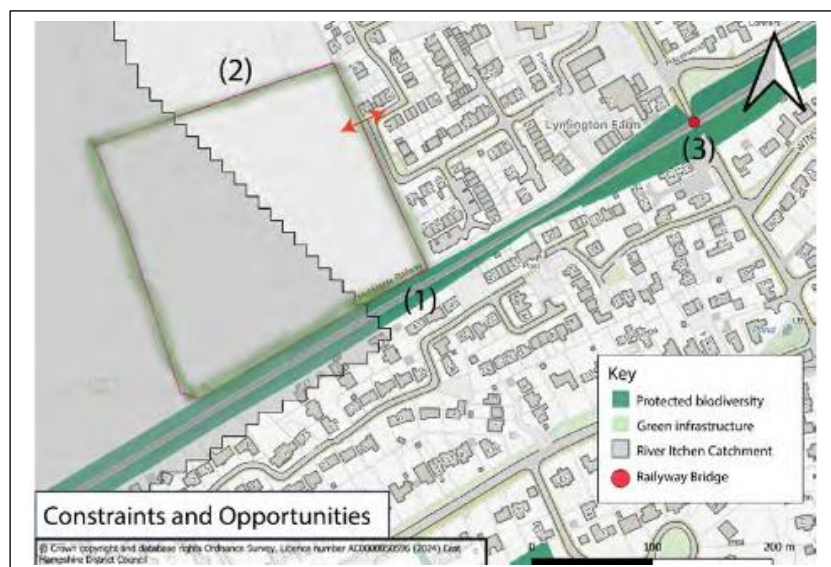
FMS 1 Land West of Lymington Barns



Site Description

The site is located to the west of recent residential development at Longbourn Way and to the north of the Watercress Line, a heritage railway line. Land to the west and north of the site is undeveloped greenfield pasture. There is a small range of facilities and services to the east of the site at Lymington Barn.

The site is undeveloped greenfield pasture with mature trees and hedgerows on its boundaries. There is no public access across the site and limited views into the site from the public realm to the east. The land is relatively flat, with the centre of the site forming part of a broad ridge within the wider landscape. It forms part of the rural environs of the settlement. Housing to the east is a mix of house types including detached, semi-detached and terraced houses, all of which are laid out in a grid of cul-de-sacs and through-loops. Plot sizes are small or very small in comparison to many parts of Four Marks/ 'South Medstead'.



List of constraints & opportunities

- Biodiversity (1): there are priority habitats adjoining the southern boundary associated with the mature green infrastructure of the embankments to the Watercress Line.

- *Water Quality: part of the site lies within the catchment of the River Itchen. Development would need to address nutrient neutrality.*
- *Green infrastructure (2): all boundaries of the site have varying amounts of mature trees and hedgerows, with the southern boundary being the most densely covered. These are important characteristics of the site, helping it to integrate with the wider rural landscape. The landscape contribution of green infrastructure within nearby urban areas is emphasised within the Local Planning Authority's Neighbour Character Study (2018).*
- *Access: connection to the local road network could be achieved through recent housing development to the east. There is potential for adverse impacts on congestion and road safety associated with Longbourn Way, adjoining roads and the railway bridge.*
- *Noise: there is the potential for adverse impacts on residential amenity from locating new housing in close proximity to the railway line.*
- *Residential amenity: due to the proximity of adjoining dwellings to the east, there is the potential for adverse impacts on the amenity of existing housing.*
- *Agricultural land quality: the site and adjoining areas could be Grade 3 agricultural land, which is a finite resource.*

Summary of Reasons for Inclusion

The site is well-located for purposes of accessing local facilities and services off Lymington Bottom Road and Longbourn Way, including a GP surgery. The site scores above average in the Local Planning Authority's Accessibility Study. Impacts on environment constraints (biodiversity, green infrastructure) could be avoided or mitigated by appropriate design and layout. Maintaining and augmenting green infrastructure on the southern boundary, whilst setting back development in this area, could help to achieve a net gain in biodiversity and reduce noise-related amenity concerns. More generally, strengthening green infrastructure across the site and on its boundaries could enhance the site's sense of containment, also enabling development to integrate with the wider rural landscape and to reflect some of the key characteristics of the local area. New vehicular access could be provided by extending roads that were built to serve the housing development to the east. Road safety and congestion concerns are likely to require off-site improvements to the road network (these are currently the focus of work between the site promoter as an applicant for planning permission and the highways authority). The dimensions of the site facilitate a predominantly east-west layout for development, which would support passive design principles and the installation of solar panels for meeting the design requirements associated with the climate emergency.

Infrastructure Requirements

- *Education: No specific requirements identified at this stage.*
- *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.*
- *Access: A vehicular access point onto Longbourn Way, further highway and junction improvements along Longbourn Way and Lymington Bottom Road, and new pedestrian and cycling infrastructure and connections would be necessary to support*

development. The exact nature of these improvements is currently the focus of discussions in support of a planning application for the site.

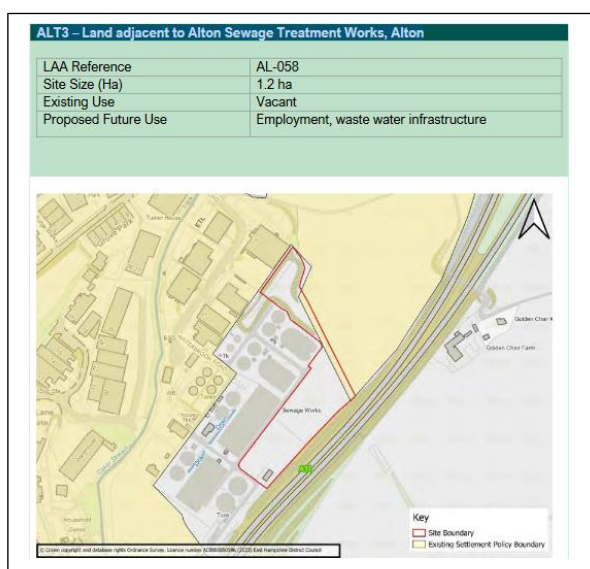
- On-site drainage: Significant constraints have been indicated for infiltration sustainable drainage systems. Appropriate infrastructure will be required to mitigate flood risks.
- Cumulative pressures of development on local infrastructure will be dealt with via CIL.

Infrastructure Requirements

- Education: No specific requirements identified at this stage.
- 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.
- Access: A vehicular access point onto Longbourn Way, further highway and junction improvements along Longbourn Way and Lymington Bottom Road, and new pedestrian and cycling infrastructure and connections would be necessary to support development. The exact nature of these improvements is currently the focus of discussions in support of a planning application for the site.
- On-site drainage: Significant constraints have been indicated for infiltration sustainable drainage systems. Appropriate infrastructure will be required to mitigate flood risks.
- Cumulative pressures of development on local infrastructure will be dealt with via CIL.

Allocation of Other Sites

On reviewing the list of Allocated sites, the NPSG would wish to express our concern regarding the inclusion of ALT3 – Land adjacent to Alton Sewage Treatment Works, Alton.



Site Description

The site adjoins the Alton Sewage Treatment Works to the west, an industrial unit to the northwest and the A31 immediately to the south. Land at Lynch Hill, which is the existing

allocation EMP1 of the Housing and Employment Allocations Plan (adopted 2016) (and which is also a proposed site in this Draft Local Plan), adjoins the site to the north-east.

There is no road frontage to the site, but it is currently connected to Waterbrook Road through road infrastructure associated with the treatment works. The land is generally flat and undeveloped, with trees and hedgerows on boundaries on the edges and within the site.

List of constraints & opportunities

- *Green infrastructure: mature trees and hedgerows within/on the edge of the site are important characteristics, providing visual containment from the A31 and local habitats. Landscape: there is the potential for adverse landscape and visual impacts depending on the heights and massings of new structures.*
- *Odour and noise: noise from the A31 and odour from the sewage treatment works mean that this site would be unsuitable for more sensitive uses.*
- *Adjoining uses (existing and proposed): employment uses adjoin the site to the north- west and permitted employment development lies to the north-east. There is potential to connect parts of this site to these areas to accommodate expansion of existing/new facilities. Alternatively, the whole site could accommodate an expansion to the treatment works, if needed to support new development in the wider area.*
- *Access: vehicular access could be provided through existing or permitted employment- related development, or through existing on-site road infrastructure at the sewage treatment works.*
- *Flood risk: there are no identified flood risks for this site, although the risk of groundwater flooding exists throughout Alton.*
- *Built heritage: no designated constraints to development.*

Summary of Reasons for Inclusion

The site lies within an existing employment area and therefore offers potential to accommodate the expansion of adjoining employment or waste water treatment uses. At this stage in the plan-making process, its potential is being identified as an opportunity for further exploration in conjunction with landowners and statutory consultees. Environmental constraints (green infrastructure, landscape) could be avoided or mitigated through the appropriate layout and design of new development, with existing trees and hedgerows being maintained and enhanced where necessary. Access would need to be considered in relation to the proposed use, which would also need to take account of the odour and noise constraints associated with the site. The site is free of flood risks, being located in flood zone 1 and without identified surface water flood risks.

Infrastructure Requirements

- *Access: a new vehicular access may be required, depending on emerging proposals for the site.*

13 OTHER DOCUMENTS

The other documents mentioned in the Draft Local Plan Consultation have also been reviewed:

Housing Background Paper³⁷	13. 1
Gaps Between Settlements Background Paper³⁸	13. 2
Interim Settlement Policy Boundary Review Background Paper³⁹	13. 3
Meeting the Accommodation Needs of Gypsies, Travellers and Travelling Showpeople 2024 Background Paper⁴⁰	13. 4
Io⁴¹	13. 5
Including:	
<ul style="list-style-type: none"> • <i>East Hampshire Living Locally Accessibility Study and Decide & Provide Methodology (Ridge & Partners Report 1)⁴², and</i> • <i>East Hampshire Living Locally Accessibility Study and Decide & Provide Methodology (Ridge & Partners Report 2)⁴³</i> 	
Transport Background Paper⁴⁴	13. 6
EHDC Local Cycle and Walking Infrastructure Plan Technical Report⁴⁵	13.7
Policy Maps⁴⁶	13.8

³⁷ EHDC Portal: EHDC DLP Supporting Papers: **Housing Background Paper**

<https://www.easthants.gov.uk/media/8737/download?inline>

³⁸ EHDC Portal: EHDC DLP Supporting Papers: **Gaps Between Settlements Background Paper**

<https://www.easthants.gov.uk/media/8736/download?inline>

³⁹ EHDC Portal: EHDC DLP Supporting Papers: **Interim Settlement Policy Boundary Review Background Paper**

<https://www.easthants.gov.uk/sites/default/files/2024-01/Interim%20settlement%20policy%20boundary%20review.pdf>

⁴⁰ EHDC Portal: EHDC DLP Supporting Papers: **Meeting the Accommodation Needs of Gypsies, Travellers and Travelling Showpeople 2024 Background Paper**

<https://www.easthants.gov.uk/media/8738/download?inline>

⁴¹ EHDC Portal: EHDC DLP Supporting Papers: **Revised Settlement Hierarchy Background Paper**

<https://www.easthants.gov.uk/sites/default/files/2024-01/Revised%20settlement%20hierarchy.pdf>

⁴² EHDC Portal: EHDC DLP Supporting Papers: **East Hampshire Living Locally Accessibility Study and Decide & Provide Methodology**

<https://www.easthants.gov.uk/sites/default/files/2024-01/D%26P%20Transport%20assessment%20methodology.pdf>

⁴³ EHDC Portal: EHDC DLP Supporting Papers: **East Hampshire Living Locally Accessibility Study and Decide & Provide Methodology (Ridge & Partners Report 2**

<https://www.easthants.gov.uk/sites/default/files/2024-01/D%26P%20Transport%20assessment%20methodology.pdf>

⁴⁴ EHDC Portal: EHDC DLP Supporting Papers: **Transport Background Paper**

<https://www.easthants.gov.uk/media/8773/download?inline>

⁴⁵ EHDC Portal: EHDC DLP Supporting Papers: **EHDC Local Cycle and Walking Infrastructure Plan Technical Report**

<https://www.easthants.gov.uk/media/6035/download?inline>

⁴⁶ EHDC Portal: EHDC DLP Supporting Papers: **Policy Maps**

<https://www.easthants.gov.uk/media/8741/download?inline>

13.1 Housing Background Paper January 2024

Quantum of Dwellings

NSSG believe that EHDC has overstated the housing need for the District outside the SDNP.

In the Tables below demonstrate the logic that has been used to reach this conclusion.

The target for the minimum number of houses to be included in the EHDC Local Plan to 2040				
1. The Standard Method				
The starting position is the Standard Method calculation for the whole of the EHDC district.				
			Per annum	2021-2040
Step 1 - Setting the baseline (national household growth projections (2014-based household projections in England, table 406 unitary authorities and districts in England))			375	7,125
Step 2 - An adjustment to take account of affordability	0.541333	54%	203	3,857
Total			578	10,982
The Plan assumes that the LPA area takes 83% of this total (82.7%)			478	9,082
Policy S1 states 9,082 dwellings minimum is 464 (so added the 14 from SDNP), para 9.11				

2.1 The effect of the SDNP on area outside the SDP			
2.1.1 What percentage		MINUS	Difference
The current Plan assumes that the LPA area takes 83% of the total			
If the number was pro rata to population (i.e. ~72% for the LPA) it would be 7, 905 Buffer: Built in due to SDNP. A calculation based on land area would increase the buffer to 4,360	7,905	-62	-1.177
2.1.2 Allocation within the SDNP			
Previously, the assumption has been that the SDNP would take 114 homes pa. This Plan assumes only 100 homes pa. 14 homes over 19 years is a buffer of 266			
Buffer: no evidence base to change from ICENI report of Sep 2023. This is already included in the 478 figure above		14	266

2.2 The Affordability Ratio			
2.2.1. Fundamental flaw			
There is no evidence that the over provision of 3,857 houses meets the objective of the AR i.e. to reduce house prices. The AR leads to 3857 homes being provided to those migrating into the District			
Major buffer: it's part of the Standard Method, but is still a huge amount, but not part of the calculation.			
2.2.2 Work-place based calculation			
The AR is based on the salaries of where you work. With this level of migration (and no provision for employment in the Plan) it is likely that these homes will be filled with people who work outside the District. The AR should therefore be residency based. Residency based AR is 12.18 which uplifts the AR by 52%.			
Minor buffer: but still more than the FM/SM allocation			
Reduction for uplift for AR 52%		-11	- 214
2.2.3 The SDNP effect			
House prices are higher in the SDNP area. The AR for the LPA is 12.24% vs 12.7% for the District Uplift =51%		- 8	- 150
Minor buffer			

3. The Buffer		
On top of all the above, EHDC have added a 'buffer'		
Buffer: there is no evidence base for this. "9.21 In the context of the need for flexibility and addressing the potential unmet needs of the wider South Hampshire sub-region, the Local Plan allocates sites that could deliver more than the 2,857 new homes requirement listed above".	-34	-643
	DLP	NPSG
Actual housing need	9,082	7,164
existing planning permission granted in Mar 2023: 3,965	-3,965	-3,965
Section 3.25 completions April 2021 to March 2023: 940	-940	-940
Windfalls expected: 1,320	-1,320	-1,320
Total to be built in this plan period	2,857	939
Declared number of dwellings required declared in the Draft Local Plan	3,500	
Conclusion, EHDC are allocating sites for more than 5 times as many sites as are needed.		

Thus, the NPSG believe that the EHDC has overstated the total figure of required dwellings by 643 units.

13.2 Gaps between Settlements Background Paper, January 2024

EHDC have stated that gaps between settlements are a planning tool to prevent coalescence of settlements and maintain their separate identity.

This support for maintaining settlement character and identity has been reflected in previous Local Plan 'Gaps between Settlements' policies which seek to prevent settlement coalescence between urban areas by maintaining a clear visual and physical break in the built environment.

The principle of a gap policy is well established in development plans in East Hampshire, dating back to the South and Mid-Hampshire Structure Plans (1989/89). They were carried forward into the Hampshire Structure Plan (1994) and the Hampshire Structure Plan 1996-2011 (Review), as well as specific Local Plans within East Hampshire.

The new Local Plan has provided an opportunity to identify precise boundaries for the gaps that fall within the Local Plan Area. This background paper sets out the methodology and criteria to identify these boundaries, with precise boundaries shown on the associated Policies Maps.

In addition, it establishes a baseline methodology upon which future revisions or consideration to new gaps can be undertaken, i.e. through subsequent Local Plans, Development Plan Documents and Neighbourhood Plans.

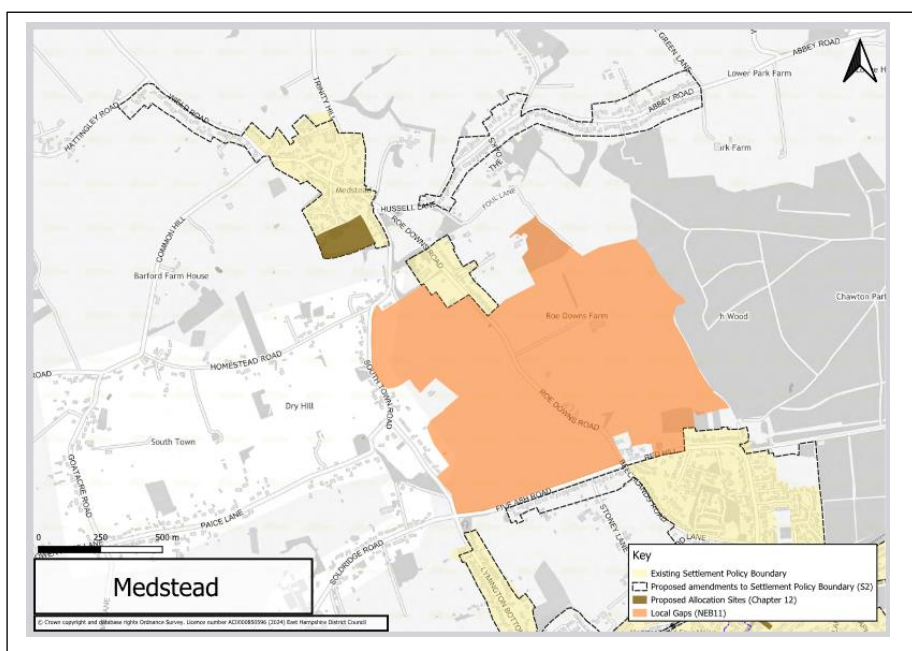


Fig Medstead Policy Map Showing the local Gap

The NPSG commends the expansion of the Medstead & Four Marks Neighbourhood Plan Local Gap from one field to cover the area from South Town Road to Chawton Park Woods, and Five Ash Road to Medstead Bowl Club and Foul Lane - preventing the joining of the Settlements. The NPSG recommends the wording is expanded to include any gaps defined in Neighbourhood Development Plans.

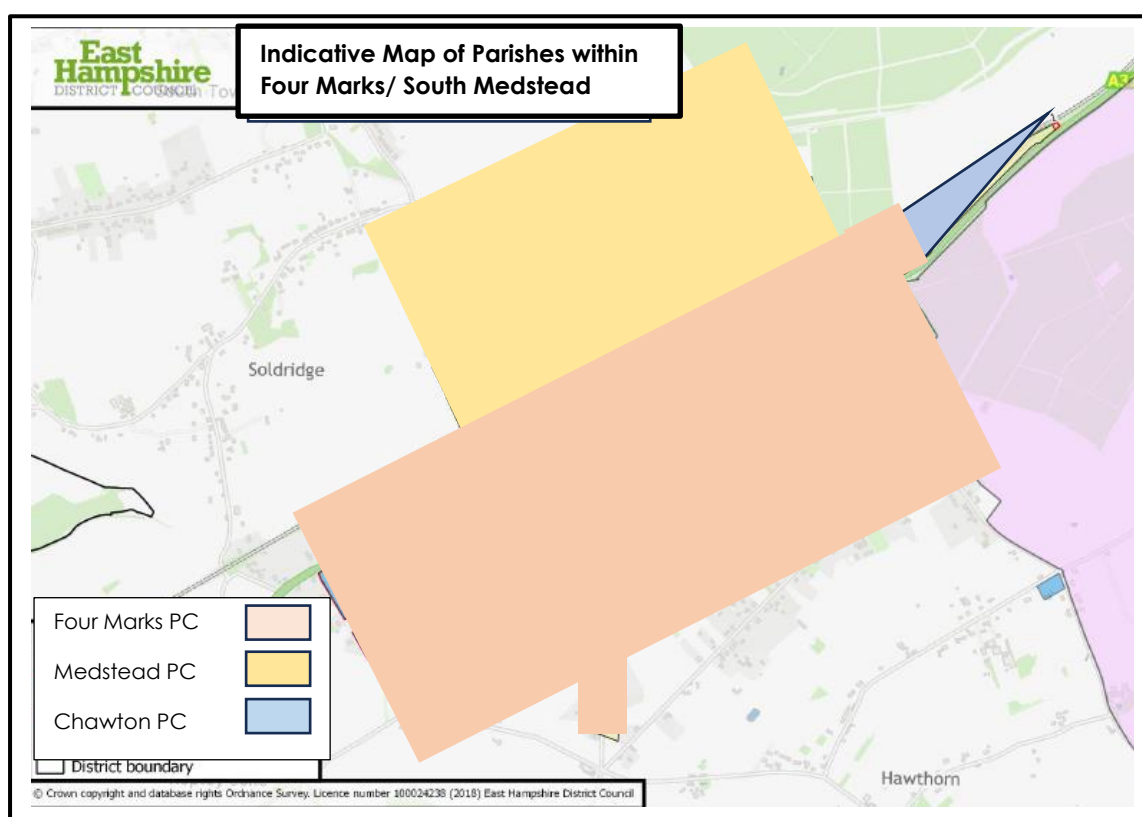
13.3 Interim Settlement Policy Boundary Review Background Paper, January 2024

This document is a review of the EHDC *Interim Settlement Policy Boundary Review Background Paper, January 2024*, published as a support document to the EHDC Draft Local Plan 2021 to 2040, Regulation 18 Consultation. It supersedes the previous 2019 iteration.

This paper reviews the document in relation to the village of Medstead and the settlement of Four Marks/ 'South Medstead', including the area in the Civil Parish of Chawton located around The Shrave, including Oakhurst Drive, Woodlark Place, Sundew Place and Hunters Drive.

There are three Parish Councils that have responsibility for Four Marks/ 'South Medstead Settlement:

- Chawton (CPC)
- Four Marks (FMPC) and
- Medstead (MPC)



The original settlement policy boundaries had been set by EHDC, and modified in the Local Plan 2013 – 2028, with the Medstead and Four Marks Neighbourhood Plan 2013 -2028 making local adjustments to the settlements within the plan area to prevent inappropriate back garden developments.

The Local Planning Authority produced the *Interim Settlement Policy Boundary Review Background Paper* for consultation in 2019, using the responses to produce the current *Interim Settlement Policy Boundary Review Background Paper, January 2024*.

Key clauses from the SPB EHDC *Interim Settlement Policy Boundary Review Background Paper*, January 2024 document will be found in Appendix 1.

The proposed changes to the 'made' M&FMNP SPB as recommended in the 2019 *Interim Settlement Policy Boundary Review Background Paper Consultation* will be found in Appendix 2

The comments from respondents to the 2019 Consultation, together with the LPA responding comments and proposed actions will be found in Appendix 3.

The EHDC maps of the proposed new SPB for the area, and the key and explanation of the changes is to be found in Appendix 4.

The Medstead village M&FMNP Policy Map Insert 1, covering the Medstead cricket field and football pitch and play areas is to be found Appendix 5.

The NPSG would like to point out that EHDC has confused Lymington Bottom, Four Marks, with Lymington Bottom Road, Medstead

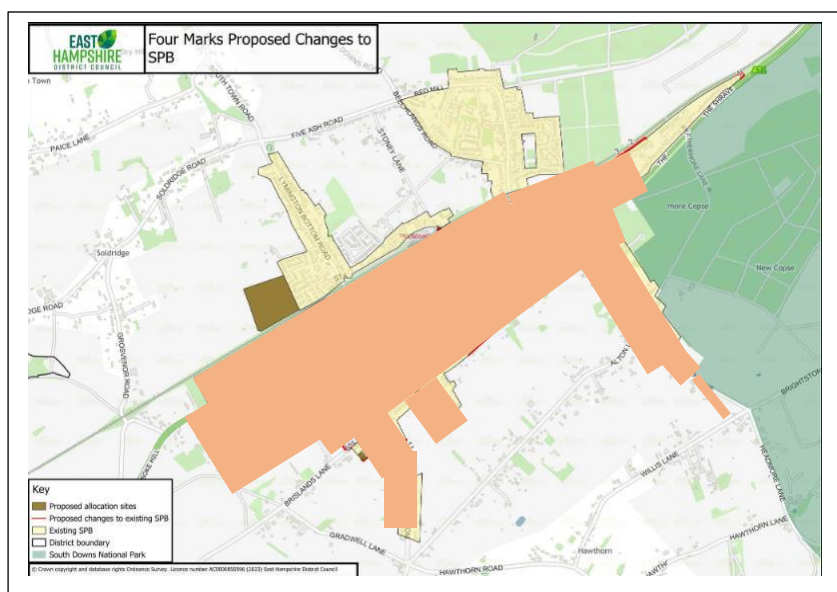
Overview

It has been apparent when reading the 2019 and 2024 EHDC *Interim Settlement Policy Boundary Review Background Papers*, that a lot of detailed work and consideration has taken place using input from the EHDC Planning Team.

However, although most of the conclusions within the papers are acceptable, there are some that raise concerns with those within the Medstead Four Marks and Chawton area that have that 'specialist local knowledge' and a response to this document gives them an opportunity to make comment.

The NPSG, together with the Parish Councillors, request a meeting with EHDC Officers to discuss the proposals in the *Interim Settlement Policy Boundary Review Background Paper, January 2024*, and determine a mutually acceptable SPBs that protect the areas of concern within the Parishes, as part of the DLP Reg 19 Process.

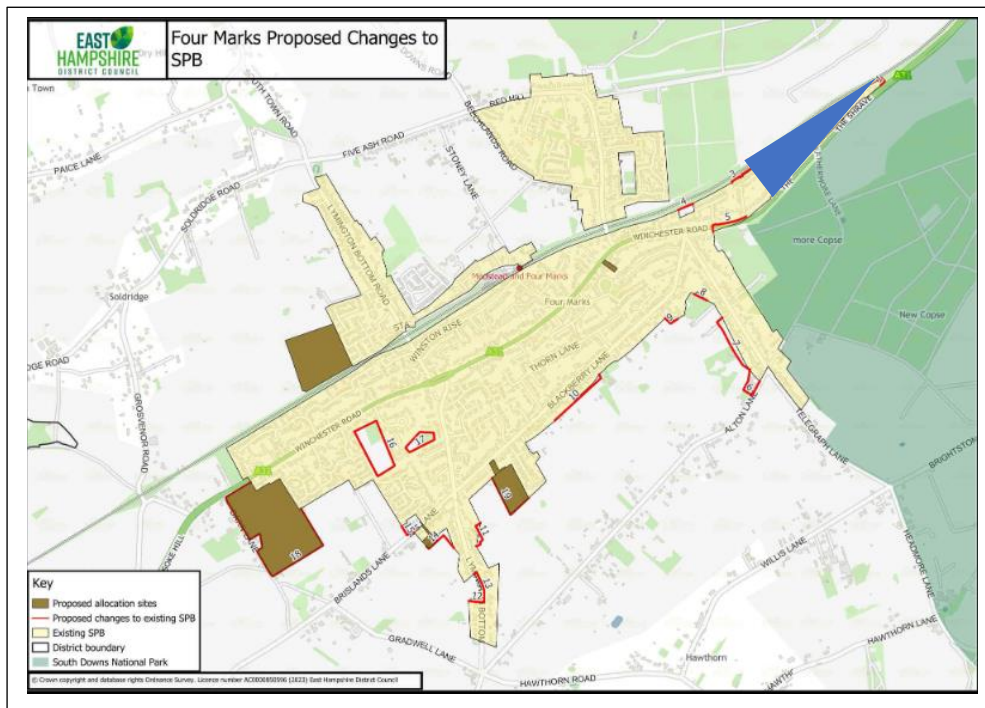
Chawton



Four Marks

The proposed EHDC changes to the SPB are:

- Inclusion of the garden of Lonely Place on The Shrave (1)
- Inclusion of gardens rear of 2-9 Woodlark Place (2)



Four Marks

The NPSG would like to point out that EHDC has confused Lymington Bottom, Four Marks, with Lymington Bottom Road, Four Marks & Medstead

The proposed EHDC changes to the SPB are:

- Move SPB to the north to include the gardens rear of properties on A31, Foxhill, Forest Way, Bramley House. (4)
- Move SPB to the north to include the gardens rear of 6-10 Oakhurst Drive. (3)
- Move SPB to the northeast of The Shrave/ Telegraph Lane junction (5)
- Inclusion of dwellings on north side of Alton Lane at Telegraph Lane junction - Matchbox House, Oak Park and Oak Lodge (6)
- Extend SPB to West to include gardens rear of properties on Telegraph Lane west side Telegraph Lane (7)
- Extend SPB to West to include gardens rear of 24-28 Telegraph Lane (8)
- Extend SPB to South to include garden of 1 Wild Wood. (9)
- Extend SPB to South to include gardens rear of Blackberry Lane (10)
- Extend SPB to East to include Land to rear of Maytrees, Lymington Bottom Road (11)
- Extend SPB to roadside, west of Lymington Bottom (12 &13)
- Extend SPB to west and south to include gardens rear of Lymington Bottom Road and Brislands Lane.(14)

- Inclusion of Greenways, The Oaks, Green Tiles and Wisteria, north side Brislands Lane (15).
- Land behind 131 Winchester Road (16),
- Land south of 4 and 5 Gloucester Close (17).
- Inclusion of Land South of Winchester Road (Barn Lane) Allocated site (18)
- Inclusion of land south of 97 to 103 Blackberry Lane, by Bernard Avenue Allocated site (19)

Four Marks Parish Council has concerns regarding the removal of the SPB around Storey's Piece has long been considered an important area by Four Marks and its District Councillors before 1996. For this reason, the M&FMNP created a SPB around this area.

It has the designation as an area of informal Public Open Space and has been protected for a number of years through efforts from local residents and the Parish Council.

Four Marks Parish Council objects to any changes to the SPB that would include this area and to any reclassification. Within the *Interim Settlement Policy Boundary Review Background Paper 2024*, it is clearly stated that Settlement Policy boundaries will exclude Open Spaces and would like to discuss with EHDC any additional measure to protect our open space.

Four Marks Parish Council also has concerns to the proposal to remove the current SPB, to include land behind 131 Winchester Road (16), as the inclusion is contrary to the new DLP Policy NDE 2, within the Chapter 6 Safeguarding our Natural and Built Environment, as the site include SINCS.

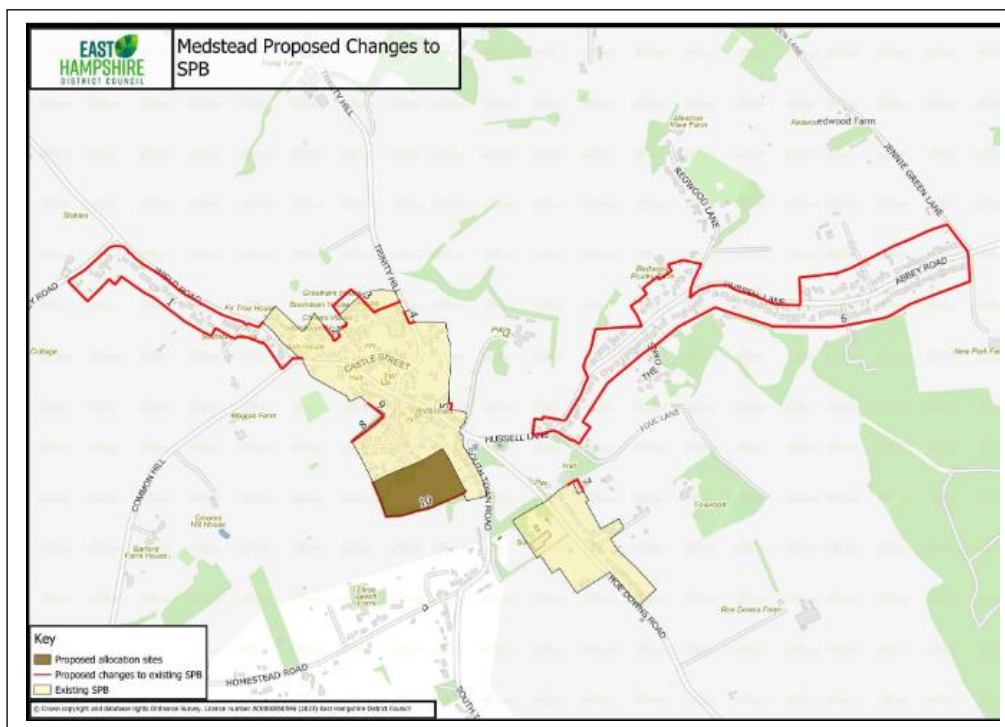
Four Marks Parish Council considers that the inclusion of this area within the Settlement Policy Boundary is unacceptable due to its status as a SINC, which also includes the perimeter hedgerows. It also notes that there are several TPO's in this area. Even if the border of the area was retained, there would still be unacceptable damage to wildlife and biodiversity through the disruption of the perimeter.

Indeed, the change to the existing SPB is contrary to the new Chapter 05: *Safeguarding our Natural and Built Environment : Policy NBE2: Biodiversity, geodiversity and nature conservation'* and therefore must not be implemented.

Four Marks Parish Council also notes that, if the site was accepted as a development site, the current direct access onto the A31 would be too narrow to allow safe passage and so alternative access would need to be cut through the SINC, in one direction or another, again contrary to proposed Policy NBE2.

Medstead

Medstead Village



In its response to the 2019 Draft SPB Review Consultation, Medstead Parish Council requested EHDC to remove the houses on Hattingley Road from the proposed Medstead Village SPB change 1. EHDC accepted the change, but had not removed it in this later version of the background paper.

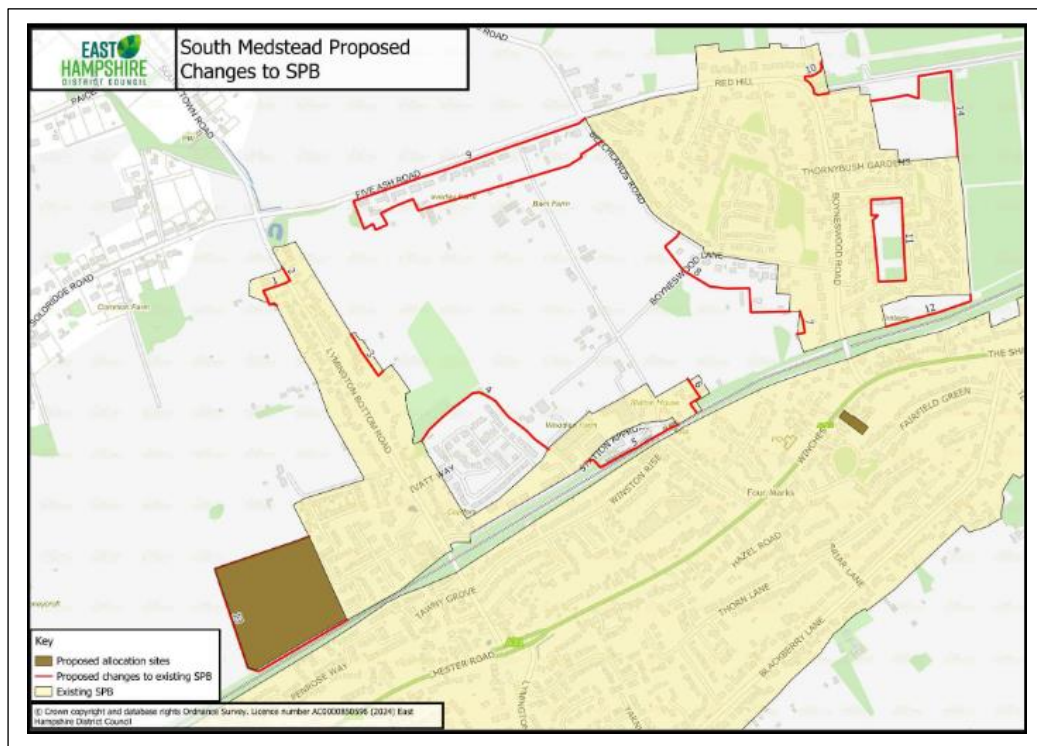
Medstead Parish Council had previously requested that the dwellings Shadingley House, Kelmscott, Braida Garth, Little Metcombe are removed, to place them outside this change to the SPB.

The proposed EHDC changes to the SPB are:

- Inclusion of south side Wield Road from Common Hill to Hattingley Road, (excluding Shadingley House, Kelmscott, Braida Garth, Little Metcombe) (1);
- Removal of area to the west of Cedar Heights (2),
- Inclusion of rear gardens to the north of Greatham House, Northington House and Bramdean (3)
- Adjustment of SPB to west side of Trinity Hill, from the north curtilage of the Rectory, northwards and the removal of the 'Flower Meadow' as green space (4),
- Adjustment of SPB at Watersplash and South Cottage, High Street (5) Inclusion of Hussell lane and Abbey Road, both sides to Jenny Green Lane, including Roscommon, Foul Lane (6)
- Adjustment of SPB, rear of Stevenstone. (7)

- Adjustment to SPB, western side Green Stile, to bring back to the curtilage (8) and
- Adjustment to SPB, behind Little Gayverne and Larch Cottage, Wield Road, to bring back to the curtilage (9)
- Inclusion Land rear of Junipers Allocated site (10)

South Medstead



The proposed EHDC changes to the SPB are:

- Removal of the Telephone exchange from the SPB (1&2; in 2019 paper was numbered 19 &20).
- Inclusion of gardens rear of 62-70 Lymington Bottom Road(3; in 2019 paper was numbered 21)
- Inclusion of the Land east of 20-38 Lymington Bottom Road (CALA Homes site) built out since the adoption of the M&FMNP (4; in 2019 paper was numbered 22).
- Inclusion of the Vintage Bus Garage on Station Approach.(5; in 2019 paper was numbered 23).
- Exclusion of the eastern part of Stonebridge (6; in 2019 paper was numbered 24).
- Inclusion of land southwest of Boyneswood Lane (7&8, in 2019 paper they were numbered 25 & 26).
- Extension of the SPB west along Five Ash Road (9 – was 27).
- Exclusion of the grassed area before the entrance to the Chawton Park Woods car park (10; in 2019 paper was numbered 28).
- Inclusion of the whole area including the 9 dwellings recently approved by EHDC (11; in 2019 paper was numbered – was 29).

- Inclusion of gardens of Woodlea and Timbers (12; in 2019 paper was numbered 30)
- Inclusion of the proposed site to the west of Lymington Barns, as an Allocated Site. (13)
- Inclusion of the Friars Oak II site, recently approved for 45 dwellings by EHDC (14).

Change to Principle 4

In the 2019 consultation MPC also noted “*Principle 4 has not been applied to the three extensions to the SPB at Five Ash Road; Wield Road and Hattingley Road; and Hussell Lane and Abbey Road.*” to which EHDC have responded “Comments noted. Principle 4 will be amended for clarity.”

Principle 4

Settlement boundaries do not need to be continuous.

3.14 It may be appropriate given the nature and form of a settlement to define two or more separate elements. These detached areas of a settlement may have boundaries drawn around them, where they:

- Have a density of 30 dwellings per hectare or more (after deduction of any long narrow rear gardens). Clusters of low density villa style housing or of detached houses with sizeable side or front gardens will not be given settlement boundaries
- Comprise a continuous block of curtilages, of buildings which are in close proximity to one another, without large residential plots, landscaping or other open space breaking up the area (though they may be separated by roads)
- Include at least twenty dwellings, and
- Are situated within 200m of the main part of the settlement, are visually related to the main part of the settlement and do not have any identity as a separate settlement or hamlet.

3.15 Where boundaries are drawn around detached parts of settlements, this will not have any implications for land lying outside the boundary between the main part of the settlement and the detached part.

Principle 4 now reads:

Principle 4

Settlement boundaries do not need to be continuous.

4.15 *It may be appropriate given the nature and form of a settlement to define two or more separate elements. These detached areas of a settlement may have boundaries drawn around them, where they:*

- *Comprise a continuous block of curtilages, of buildings which are in close proximity to one another, without large residential plots, landscaping or other open space breaking up the area (though they may be separated by roads)*
- *Include at least twenty dwellings, and*
- *Are situated within 200m of the existing Settlement Policy Boundary, are visually related to the main part of the settlement and do not have any identity as a separate settlement or hamlet.*

4.16 *Where boundaries are drawn around detached parts of settlements, this will not have any implications for land lying outside the boundary between the main part of the settlement and the detached part.*

It is noted that the first bullet point has been removed in the 2024 version of the document

13.4 Meeting the Accommodation Needs of Gypsies, Travellers and Travelling Showpeople 2024 Background Paper, January 2024

EHDC must accommodate the needs of Meeting the Accommodation Needs of Gypsies, Travellers and Travelling Showpeople within its local plan. There is a well-established Traveller¹ community in East Hampshire district. The community lives in a variety of accommodation; including bricks and mortar homes, mobile homes, and touring caravans.

It recognises the value of closer working relations with the local Traveller community. Often a socially excluded group, the community has a significantly lower life expectancy and lower educational attainment than the settled community. The Council recognises the contribution that decent permanent culturally suitable accommodation can have to the overall wellbeing of Traveller families.

The background paper provides information on how the Council is working towards achieving this for the planning authority area (that part of the district outside the South Downs National Park), structured by the key steps so far taken.

The findings of the GTAA 2020 assessment are:

Table 1 The need for Gypsy and Traveller pitches in East Hampshire (meeting the planning definition) accounting for unknown households

Years	2020-25	2025-30	2030-35	2035-36	Total
No. of pitches	49	7	7	3	66

Table 2 The need for Travelling Showpeople plots in East Hampshire (meeting the planning definition) accounting for unknowns

Years	2020-25	2025-30	2030-35	2035-36	Total
No. of pitches	36	4	5	2	47

This is a significant need, much higher than that identified in the GTAA 2017.

Proposed Allocations

Based on the situation described, the draft Local Plan proposes to allocate:

LAA site ref	Local Plan Site Ref	Address	Parish	Type of accommodation	Potential Number of pitches/plots
LAA/FM-022	FMS5	Fordlands, Brislands Lane, Four Marks	Four Marks	Traveller	2
LAA/HEA-011	HED1	Land at Middle Common, Headley Down	Headley	Travelling Showpeople	6
BIN-011	ALT8	Land at Neatham Manor Farm, Alton	Binstead	Travelling Showpeople	6

There are sites requiring further assessment

LAA site ref	Address	Parish	Type of accommodation
LAA/KIN-009	Land east of 14 Dean Field	Kingsley	Traveller
LAA/HD-026	Trickett, Fairfield, Roads Hill	Hordean	Travelling Showpeople

Allocated Site In Medstead and Four Marks

Location: Fordlands, Brislands Lane, Four Marks LAA site: FM-022 Parish: Four Marks



Accommodation: 1 Traveller pitch

Key constraints: Partly within the settlement policy boundary, partly in the countryside

Commentary: Site was confirmed as available for additional Traveller pitches in 2020. The site is mostly within the settlement policy boundary area, and land at rear of site that is within countryside has a defined boundary that aligns with landownership.

Outcome: Capacity for 2 additional Traveller pitches. Deliverable.

13.5 Revised Settlement Hierarchy Background Paper, 2024

Introduction

Under the previous EHDC *Local Plan 2013 to 2028 (JCS)*, Four Marks/ 'South Medstead' was determined as a 'Small Local Service Centre'; and Medstead village as an 'Other settlements with a settlement policy boundary', although this is not acknowledged in the Report's Appendix A.

This Hierarchy was revised in the 2019 paper, with Medstead village moved to be a Level 4 *Settlement with a Small Number of Services*.

The *Settlement Hierarchy Background Paper, 2022/3* which placed Four Marks/ 'South Medstead' as a Tier 2 settlement; and Medstead Village as a Tier 3 settlement.

The EHDC Planning Policy Committee meeting on 6th July 2021, received a supporting paper prepared by EHDC Officers *East Hampshire District Local Plan: Spatial Strategy Preferred Option*⁴⁷ was main agenda item of the meeting. Within Under Section 6. *Options* of the document:

Point 6.6 notes:

- *Option 4: Four Marks and South Medstead offers fewer local services and facilities than (e.g.) Alton, with no access to the mainline railway network. A review of transport data has highlighted that this area is relatively car dependent, raising concerns that an option involving significant new development at South Medstead would be less responsive to the climate emergency. The Council's SA Scoping Report has identified that transport emissions are a significant contributor to greenhouse gas emissions in East Hampshire.*

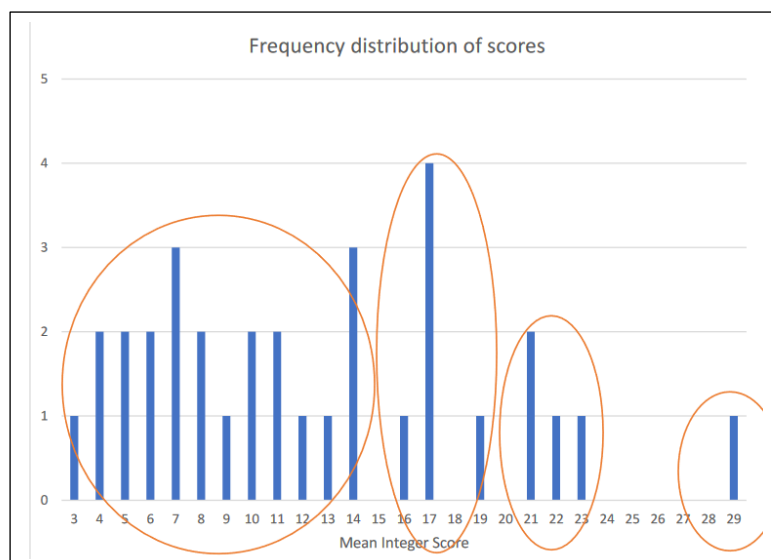
This status was accepted by the resolution of the meeting accepting Option 2 .

When reviewing the *Revised Settlement Hierarchy Background Paper, 2024*, the NPSG have grave concerns regarding the final logic on setting the Settlement Hierarchy using a subjective judgement that the local population is a common factor in supporting the 'viability' of a settlement. The NPSG considers this philosophy flawed, and it does not produce a true Settlement Hierarchy for the District outside the National Park.

Four Marks/ South Medstead

The NPSG fundamentally rejects the EHDC decision to place Four Marks/'South Medstead' with other as a Tier 3 Settlement. The detailed and painstaking research by Ridge and Partners places the settlement in Tier 4 in Figure 4:

⁴⁷ EHDC Portal Planning Policy Committee 5th July 2021, Reports Pack
<https://easthants.moderngov.co.uk/documents/g3829/Public%20reports%20pack%2006th-Jul-2021%2018.00%20Planning%20Policy%20Committee.pdf?T=10>



It can be clearly seen that Four Marks/'South Medstead, with a score of 13.92, which is almost identical to the adjacent village of Ropley(13.87), sits comfortably with the Tier 4 grouping, as the lowest score in Tier 3 is for Clanfield (16.85). This Hierarchy has scientifically determined.

By deciding on a philosophy by randomly considering the local population, EHDC has subjectively moved Four Marks/'South Medstead' from Tier 4 into Tier 3.

However, the population of Four Marks/ 'South Medstead' has not grown 'organically', it has been 'forced'. Since 2013, despite the proposed increase of 175 houses, to 2028 to 31st March 2023, 571 dwellings have been built in the settlement, with a further 75 with planning permission granted; and another 60 in the balance pending the determination of an Appeal against the refusal of the Planning Application for 46 Lymington Bottom, Four Marks.⁴⁸.

If the average occupancy is 2.4 persons a dwelling the estimated increase in population between 1st April 2013 to 31st March 2023 was 27.54%. The expected increase to 2028 was expected to be 8.44%, but to date it is 19.1% above the proposed with another 7 years of the LPA Local Plan still to run.

Four Marks/South Medstead, as evidenced by the linear way the settlement has developed, is dependent on the A31. There is significant passing trade with the facilities on Winchester road around Oak Green including the convenience stores, the BP Service Station, the baker, barber, fish and chip shop, the Indian Restaurant, the Chinese Take Away, and the off licence. The only establishments to have failed were the bank, the post office, the cycle shop and the Windmill Public house, whose demise was hastened by the opening of the M3 motorway.

⁴⁸ EHDC Portal Planning Application 56082/004 | Outline planning application for demolition of 46 Lymington Bottom, Four Marks and the erection of up to 60 dwellings with vehicular access point, public open space, landscaping and sustainable drainage systems (SuDS). All matters reserved except for means of access (additional information and revised Travel Plan received 21/08/23) | Mount Royal, 46 Lymington Bottom, Four Marks, Alton, GU34 5AH https://planningpublicaccess.easthants.gov.uk/online-applications/applicationDetails.do?keyVal= EHANT_DCAPR_254025&activeTab=summary

The A31 is a major route running from Guildford to Bere Regis. In the EHDC District, the only villages it passes through are Ropley(40mph) and Four Marks (30mph). The A31 in Four Marks is the only settlement within EHDC with a one or two digit A road passing through a settlement giving access to shops.

It is noted that, in England and Wales, the single-digit numbers reflect the traditionally most important radial routes coming out of London. These radials are supplemented by two-digit codes which are routes that may be slightly less important, but may still be classified as trunk routes. This the A31 is a significant transport route.

It is known from the 2011 & 2021 ONS Census data that some 76% of the working population travelled more than 5 km for employment, which increased to some 88% in 2021.

Apart from a little increase in Community Facilities, signage, play areas, multi gym and an office for the Parish Council, there has been minimal other increase in infrastructure. The Settlement of Four Marks/ South Medstead is still assimilating the unexpected increase in population.

The increase of 12% in the numbers of residents commuting over 5km, together with the current 27.54% increase in population over the 2013 figure, shows the need for residents to leave the settlement for employment, and thus EHDC is urged to keep Four Marks and South Medstead within Tier 4, and not elevate it to Tier 3, otherwise the rural feel of Four Marks and South Medstead would be destroyed for ever.

Medstead Village

On reviewing the evidence presented by EHDC, Medstead village has been elevated from level 5 to level 4. It mirrors the elevation of Ropley, and the NPSG does not have sufficient information to challenge the evaluation.

The NPSG puts forward further evidence that Four Marks/ South Medstead must remain in Tier 4, particularly:

- *East Hampshire Retail and Main Town Centre Uses Study Final Report – Lichfields*
The report considers the retail offering within the settlements in the 2018 iteration of Tier 3, and identifies that the number of retail outlets in each location, and the strength and weakness of each settlement:

- Grayshott – 59

Strengths

Grayshott continues to provide a good range of convenience retailers along with Class A1 and A2 service uses for a centre of its size.

Whilst the provision of comparison units is significantly below the national average, the provision includes a few higher quality independent retailers.

The vacancy rate has increased since 2007, but remains below the national average.

Weaknesses

As in 2007, Grayshott has a limited range of comparison retailers along with Class A3 and A5 uses (restaurants, cafés and takeaways) for a centre of its size.

There continues to be a limited range of Class A1, A3, A4 and A5 uses.

- Horndean – 25

Strengths

Horndean continues to provide has a reasonable range of convenience retailers along with Class A1 and A2 service uses for a centre of its size and a comparable proportion of Class A3 and A5 uses (restaurants, cafés and takeaways). The vacancy rate has reduced since 2007 and is much lower than the national average.

Weaknesses

As in 2007, Horndean has a limited range of comparison retailers with no clothing and footwear retailers. The comparison offer is limited and is made up of lower order retailers. There are no national multiples.

- Clanfield - 18

Strengths

As in 2007, Clanfield has a good range of convenience retailers along with Class A1 and A2 service uses (estate agents and valuers and hairdressers and beauty parlours) and Class A3 and A5 uses (restaurants, cafes and takeaways) for a centre of its size.

Weaknesses

Clanfield continues to provide a limited range of comparison retailers and service uses for a centre of its size. The vacancy rate has increased, although this is still below the national average.

- Four Marks - 17

Strengths

Four Marks continues to provide a good range of convenience retailers along with Class A1 service uses and A5 uses (takeaways) for a centre of its size. The centre has a good range of convenience units.

Weaknesses

As in 2007, Four Marks has a limited range of comparison retailers. There are no Class A2 service uses or restaurants/cafés, although there is a bakery/ sandwich shop with seating for a centre of its size. Whilst the proportion of Class A1 comparison units is slightly higher than the national average, this provision is made up of only 6 units, which offer a limited range and choice.

The NPSG note this shows that Four Marks/'South Medstead' offers the least retail offering of the group, indicating that its location in Tier 4 is justified.

The Appendix 13.5.C *Alton Facilities vs Four Marks/'South Medstead' facilities vs Population*⁴⁹ links the Four Marks retail offering with that of Alton, and provided the data to show why Four Marks/'South Medstead' residents migrate to Alton for a better range of facilities.

- *Hampshire County Council Comment to EHDC Planning Application 52254*⁵⁰
In the Statutory Consultees comment on the Planning application, Hampshire County Council, through its Hampshire Highways Officer makes comment on the sustainability of the Four Marks/ 'South Medstead' Settlement particularly with regards to the linear form of the settlement and the constraints created by the A31 junctions, particularly on the loading at the offset Lymington Bottom/ Lymington Bottom Road.

⁴⁹ Appendix 13.5 C below

⁵⁰ Appendix 13.5 D below

The Officer notes:

'Transport Policy

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 them from using these modes instead of their cars. Whilst Four Marks has a cluster of key facilities and services fronting the A31 and the adjoining Lymington Bottom Road such as grocery stores, bakery, restaurants, pharmacy and doctor's surgery, the accessibility of these facilities is reduced predominantly because of the severance and traffic dominance created by the road.

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 that HCC is proposing to adopt in its new Local Transport Plan (LTP4). 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 roadspace and managing vehicle access in specific locations. 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.'

It goes on to note:

'The settlement hierarchy justification is set out within the East Hants Local Plan evidence base to the Reg 18 consultation. Whilst Four Marks and Medstead is noted to have a higher than the median score for accessibility for the district it is not the sole determining factor for the proposed settlement hierarchy, but it informs the decision-making process around the existing accessibility level of an area and the likely levels of supporting infrastructure/services which would be required to support development. For Four Marks/' South Medstead' it is noted that due to the linear settlement pattern the peripheral areas within the settlement fall beyond the walking and cycling catchments for many of the local service and was therefore initially placed in Tier 4, however due to other consideration factors was moved to Tier 3, permitting some development in Four Marks.

Given the site's location, the Highway Authority have significant concerns regarding the sustainability of the proposed development, particularly in relation to the walking distances to local facilities within Four Marks. Active Travel England (ATE) identify that a site should have access to a sufficient number of amenities within an 800m walking distance via an accessible walking route.

... only a park or green space, indoor meeting place and primary school are available within the 800m walking distance. The remaining facilities are over 1km away from the site and, in some cases, require crossing the A31. Most of the facilities are above the 'elsewhere' maximum walking distance identified within the CIHT Providing for Journeys on Foot document such as the nearest coffee shop, surgery, post office and also local convenience store (Tesco Express). Consideration must also be given to access to Secondary School provision, reasonable employment opportunities and the level of service that is offered by the facilities within the accessible area and wider immediate vicinity of the site, and how they may be accessible by sustainable modes.

Given the number of live planning applications in the Four Marks area, and also the traffic flow associated with this application (which are yet to be determined, but will be in excess of the figures presented within the TA), the Highway Authority has been requesting a cumulative traffic impact assessment at the A31/Lymington Bottom staggered crossroads. As the latest application to come forward in the area, the Highway Authority requires modelling of this junction once the traffic flows and distribution split have been agreed.'

After considering the expert opinion of Hampshire Highways, the NPSG strongly requests EHDC to reconsider its decision to raise the Four Marks/'South Medstead' settlement to Tier 3 but return it to Tier 4.

- *DLP Chapter 12 - Site Allocations*

The NPSG has reviewed the selection of sites to be included within *Chapter 12 - Site Allocations in Appendix 13.5 E*, below. The review has been carried out applying the new policies of the Draft Local Plan to the sites for the currently proposed Tier 3 Settlements with regards to the published EHDC Objectives for the Plan:

A1 Provide a sustainable level of housing growth to meet future housing needs and to provide homes for all, helping to deal with the issues of affordability and an ageing population.

The Local Plan will:

- a) identify and maintain a supply of land to meet the requirements for market housing and housing that is affordable, ensuring this is of the right size, type and tenure, and is in the right location; and*
- b) make provision for gypsies, travellers and travelling showpeople accommodation to meet needs.*

B1 Make sure that new developments are located to maintain and improve the quality of built and natural environments, including our high-quality and valued built heritage and landscapes, whilst maintaining the integrity of existing settlements and their settings.

B3 Ensure that new development prioritises the achievement of net-zero carbon emissions, whilst being resilient to the impacts of climate change and delivering the ten characteristics of well-designed places.

B4 Enable people to live locally and reduce their reliance on the private car, to help reduce the impacts of transport on the environment and improve health and wellbeing.

- B5 *Ensure the responsible use of land and natural resources, including through the adoption of a whole life-cycle approach to development that will reduce carbon emissions.*
- C1 *Enable and encourage timely delivery of services and infrastructure to support strong communities. Enable infrastructure (including community facilities) to keep pace with technology and improve and adapt to meet current and future needs.*
- C2 *Enable infrastructure (including community facilities) to keep pace with technology and improve and adapt to meet current and future needs.*
- C3 *Maintain and enhance the built and natural environments to support habitats and their connectivity, help the public to access and enjoy open spaces and green infrastructure.*
- C4 *Ensure sport and recreation opportunities are available in the right location to meet current and future needs.*

After looking at the location of the proposed sites in its Appendix 13.5 A, in the light of the logic in setting the proposed Settlement Hierarchy, the NPSG has observed that some of the most sustainable settlements have been passed over, although they have sites with reasonable or better accessible scores.

The NPSG notes that this is contrary to the proposed Policies CLIM 1, CLIM2 and CLIM 5.

Supported by the strong evidence from our research the NPSG request EHDC to reconsider the Settlement Hierarchy and return Four Marks/ 'South Medstead' settlement to Tier 4.

Appendix 13.5.A Philosophy employed EHDC to determine Settlement Hierarchy

The 2024 paper moves Four Marks/'South Medstead' to a Tier 3 settlement; and Medstead remains as a Tier 4 settlement.

Comments to the EHDC Reg-1 Consultation (2022/3) included comments on the consideration of a '20 Minute Neighbourhood' (20M) concept have been taken into consideration by EHDC in producing this amended document. It is noted that the 20MN is not appropriate for some areas, as it used 'crow flies' distances and did not account for barriers to progress, topography and lack of footways; the demographic composition of the settlement. It did not include data covering employment clusters. There was also discussion on the competence of the list that considered the facilities in each settlement.

Paragraph 3.9 notes:

' By contrast, the categorisation of Four Marks and South Medstead was not well received. Some responses suggested that it was inappropriate for Four Marks and South Medstead to be ranked in Tier 2 of the hierarchy because the existing services and facilities are not, in reality, accessible for many residents by means of short walking and cycling journeys'

The NPSG are heartened to note that this has resulted in a more robust approach to determining the Settlement Hierarchy for the District, including an *Accessibility Study*, considering the viability of 20MN, and where in the District would be the best place to locate development, to support sustainable transport, linked to sites put forward to the EHDC Land Availability assessment.

Research for the document suggested that a walking time of 10 minutes to a destination was acceptable for most pedestrians.

It is noted in paragraph 4.7:

' Recognising the different reasons for accessing facilities and services within the district, these were split into six categories based on the following 'social functions': living, working, supplying, caring, learning and enjoying. Equal weighting was placed on each of the functions, but varying weightings were attributed to individual facilities, as well as to the mode of travel (walking or cycling). All weightings were determined by reviewing empirical evidence.'

4.12 also notes:

*' the area surrounding the local shopping parade on the **A31 in Four Marks** has scores ranging from 14.9 to 21.4, with other areas of the settlement also scoring higher than the district's median.*

5.7 notes

*' Specifically, some respondents voiced objections to a different approach being applied in the case of **Four Marks & South Medstead**, during the last iteration of the settlement hierarchy. **Consequently, no exceptions have been made to procedures for evaluating accessibility in this revised assessment, except to acknowledge the planned regeneration of Whitehill & Bordon.**'*

5.12. notes

*' By contrast, the average accessibility score **for Four Marks & South Medstead** provides a reason for its demotion within the settlement hierarchy. **Although central areas of Four Marks perform well within the Accessibility Study, the***

linear settlement pattern means that peripheral areas that are within the settlement fall beyond the newly calculated walking and cycling catchments for many of the local services and facilities. The relative distance of Four Marks from larger settlements also means that the settlement does not benefit from being accessible to the services and facilities of other places in the same way as (e.g.) Holybourne and Lindford.'

and 5.14 also notes:

'Some of the district's smaller settlements are now also ranked more highly than in previous iterations of the settlement hierarchy background paper. This applies specifically to Arford, Bentley, Catherington, Griggs Green, Lovedean, **Medstead** and Ropley. The underlying reason for these changes is that the Accessibility Study has enabled a more granular and nuanced review of accessibility to services and facilities by walking and cycling, based on a more thoroughly researched methodology that uses the LSAAT tool (see above).'

Fig 3 of the document, added for each settlement.

Settlement	No. of relevant hexagons	Lowest scoring hexagon	Highest scoring hexagon	Total score (sum of all hexagons)	Mean score	Potential change to 2022 ranking (up, down or no change)
Alton	21	16	58.7	616.1402461	29.34001172	-
Whitehill & Bordon	24	7.9	36.9	515.773875	21.49057813	-
Liphook	10	8.9	37.5	226.770888	22.6770888	-
Horndean	22	9	35	407.152074	18.50691245	-
Grayshott	6	10.5	29.8	104.126744	17.35445733	-
Four Marks & South Medstead	9	20.1	8.2	125.310436	13.92338178	↓
Clanfield	9	9.5	21.9	151.681994	16.85355489	-
Holybourne	3	18.5	24.8	65.360689	21.78689633	↑
Rowlands Castle	7	6.1	19.1	97.791075	13.97015357	↓
Headley	4	8.6	19.8	62.523862	15.6309655	-
Bentley	1	16.7	16.7	16.716111	16.716111	↑
Headley Down	7	6	18.1	86.047364	12.29248057	-
Kingsley	1	10.3	10.3	10.265716	10.265716	↓
Lindford	4	16.4	24.5	83.703254	20.9258135	↑
Ropley	1	13.9	13.9	13.87483	13.87483	↑
Bramshott	1	9.2	9.2	9.160423	9.160423	-
Holt Pound	1	16.6	16.6	16.609833	16.609833	↑
Medstead	1	11	11	10.965128	10.965128	↓
Oakhanger	1	4.1	4.1	4.084005	4.084005	↓
Ropley Dean	1	8.1	8.1	8.1387888	8.1387888	-
Bentley Station	1	7.2	7.2	7.167252	7.167252	-
Bentworth	1	6.9	6.9	6.914357	6.914357	-
Catherington	1	10.7	10.7	10.712467	10.712467	↑
Passfield Common	1	7.1	7.1	7.065371	7.065371	-
Arford	1	10	10	9.974893	9.974893	↑
Beech	3	4.7	8.3	18.643947	6.214649	-
Griggs Green	1	8.2	8.2	8.170017	8.170017	↑
Lasham	1	4.6	4.6	4.599571	4.599571	↓
Lower Froyle	1	6.3	6.3	6.296094	6.296094	-
Lovedean	1	13	13	12.99651	12.99651	↑
Shalden	1	4.8	4.8	4.846437	4.846437	-
Upper Froyle	1	4.3	4.3	4.251085	4.251085	-
Upper Wild	1	3.3	3.3	3.328617	3.328617	-

5.18. states:

'Based on the distribution of settlement average accessibility scores, a five-Tier hierarchy is therefore proposed using the following integer scoring intervals:

1. Average accessibility score ≥ 26 points
2. Average accessibility score ≥ 21 points and ≤ 25 points
3. Average accessibility score ≥ 16 points and ≤ 20 points
4. Average accessibility score ≥ 11 points and ≤ 15 points
5. Average accessibility score ≥ 0 points and ≤ 10 points'

From Figure 3: Average Accessibility Study Score of Settlements in East Hampshire (outside of the South Downs National Park) it is noted Four Marks & South Medstead that scores 13.92,

whilst Medstead scores 10.96, which places both in Tier 4 of the Hierarchy, moving Four Marks/'South Medstead down and Medstead up a Tier.

Using the EHDC philosophy of amending the result due to size of regarding population, EHDC has moved Four Marks/'South Medstead' from Tier 4 into Tier 3.

The Accessibility Study has been further developed to include the size of the population of settlements.

In 6.1 the study notes

'The number of local residents is a good indicator of the potential number of users that may access services and facilities within a settlement on foot or by bike. Generally speaking, the larger the number of residents, the greater the potential number of customers or users that are within 'striking distance'. This can be important for evaluating and amending a potential settlement hierarchy that is otherwise based on average accessibility scores, for these do not consider levels of patronage in a direct manner. Over time, the number and range of services and facilities in a location can change in response to the number of people using them. Services with few customers or users may disappear, whereas more services could emerge in places with a large number of potential customers. It is therefore useful to consider proxies for potential customers or users (noting that future development can also change the dynamic for service provision).'

in 6.2:

'To make the proposed settlement hierarchy more resilient to changes over time, the Council has compared the ranking of settlements by their average accessibility scores with the size of local resident populations. This has been done as far as is reasonably practicable, taking account of limitations in the availability of suitable population data (see below). Nevertheless, it has enabled some important adjustments to the emerging hierarchy, which are identified within Figure 5.'

and in 6.9:

'Similarly, both Four Marks & South Medstead and Rowlands Castle have large resident populations relative to their average accessibility scores, whilst both are close to the top of the scoring interval for Tier 4. An adjustment to the emerging settlement hierarchy is therefore also proposed for both of these settlements, promoting each of them to Tier 3 within the hierarchy. No other changes are proposed in light of the analyses from Figure 5.'

The NPSG do not accept this strategy as it is subjective and has no scientific basis.

The East Hampshire Accessibility Study Report, published 24/01/2024 Information on local facilities in the Local Plan Area and its environs have been obtained from the following data sources:

- Ordnance Points of Interest Data (see appendix A)
- EHDC data (for food banks, parks and green spaces and frequent bus stops)
- Census 2011 data for work population

A 'honeycomb' grid has been laid across East Hampshire District Council (EHDC) planning authority area to create a fine grid of small hexagons. Each hexagon is 500m wide and is given an accessibility score based on the relative accessibility of services and facilities from its central point. **Each hexagon within EHDC planning authority area is scored based on its accessibility within 10 minute walk and cycle.** The results of the accessibility study (illustrated in a honeycomb grid) show that the **hexagons generally score higher at locations near town centres, particularly Alton, Bordon, Horndean and Clanfield.**

At Section 3, it notes that

'There is evidence that people walk less in rural areas, rather than having willingness to walk further'.

At 5.3.6 and 5.3.7 it reports that

' The LCWIP proposals would improve the attractiveness of walking and cycling, but they are unlikely to affect the 10 min walking and cycling times applied in this methodology.

' This analysis concludes that in many instances, improvements to the living locally accessibility score would require the delivery of new daily facilities.'

At Appendix A.12.5 it is noted that

'it is concluded that the 10min isochrones should be taken forward.'

And notes :

Recommendations

A.12.6 *On this basis, it is recommended that Option 2 is progressed for the purpose of the accessibility study for the following reasons:*

1. *It provides a more transparent and simplified approach to accessibility study, whilst still reflecting the pattern of scoring of all three options.*
2. *It considers the ATE core facilities are weighted higher than other facilities within each social function.*

A.12.7 *There is risk with Option 3 that local living could be achieved by just the delivery of one of each ATE core facilities (a food shop; a park or green spaces; a primary schools; a post office or bank; a GP surgery; and a bus stop or railway station), as these are weighted very high in option 3. Option 2 applies a higher weighting to these ATE core facilities than to other facilities, but it does not weight the ATE core facilities as highly as option 3. Option 2 gives a stepped score for those with 1 , 2 or 3 of each facility.*

The NPSG are aware of the constraints of the lack of facilities in Four Marks/'South Medstead', and the regular need to access Alton, and more distant locations of Basingstoke and Winchester, for their retail needs.

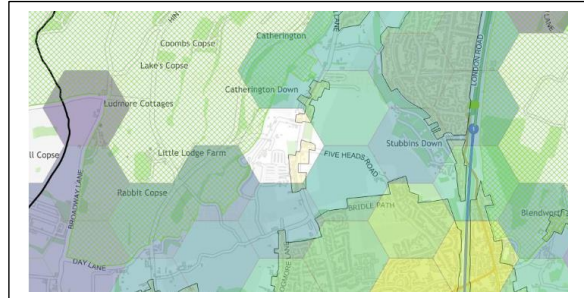
This was noted in the *Hampshire Retail and Main Town Centre Uses Study Final Report* by Lichfields , part of which is in 13.5. Appendix C.

The following maps are found in the *Revised Settlement Hierarchy Background Paper*, January 2024, and have the mean hexagon score, found in Fig 3 of the document, added for each settlement.

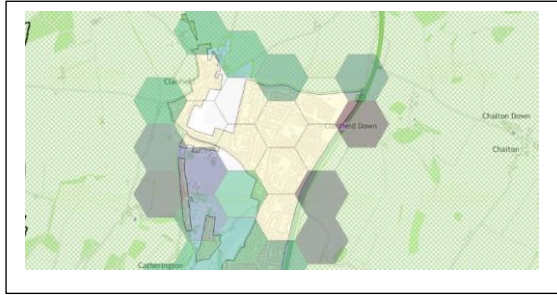
The NPSG notes the typographical errors regarding the hexagon scores for Four Marks/'South Meadsted', the minimum and maximum entries have been transposed.



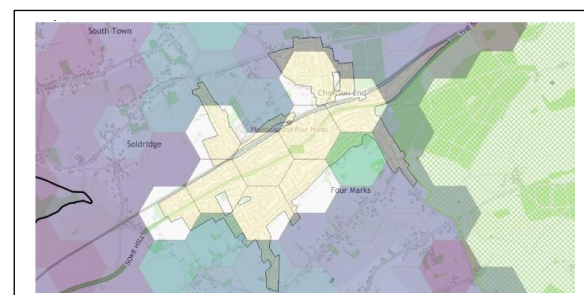
Map 4: Bentley 16.71



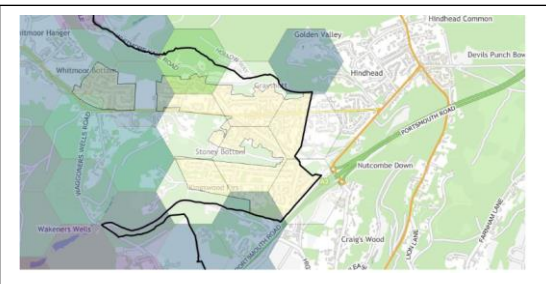
Map 8: Catherington 10.71



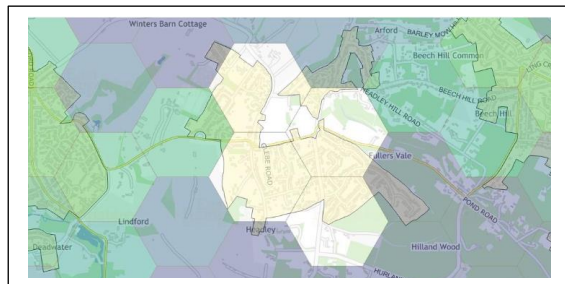
Map 9: Clanfield 16.85



Map 10: Four Marks 13.92



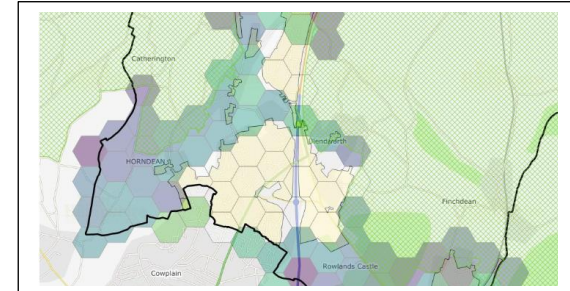
Map 11: Grayshott 17.35



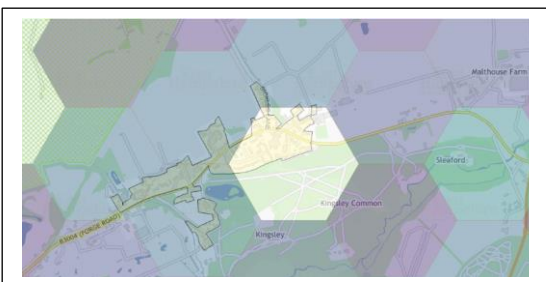
Map 13: Headley 15.63



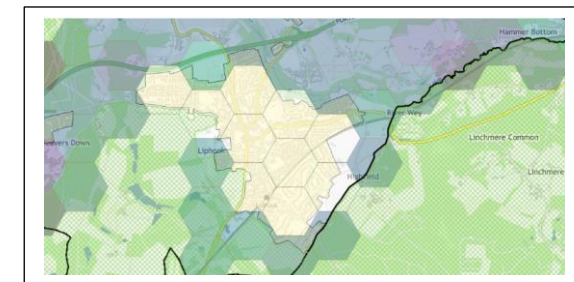
Map 15: Holt Pound 16.60



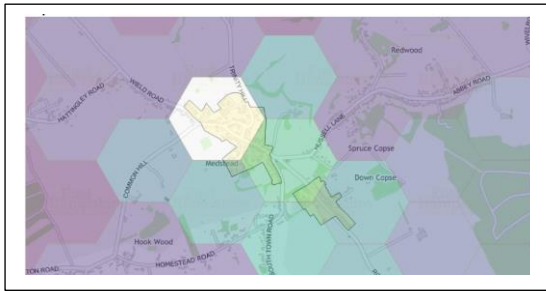
Map 17: Horndean 18.50



Map 18: Kingsley 10.26

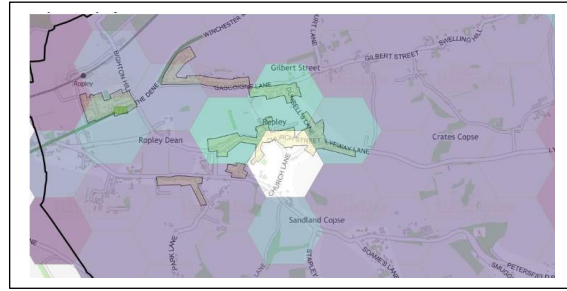


Map 21: Liphook 22.67



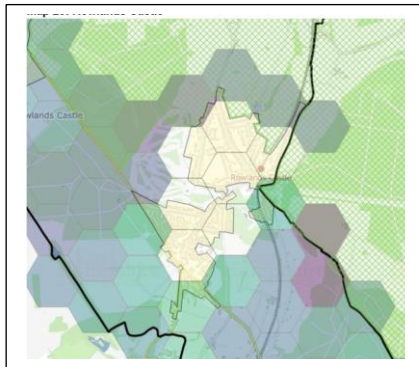
Map 24: Medstead

10.96



Map 17: Ropley

13.87



Map 17: Rowlands Castle

13.97

Appendix 15.5.B East Hampshire Retail and Main Town Centre Uses Study Final Report - Lichfields

EHDC commissioned Lichfields to produce the East Hampshire Retail and Main Town Centre Uses Study Final Report, 2018.

The major food retailers used by residents in various areas of the District:

Origin Zone	Destination	Destination Zone
Zone 1 – Alton	Sainsbury's, Draymans Way, Alton (22.6%)	1
	Tesco Extra, Winchester (19.5%)	Outside study area
	Aldi, Alton Retail Park (14.6%)	1
	Waitrose, Station Road, Alton (6.2%)	1
	Internet (10.6%)	n/a
Zone 2 – Whitehill & Bordon	Tesco, High Street, Whitehill & Bordon (41.6%)	2
	Sainsbury's, Midhurst Road, Liphook (14.6%)	3
	Sainsbury's, Draymans Way, Alton (12.8%)	1
	Lidl, Forest Centre, Whitehill & Bordon (12.7%)	2
	Internet (5.3%)	n/a
Zone 3 - Liphook	Liphook Sainsbury's, Midhurst Road, Liphook (37.8%)	3
	Tesco, Haslemere (31.7%)	Outside study area
	Internet (8.2%)	n/a
Zone 4 – Petersfield	Tesco, Petersfield (35.2%)	4
	Waitrose, Petersfield (24.9%)	4
	Sainsbury's, Midhurst Road, Liphook (7.4%)	3
	Internet (5.1%)	n/a
Zone 5 – Horndean	Morrisons, Lakesmere Road, Horndean (43.3%)	5
	Sainsbury's, Waterlooville (10.6%)	Outside study area
	Asda, Waterlooville (10.5%)	Outside study area
	Lidl, Waterlooville (7.5%)	Outside study area
	Waitrose, Waterlooville (7.5%)	Outside study area
	Internet (5.9%)	n/a

Source: NEMS Household Survey, August 2018 (weighted results question 1)

The report notes

“Grayshott, Four Marks and Clanfield are all much smaller, with only a very limited number of retail units that cater for local needs.”

As part of the study, it identified the following commercial outlets:

Number of Units	Grayshott	Horndean	Clanfield	Four Marks	Rowlands Castle
Class A1 - Comparison	15	6	4	6	3
Class A1 – Convenience	6	2	4	6	1
Class A1 - Service	16	6	3	1	0

Class A2 – Financial Services	9	1	2	0	2
Class A3 – Restaurants/Cafés	4	2	1	0	0
Class A4 – Pubs/Bars	1	3	1	0	2
Class A5 – Takeaway 1 *inc in Class A	3	4	1	3	0
Vacant (Class A1-A5)	5	1	2	1	1
Total	59	25	18	17	9

Grayshott local centre

Grayshott is identified as a Local Centre in the retail hierarchy set out in Policy CP8 of the JCS. It is in the north east of the District and is a relatively large local centre. The main shopping areas of the centre are focussed around Headley Road and Crossways Road. The centre also includes the square, which is a pedestrianised shopping area located on the northern side of Headley Road. The centre has a good range of retail and service uses for its size. Its key roles include:

Convenience – a good range of convenience offer, including a Coop (Headley Road – 275 sq.m) and Sainsbury’s Local (Headley Road - 233 sq.m), supplemented by a bakery, butchers, off licence and greengrocers. These facilities meet the day to day top-up shopping needs of local residents.

Comparison – the main comparison units are located along Headley Road and Crossways Road. The comparison offer is lower than the national average and is predominantly made up of independent retailers. There are a few higher quality independent gift and interior furnishing shops. There are also a few lower quality comparison shops, such as charity shops.

Services – there is a good range of service uses, including barbers, hairdressers, post office, beauty salons, travel agent, estate agents, funeral director, solicitors and shoe repairs. There are no banks present in the centre (previously there was Lloyds and Natwest).

Food and Beverage – there is a reasonable range of food and beverage uses, comprising cafés, a restaurant, a public house and a few takeaways.

Entertainment/Leisure – there are no entertainment/leisure uses.

Other – the centre includes a variety of other uses, such as dentists, a vets, chiropractor and property services.

The convenience goods expenditure attracted to Grayshott local centre is around £6 million in 2018 (Table 5, Appendix 2), which is 3% of the total convenience goods spending attracted to East Hampshire District’s facilities stores. The comparison goods expenditure attracted to Grayshott local centre is less significant at around £4 million in 2018 (Table 5, Appendix 3), equivalent to 5% of the total comparison goods spending in East Hampshire District. Food and beverage expenditure attracted to Grayshott local centre is around £5 million in 2018 (Table 5, Appendix 4), 9% of the total food and beverage spend within East Hampshire District. The combined turnover of Grayshott local centre is around £15 million. This indicates Grayshott’s role as a local destination in the study area.

Grayshott local centre has 59 Class A units.

The proportion of Class A1 comparison units is significantly lower than the national average, whereas the proportion of Class A1 convenience units is slightly higher than the national average. The centre has a strong provision of Class A1 and Class A2 service uses, but the provision of Class A3 (restaurant/café), Class A4 (pubs/bars) and Class A5 (takeaways) is lower than the national average.

There are five vacant units in the centre and the vacancy rate (8.5%) is below the national average, suggesting the centre is performing well. A number of these vacant units were under alteration, suggesting they are due to be occupied soon. However, there were no vacant units in 2006, which suggests the centre has not fully recovered from the recession. The proportion of Class A1 comparison and convenience goods units has decreased since 2006, due to the increased vacancy rate.

The main shopping areas of Grayshott are focussed around Headley Road and Crossways Road, along with the pedestrianised square, off Headley Road. The Primary Shopping Area is split into two parts to reflect this. Overall, the centre is of good quality, with well-maintained and attractive shop fronts/units.

There is car parking located within/on the edge of the centre, offering free parking. The centre is served by a bus route providing access to Haslemere and Aldershot.

The strengths and weaknesses identified in the previous study (2007) have been reviewed and updated. The key changes have been highlighted.

Strengths

Grayshott continues to provide a good range of convenience retailers along with Class A1 and A2 service uses for a centre of its size.

Whilst the provision of comparison units is significantly below the national average, the provision includes a few higher quality independent retailers.

The vacancy rate has increased since 2007, but remains below the national average.

Weaknesses

As in 2007, Grayshott has a limited range of comparison retailers along with Class A3 and A5 uses (restaurants, cafés and takeaways) for a centre of its size.

There continues to be a limited range of Class A1, A3, A4 and A5 uses.

Horndean local centre

Horndean is identified as a Local Centre in the retail hierarchy set out in Policy CP8 of the JCS.

It is in the south of the District and is a relatively small centre, predominately serving the needs of local residents. Notwithstanding this, it is located just off the A3(M) and therefore has good links with the surrounding area. The centre has a reasonable range of retail and service uses for its size. Its key roles include:

Convenience – for a centre of its size, there is a good provision of convenience goods retailing, including a Spar shop (with post office) and a newsagent. Outside of the town centre boundary, there is a large Morrison's supermarket located on Lakesmere Road to the south west of the centre (3,500 sq.m). The convenience goods expenditure attracted to Horndean local centre is around £26 million in 2018 (Table 5, Appendix 2), which is 14% of the total convenience goods spending attracted to East Hampshire District's facilities stores. Most (98%) of this trade is attracted to Morrison's on Lakesmere Road.

Comparison – the main comparison units are located along Portsmouth Road and in the precinct. The comparison offer is limited and is made up of lower order retailers. There are no national multiples.

Services – there is a good range of service uses, including barbers, hairdressers, beauty salons, a travel agent and an insurance brokers.

Food and Beverage – there is a reasonable range of food and beverage uses, comprising cafés, public houses/restaurants and takeaways.

Entertainment/Leisure – there are no entertainment/leisure uses.

Other – the centre has a Premier Inn, reflecting its location near to a major arterial route.

Horndean local centre has a score of 11 and is ranked 2,815th in the UK. This is lower than Liphook district centre and Alton town centre. Horndean local centre has 25 Class A units. The number of uses within each category is limited (6 or less outlets). The mix of uses has changed slightly since 2006. The proportion of Class A2 non-retail service uses has reduced but remains around the national average. The vacancy rate has reduced and is much lower than the national average. The comparison units include a ladies wear, second-hand furniture and 'vape' shop. There is only one vacant unit in the centre.

The main shopping area of Horndean is located along Portsmouth Road and in the precinct and comprises predominantly independent, lower order retailers. Generally, the centre is of good quality, with well-maintained shop fronts. The precinct area is however of poorer quality and does not offer an inspiring or welcoming shopping environment – this area would benefit from investment.

There is car parking located within/on the edge of the centre, for example, the car park adjacent to the precinct and on Blendworth Lane. These both offer free parking. The centre is well served by buses, with bus stops located along Portsmouth Road, which provide services to Clanfield, Petersfield, Portsmouth and Havant.

The household survey results indicate 17% of all respondents had visited Horndean for shopping in the last 12 months. These respondents were asked what they like or dislike about shopping in Horndean. Around 18% liked the centre because it is close to home and 9% said there are good cafés/ restaurants. In terms of factors disliked, 8% said there was not enough variety of shops in general and 5% said that there are not enough parking spaces available.

The strengths and weaknesses identified in the previous study (2007) have been reviewed and updated. The key changes have been highlighted.

Strengths

Horndean continues to provide has a reasonable range of convenience retailers along with Class A1 and A2 service uses for a centre of its size and a comparable proportion of Class A3 and A5 uses (restaurants, cafés and takeaways).

The vacancy rate has reduced since 2007 and is much lower than the national average.

Weaknesses

As in 2007, Horndean has a limited range of comparison retailers with no clothing and footwear retailers. The comparison offer is limited and is made up of lower order retailers. There are no national multiples.

Clanfield local centre

Clanfield is identified as a Local Centre in the retail hierarchy set out in Policy CP8 of the JCS. It is in the south of the District and is a small centre, predominately serving the needs of local residents. It is located to the north of Horndean within proximity to the Havant District. The centre has a reasonable range of retail and service uses for its size. Its key roles include:

Convenience – a strong provision of convenience uses, including Coop (White Dirt Lane) (58 sq.m), Budgens, a greengrocer and a butcher.

Comparison – there is a limited range of independent retailers, offering lower order comparison goods, including a haberdashery shop, pharmacy, opticians and hardware store. There are no national multiples.

Services – comprising a hairdresser, hair/beauty salon, barbers, estate agents and funeral directors.

Food and Beverage – a restaurant, bar/restaurant and takeaway.

Entertainment/Leisure – there are no entertainment/leisure uses.

Other – a doctor's surgery.

Clanfield local centre has 18 Class A units.

The number of uses within each category is limited (4 or less outlets). The mix of uses has not changed significantly since 2006, but the vacancy rate has increased. The vacancy rate (11.1%) is slightly lower than the national average.

The main shopping areas of Clanfield are located along Drift Road, White Dirt Lane and Green Lane. Overall, the centre is of good quality. Whilst the commercial units have little architectural interest, they are well maintained, with good quality shop fronts.

In terms of car parking, there are several parking bays located along Drift Road, which offer free parking for up to two hours. There is also customer car parking available outside some commercial units. The centre is served by a bus route that provides services to Havant and Portsmouth (as well as local areas in between). The strengths and weaknesses identified in the previous study (2007) have been reviewed and updated. The key changes have been highlighted.

Strengths

As in 2007, Clanfield has a good range of convenience retailers along with Class A1 and A2 service uses (estate agents and valuers and hairdressers and beauty parlours) and Class A3 and A5 uses (restaurants, cafes and takeaways) for a centre of its size.

Weaknesses

Clanfield continues to provide a limited range of comparison retailers and service uses for a centre of its size.

The vacancy rate has increased, although this is still below the national average.

Four Marks local centre

Four Marks is identified as a Local Centre in the retail hierarchy set out in Policy CP8 of the JCS.

It is in the north west of the District. It is a small centre predominately serving the needs of local residents. The centre has a reasonable range of retail and service uses. Its key roles include:

Convenience – for a centre of its size, a strong provision of convenience uses, including a Coop (Winchester Road) (345 sq.m), Tesco Express (Winchester Road - 151 sq.m) and M&S, Simply Food (part of the BP Garage - 84 sq.m). These stores are supplemented by two off licences' and a bakery.

Comparison – the main comparison units are located along Winchester Road. There is a limited range of independent shops selling lower order comparison goods. This offer is made up of a florist/gift shop, cycle shop, sports shop, pharmacy, opticians and a framing shop. There are no national multiples.

Services – there is only one service use - a hair/beauty salon.

Food and Beverage – there are three takeaways, but no restaurants, pubs or bars. The **bakery has seating and provides a café service.**

Entertainment/Leisure – there are no entertainment/leisure uses.

Other – a tool/plant hire unit, a gospel hall and a health care office.

Four Marks local centre has 17 Class A units.

The number of uses within each category is limited (6 or less outlets). The mix of uses has changed slightly since 2006. The proportion of Class A1 service and Class A2 non-retail service uses has reduced and is significantly lower than the national average. The vacancy rate remains much lower than the national average.

The proportion of Class A1 convenience units is significantly higher than the national average. The centre is well represented by national multiples i.e. Tesco, Coop and M&S Simply Food. There are no Class A3 restaurant/café or Class A4 pubs/bars uses, although there is a bakery/sandwich shop with seating. The proportion of Class A5 takeaways is significantly higher than the national average.

The main shopping area of Four Marks is located along Winchester Road. Overall, the centre is of good quality. Whilst the commercial units have little architectural interest, they are well maintained, with good quality shop fronts.

In terms of car parking, there is some free parking available on street, along Winchester Road and there is also a free car park in front of the main parade of shops. The centre is served by a bus route providing access to Alton and Winchester.

The strengths and weaknesses identified in the previous study (2007) have been reviewed and updated. The key changes have been highlighted.

Strengths

Four Marks continues to provide a good range of convenience retailers along with Class A1 service uses and A5 uses (takeaways) for a centre of its size. The centre has a good range of convenience units.

There is only one vacant unit, which suggests there is good demand for shop premises.

Weaknesses

As in 2007, Four Marks has a limited range of comparison retailers. There are no Class A2 service uses or restaurants/café, although there is a bakery/sandwich shop with seating for a centre of its size.

Whilst the proportion of Class A1 comparison units is slightly higher than the national average, this provision is made up of only 6 units, which offer a limited range and choice.

Rowlands Castle local centre

Rowlands Castle is not defined in the retail hierarchy, as set out in Policy CP8 of the JCS. It is however identified as a small local service centre in the JCS. Rowlands Castle is in the south of the District and has a limited retail and service offer, predominately meeting the needs of local residents.

The centre has no Class A1 services, Class A3 uses (restaurants/café) or Class A5 (takeaways). The choice of other shops and services is limited. The centre has a small selection of independent outlets including a pharmacy, crafts shop and hardware store. There is one convenience store (Londis) which provides a day to day top up facility for local residents. Non-retail services include a solicitor and an estate agent. A café has recently closed (the only vacant unit in the centre). There are two pubs. In terms of other uses present (non-Class A uses), there is a doctors' surgery, a vet and a MOT/car sales garage.

For a centre of its size, it is performing well and the provision is consistent with what is expected for a small local service centre. It is an attractive, healthy centre which functions well for its needs. The centre appears to be healthy and viable.

This was updated in the Community Facilities Study For the East Hampshire District Local Plan 2023⁵¹ which makes minimal changes

⁵¹ Community Facilities Study For the East Hampshire District Local Plan, September 2022, & 2023
<https://www.easthants.gov.uk/media/8548/download?inline>

It should also be noted that the *Community Facilities Study For the East Hampshire District Local Plan*, September 2022, reported :

Four Marks

- 7.13 *As an exception to the general good coverage of meeting places across the North/A31 corridor, there is a notable absence of facilities in Four Marks in relation to the size of the village, the recent growth experienced and the quantum of facilities in other places. The village currently has one facility; Four Marks Village Hall. This facility is well used but is not a modern flexible space that can respond to the varying and growing needs of this community.*
- 7.14 *However, in 2021, £1.25m of CIL funding was allocated to Four Marks Community Building and Recreational Hub. This project is being led by Four Marks Parish Council, to provide a multi-functional, modern, adaptable new community space, that will include sports, meeting place space, café and venue for hire, located at the recreational ground. The Centre will serve residents in Four Marks, South Medstead and surrounding villages if providing for specific interests. There is a desire to provide community space for young people, and also assist with the aspirations for park and stride to the primary school. This has been a long-standing ambition for the local area, given the growth the area has experienced.*
- 7.15 *The project has experienced delays due to the Public Works Board Loan being slow to obtain, however, this has been conditionally approved. This loan forms the backbone of the project, so it is now envisaged that the pace of progress will quicken.*
- 7.16 *This future new facility in Four Marks will be in addition to the existing Four Marks Village Hall, and provide additional community floorspace to serve the residents of the village and beyond. However, given that the current Village Hall is not considered modern, its long term future use and possible investment if required as community floor space, may need consideration. This would be best considered when provision of the new facility has been progressed much further.*
- 7.17 *Supporting and delivering the new Community Building and Recreational Hub in Four Marks remains the priority for this area – no further meeting place type use is needed in Four Marks. That is not to say that other community uses are not needed in this area, and that is considered further on.*
- 11.5 *Pubs are well distributed, although the absence of any provision in Four Marks is noted. That is not to make any assumptions about market demand for such a facility.*

and in the *Community Facilities Study For the East Hampshire District Local Plan 2023*

Four Marks

- 8.19 *The village currently has one facility; Four Marks Village Hall. This facility is thought to be well used but is not a modern flexible space and may not be able to fully respond to the varying and growing needs of this community.*
- 8.20 *In 2021, £1.25m of CIL funding was allocated to Four Marks Community Building and Recreational Hub. This project is being led by Four Marks Parish Council, to provide a multi-functional, modern, adaptable new community space, to include sports, located at the recreational ground. The Centre would serve residents in Four Marks, South Medstead and surrounding villages if providing for specific interests. There has been a long-standing desire for increased provision, given the growth the area has experienced.*
- 8.21 *A planning application was submitted in May 2023 for the new build (ref: 56171/003). The Parish Council is considering options in relation to community building provision in the parish, alongside existing provision at the village hall.*

11.3 *In the North, most pubs are located in Alton, but some other villages have one pub. The noticeable absence is of any pub in Four Marks. In the last year, two pubs in the North have been lost/closed; the Kings Head in Alton, and the Royal Oak in Lasham.*

Appendix 15.5.C Alton Facilities vs Four Marks/'South Medstead' facilities vs Population

Below is a comparison of Alton and Four Marks with regard to facilities. Alton has a population of 19,40 whilst the population of Four Marks/'South Medstead' is 5,600. Also , Alton has 3.46 times the population of Four Marks/'South Medstead'.

The Retail infrastructure is:

Supermarkets

Four Marks/'South Medstead'	Alton
None	Sainsburys
	Waitrose
	Aldi
	Lidl
Total = None	Total = 4

Convenience Stores

Four Marks/'South Medstead'	Alton
Tesco Metro	Co-op
Co-op	Alton Food & Wine
M&S Food (BP garage)	Alton Express
	Londis
	Iceland
Total = 3	Total = 5

Comparison Stores (including non-retail e.g. hairdressers)

Four Marks/'South Medstead'	Alton
Clementine's fruit/veg	Alton Cleaning Centre
Read's Butcher	Leightons Opticians
Cato computer repairs	Naomi House Charity shop
Rivers Hardware	Mike Frost Carpets
Firework shop	Scope Charity shop
Antique shop	Joce butchers
Loaf Bakery	Istanbul Turkish barber
Willow & Sage Florist	Warren Powell-Richards Estate Agent
Charity shop	Golden Scissors Turkish barber
Arrows Off -licence	Superdrug
The Naked Grape Off-licence	Pure Laundry & dry cleaning
FM Pharmacy	Make my Day flowers
Matheson Optometrist	Alton Clock shop
Alton Sports	MJ Hughes Coins

Faded Skulls - barber	Phase Barbers
First Impression Hair/beauty	Alton Eye care
	Hat tricks
	Alton Flooring
	Savannah's sunbeds
	Mainly framing
	Quirky Woman
	Redken hairdressing
	Clarks shoes
	Waterstones
	Rawlings optician
	Fone Mark
	Alton Nails
	The grape tree
	Boots the Chemist
	Unique Chique Boutique
	Greggs
	Specsavers
	Homes Estate Agent
	Card Factory
	Classic barbers
	ME Howitt – leather goods
	Amaryllis Bridal wear
	Alton barbers
	TH Baker Jeweller
	Bourne Estate agent
	Vodafone phone shop
	Charters Estate Agent
	Wellbeing Pharmacy
	WH Smith
	Holland & Barrett
	Westbrook kitchens & bathrooms
	Grovely Pets
	Lovable Rogues barber
	So Lush – smoothies/icecream
	Wildly Upbeat Printers
	Porters News
	Alley Cats beauty studio
	RJ Store phone shop
	Ducati bikes
	Alton Barn kitchens
	Station barbers

	Second-hand Books
	The Wild Hare vintage couture
	The Tricycle
	Time hair & beauty
	Spirit Nails & beauty
	Ellis & Co – rural property agent
	Chrissy's Top of the town barber
	Alton Model Centre
	Compleet Feet Podiatry & footwear
	Headcase Barbershop
	Hamptons Estate agent
	St Michael's Hospice charity shop
	Cancer Research charity shop
	Savers
	Resurrection furniture
	Oxfam charity shop
	Ritual Beauty
	Boots Opticians/Hearing aids
	Peacocks
	Goldfinch Books
	Fill Up
	Alton Home Hardware
	The Discount Store
	Outdoor Scene Camping & Leisure
	Aveda – The Cutting Room
	Gorgeous Nail Bar
	Hart Wildlife charity shop
	Majestic Wines
	Pet shop
	Shrunken Head tattoos
	Hi-Tech Heating
	Vapella vape shop
	Anstey Road Pharmacy
Total = 15 (+1 Pharmacy)	Total = 86 (+3 Pharmacies)

Public Houses

Four Marks/'South Medstead'	Alton
None	The French Horn
	The George
	The White Horse
	The Ivy

	The Bakers Arms
	The Swan
	The Crown
	The Railway Arms
	Ten Tun Brew House
	The Wheatsheaf
	The Eight Bells
	Cassidy's Bar
Total = NONE	Total = 12

Café/Restaurants

Four Marks/'South Medstead'	Alton
Nosh	River Kwai
Saffron	Dill
	Pizza Express
	Mifta's
	Austen's Cafe
	The Alton Hideout Cafe
	Station Cafe
	Mediterranean Steak house
	Thai Boutique
	The Spice Bank
	The Curry Palace
	Stones
	Sapori - Italian
	Café Nero
	Costa
	Starbucks
Total = 2	Total = 16

Takeaways

Four Marks/'South Medstead'	Alton
Tall Ships fish & chips	Ocean's Eleven
Chinese Takeaway	Gourmet Oriental
	Dominos
	Subway
	Caprinos Pizza
	Papa Johns
	Coffee Cherry

	Chef's Kitchen
	Murat's kebab house
	Cambell's fish and chips
	Hermanos Mexican
	Ali baba Eats
	The Royal Kebab House
	Get in my Deli
	Chinese Takeaway
Total = 2	Total = 15

Banks/Building Societies

Four Marks/'South Medstead'	Alton
None	Santandar
	TSB
	Newbury
	Nationwide
Total = NONE	Total = 4

The East Hampshire Retail and Main Town Centre Uses Study Update Final Report (July 2023) found the following:

Convenience Goods turnover 2023 (£ Millions)

Alton – 78.18

Four Marks – 6.12

Table 2.1 Convenience goods turnover in 2023 (£ millions)

	2023 turnover	Benchmark turnover	Surplus/Deficit
Alton	→ 78.18	89.74	-11.56
Whitehill & Bordon	45.40	27.99	17.41
Liphook	47.10	32.50	14.60
Clanfield	4.16	5.38	-1.21
Four Marks	→ 6.12	5.39	0.72
Grayshott	7.25	7.23	0.02
Horndean	30.12	28.70	1.42
Other	5.03	5.03	n/a
Total	223.37	201.96	21.40

Source: Tables 12 and 13, Appendix 2.

Additionally, public transport is limited in Four Marks/'South Medstead'

Four Marks/'South Medstead' Bus Routes	Alton Bus Routes
64 (Alton - Winchester)	64 (Alton - Winchester)
	65 (Alton - Guildford)

	38 (Alton - Petersfield)
	205 (Alton – Tisteds – Farringdon)
	206 (Alton – Upper Froyle – Bentley – Binstead)
	208 (Alton – Medstead – Bentworth – Lasham)
	13 (Basingstoke – Alton – Bordon)

Bold shows those routes with at least an hourly service.

Facility Conclusions

Although the above tables are factual, then of course, direct comparison of the facility totals is not appropriate as the populations of the two settlements are quite different.

However, the NPSG would argue that by taking into account the populations of both, then you can illustrate that FM/SM has limited facilities for the size of its population, as follow.

If the NPSG considers that Alton has a good level of facilities (as shown above), then if the total number of each facility in Alton is divided by 3.46, (the population of Alton divided by the population of FM/SM, that is, 19,400/5,600), then that would roughly give an indication of the number of each facility that theoretically **should** be present if FM/SM if it *also is to be considered to have a good level of facilities*.

If you then look at the differences - all shortfalls - then it can be clearly seen that for the facilities shown, FM/SM has limited facilities for the size of its population.

Facility	Actual No. in Alton	Actual No. in FM/SM	Suggested No. of facilities in FM/SM (when compared with Alton), if population is factored in.	Theoretical Shortfall in facilities in FM/SM, (numerical)	Theoretical Shortfall in facilities in FM/SM (%)
Comparison Stores	89	16	26	10	38%
Café/restaurants	16	2	5	3	60%
Takeaways	15	2	4	2	50%
Pubs	12	0	3	3	100%
Banks/Building Societies	4	0	1	1	100%

The data for supermarkets and convenience stores has not been included, because it is considered that they are both simply “food shops” and the only real difference is their size. Therefore, the NPSG believe that it would be reasonable to expect supermarkets to predominantly be located in towns and most convenience stores to be in villages.

Appendix 15.5.D Hampshire County Council Comment to EHDC Planning Application 52254

The NSPG would like to draw EHDC's attention to Hampshire Highways response to Planning Application 52254 | *Outline planning application with all matters reserved except for means of access up to 95 dwellings to include the provision of vehicular access point, public open space, landscaping, sustainable drainage systems (SuDS) and up to 2,100 m2 of land in a flexible Class E(e) (Commercial, Business and Service) and Class F2(a) (Local Community) use. | Land North East of Belford House, Lymington Bottom, Four Marks, Alton*⁵².

In its recommendation to the EHSC Planning Officer to the application on Lymington Bottom, Hampshire Highways notes:

'The Highway Authority have significant concerns regarding the sustainability of the proposed development and requires the additional information and assessment work noted within this response. Should EHDC choose to determine the application ahead of this information being provided, the Highway Authority should be contacted for its reasons for refusal.'

With the response, Hampshire Highways review Four Marks/'South Medstead' against its emerging Transport Policy LT4:

'Transport Policy

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 2 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 them from using these modes instead of their cars. Whilst Four Marks has a cluster of key facilities and services fronting the A31 and the adjoining Lymington Bottom Road such as grocery stores, bakery, restaurants, pharmacy and doctor's surgery, the accessibility of these facilities is reduced predominantly because of the severance and traffic dominance created by the road.

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 that HCC is proposing to adopt in its new Local Transport Plan (LTP4). 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 roadspace and managing vehicle access in specific locations. LTP4 also commits to embracing the Healthy Streets Approach which adopts a whole street approach to create environments that feel

⁵² EHDC Planning Portal Planning Application 52254 | **Outline planning application with all matters reserved except for means of access up to 95 dwellings to include the provision of vehicular access point, public open space, landscaping, sustainable drainage systems (SuDS) and up to 2,100 m2 of land in a flexible Class E(e) (Commercial, Business and Service) and Class F2(a) (Local Community) use. | Land North East of Belford House, Lymington Bottom, Four Marks, Alton Highway Authority response.**
<https://planningpublicaccess.easthants.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal= EHANT DCAPR 255059>

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.'

It goes on to note:

' The settlement hierarchy justification is set out within the East Hants Local Plan evidence base to the Reg 18 consultation. Whilst Four Marks and Medstead is noted to have a higher than the median score for accessibility for the district it is not the sole determining factor for the proposed settlement hierarchy, but it informs the decision-making process around the existing accessibility level of an area and the likely levels of supporting infrastructure/services which would be required to support development. For Four Marks/' South Medstead' it is noted that due to the linear settlement pattern the peripheral areas within the settlement fall beyond the walking and cycling catchments for many of the local service and was therefore initially placed in Tier 4, however due to other consideration factors was moved to Tier 3, permitting some development in Four Marks.

Given the site's location, the Highway Authority have significant concerns regarding the sustainability of the proposed development, particularly in relation to the walking distances to local facilities within Four Marks. Active Travel England (ATE) identify that a site should have access to a sufficient number of amenities within an 800m walking distance via an accessible walking route.

... only a park or green space, indoor meeting place and primary school are available within the 800m walking distance. The remaining facilities are over 1km away from the site and, in some cases, require crossing the A31. Most of the facilities are above the 'elsewhere' maximum walking distance identified within the CIHT Providing for Journeys on Foot document such as the nearest coffee shop, surgery, post office and also local convenience store (Tesco Express). Consideration must also be given to access to Secondary School provision, reasonable employment opportunities and the level of service that is offered by the facilities within the accessible area and wider immediate vicinity of the site, and how they may be accessible by sustainable modes.

Given the number of live planning applications in the Four Marks area, and also the traffic flow associated with this application (which are yet to be determined, but will be in excess of the figures presented within the TA), the Highway Authority has been requesting a cumulative traffic impact assessment at the A31/Lymington Bottom staggered crossroads. As the latest application to come forward in the area, the Highway Authority requires modelling of this junction once the traffic flows and distribution split have been agreed.'

After considering the content of the Hampshire Highways response, the NPSG urges EHDC to revisit their decision to raise the Four Marks/'South Medstead settlement from Tier 4 to Tier 3 on the ground of settlement population alone.

Appendix 15.5.E DLP Chapter 12 - Site Allocations

Analysis of Site Allocations.

EHDC has revised its settlement Hierarchy:

Tier in Hierarchy	Names of Settlements
1	Alton (including Holybourne)
2	Horndean, Liphook, Whitehill & Bordon (including Lindford)
3	Bentley, Clanfield, Four Marks (& South Medstead), Grayshott, Headley, Holt Pound, Rowlands Castle
4	Arford, Catherington, Headley Down, Kingsley, Lovedean, Medstead, Ropley
5	Beech, Bentley Station, Bentworth, Bramshott, Griggs Green, Lasham, Lower Froyle, Oakhanger, Passfield Common, Ropley Dean, Shalden, Upper Froyle, Upper Wield

The NPSG notes that the LPA propose 42 sites across 5 Tiers of settlements, some 32 sites re residential, 3 G&T and 2 medical, over the Tiers 1 to 5 of the District.

Tier	Houses	G&T	Alton	Bordon	Horn dean	Liphook	Clanfield	Four Marks / 'South Medstead'	Rowlands Castle	Bentley	Holt Pound	Medstead	Headley Down	Cathrington	Bentworth	Lovedean
1	1,264	6 Plots	1,264													
2	1,055			623	320	112										
3	574	2 Pitches					180	210	2 Pitches	145	20	19				
4	28	6 Plots										15	6 Plots	13		
5	40														10	30

The housing allocations

- Tier 1 Dwellings: 1,264, over 3 settlements
- Tier 2 Dwellings: 1,055, over 3 settlements
- Tier 3 Dwellings: 574, over 5 settlements
- Tier 4 Dwellings: 28, over 2 settlements and
- Tier 5 Dwellings: 40, over 2 settlements,

The NPSG notes that EHDC are locating major developments on Tier 1 and 2 Settlements the District, but note a distribution of over the proposed Tier 3 settlements, Grayshott has not been asked to contribute, although has two sites that

could be brought forward, whilst the Tier 4 Settlements of Catherington and Medstead provide 28; and the Tier 5 settlements of Bentworth and Lovedean provide 40. (**Note:** *The Revised Settlement Hierarchy, 2024, identifies Lovedean as a Tier 4 settlement*).

In Tier 1, Alton, the largest settlement in the District, has taken the major portion of the allocation including the Strategic site of Neatham Down.

The Tier 2 Settlements are allocated:

- Bordon, a designated New Town - 623 Dwellings,
- Horndean -320 Dwellings,
- Liphook -112 Dwellings,

The Tier 3 settlements are allocated:

- Bentley - 20 Dwellings,
- Clanfield - 180 Dwellings,
- Four Marks / 'South Medstead' - 210 Dwellings,
- Grayshott - 0 Dwellings,
- Headley - 180 Dwellings,
- Holt Pound - 19 Dwellings,
- Rowlands Castle -145 Dwellings,

Similarly, the Tier 4 Settlements are allocated:

- Arford - 0 Dwellings,
- Catherington - 130 Dwellings,
- Headley Down – 6 traveller plots
- Kingsley - 0 Dwellings,
- Lovedean - 30 Dwellings,
- Medstead - 15 Dwellings,
- Ropley - 0 Dwellings,

And Tier5

- Beech- 0 Dwellings
- Bentley Station- 0 Dwellings
- Bentworth - 10 Dwellings,
- Bramshott - 0 Dwellings Griggs Green - 0 Dwellings
- Lasham - 0 Dwellings
- Lower Froyle- 0 Dwellings,
- Oakhanger - 0 Dwellings,
- Passfield Common - 0 Dwellings
- Ropley Dean - 0 Dwellings,
- Shalden - 0 Dwellings,
- Upper Froyle, - 0 Dwellings,
- Upper Wield - 0 Dwellings,

The NPSG notes the attempt to allocate housing to key settlements outside the SDNP but note some of the sites with higher Accessibility scores in the Settlement Hierarchy grading are required to provide a smaller contribution than others with less facilities,

although there has been acceptable development land put forward by landowners.

In the *Revised Settlement Hierarchy Background Paper*, each settlement is scored using the research carried out in the EHDC commissioned an *East Hampshire Living Locally Accessibility Study and Decide & Provide Methodology (Ridge Report 1)*⁵³, as shown in *Figure 4: Distribution of Average Accessibility Study Scores (no. of settlements recording a certain score)*⁵⁴ Found in Appendix 12 A.

From the Table it is noticeable that there are four discrete groupings

- Group 1 – 29 points
- Group 2 – 21 to 23 points
- Group 3 16 to 19 points and
- Group 4 3 to 14 points.

The EHDC Consultant has used the mean score of each settlement, as shown in *Figure 3: Average Accessibility Study Score of Settlements in East Hampshire (outside of the South Downs National Park)*, to identify which settlement falls within each group, which creates the table below:

Group	Points Score	Settlement (Mean Score Order)
Group 1	29	Alton (including Holybourne)
Group 2	21 to 23	Whitehill & Bordon (including Lindford), Liphook, and Horndean,
Group 3	16 to 19	Grayshott, Clanfield, Holt Pound Bentley, and Headley,
Group 4	3 to 14	<p>Score above 9.5: Rowlands Castle, Four Marks (& South Medstead), Ropley, Lovedean, Headley Down, Medstead, Catherington, Kingsley, and Arford</p> <p>Score below 9.5: Bramshott, Griggs Green, Ropley Dean, Passfield Common, Bentley Station, Bentworth, Lower Froyle. Beech, Shalden, Lasham, Upper Froyle, Oakhanger, and Upper Wield,</p>

The revised settlement hierarchy determined Group 4 should be split to those above the mean score of 9.4 and those below.

To the rating in the table above, EHDC has applied another metric, settlement population, as noted in Section 6 of the document:

A further, apparently subjective, decision was made to review the current settlement population should be considered when defining the Settlement Hierarchy. The NPSG is very concerned when the population in Four Marks/ 'South Medstead' is considered

⁵³ Source of Data EHDC Portal: Draft Local Plan 2021 to 2028 Reg 18 Consultation. East Hampshire Living Locally Accessibility Study and Decide & Provide Methodology (Ridge Report 1)
<https://www.easthants.gov.uk/sites/default/files/2024-01/Report%201%20-%20accessibility%20study.pdf>

⁵⁴ Source of Data EHDC Portal: Draft Local Plan 2021-2040 (Regulation 18) Revised Settlement Hierarchy Background Paper January 2024 p18
<https://www.easthants.gov.uk/sites/default/files/2024-01/Revised%20settlement%20hierarchy.pdf>

in this way, especially as since the EHDC Local Plan 2013 to 2028 (Joint Core Strategy) determined that the settlement would be expected to host some 175 new dwellings in the Plan period.

From tracking the EHDC annual return to UK Government on Housing completions, the Settlement had provided 571 dwellings to 31st January 2023. This is 396 more than planned and is estimated to have created an increase of some 950 people living in the settlement.

The NPSG also notes that there has not been any increase in employment in the area sufficient to support this increase in population, which requires residents to commute out of the village for employment. This is supported by the ONS 2011 and 2021 Census data⁵⁵, that shows that 93.29% (2011) and 92.40 (2021 – skewed downwards because of the Covid Pandemic) travelled over 2km to work, some 1,900 commuters who would tend to combine their journeys to support their family's retail needs.

The NPSG finds this subjective change unsustainable and even more fallacious when the *Draft Local Plan 2021-2040 (Regulation 18) Transport Background Paper, January 2024*⁵⁶, Four Marks congestion maps are taken into account.

However, this is the process that was used by EHDC to create the table below:

Tier	Settlement
Tier 1	Alton (including Holybourne)
Tier 2	Horndean, Liphook, Whitehill & Bordon (including Lindford)
Tier 3	Bentley, Clanfield, Four Marks (& South Medstead), Grayshott, Headley, Holt Pound, Rowlands Castle
Tier 4	Arford, Cathrington, Headley Down, Kingsley, Lovedean, Medstead, Ropley
Tier 5	Beech, Bentley Station, Bentworth, Bramshott, Griggs Green, Lasham, Lower Froyle, Oakhanger, Passfield Common, Ropley Dean, Shalden, Upper Froyle, Upper Wield

Accessibility Scores

With regards to the accessibility of the allocated sites in published Chapter 12 for Rowlands Castle and Four Marks /'South Medstead' it is noted that for:

Rowlands Castle sites

- RLC1 – Land at Deerleap (north) 006 - This site has a Ridge and Partners Transport Report 1 accessibility score of 17⁵⁷

⁵⁵ ONS Census Data 2011 and 2021 Distance of Travel to Work.
<https://www.ons.gov.uk/census>

⁵⁶ EHDC Portal: Draft Local Plan 2021-2040 (Regulation 18) Transport Background Paper January 2024, pages 64 to 67.
<https://www.easthants.gov.uk/media/8773/download?inline>

⁵⁷ Source of Data EHDC Portal: Draft Local Plan 2021 to 2028 Reg 18 Consultation. East Hampshire Living Locally Accessibility Study and Decide & Provide Methodology (Ridge Report 1)
 Chapter 5: Table 5.5 – Sites not within 400m of a Regular Bus Service Bus Stop or an LCWIP Scheme p53
<https://www.easthants.gov.uk/sites/default/files/2024-01/Report%201%20-%20accessibility%20study.pdf>

- RLC2 – Land at Deerleap (south) 007 - This site has a Ridge and Partners Transport Report 1 accessibility score of 18⁵⁸
- RLC3 – Land at Oaklands House 001 - This site has a Ridge and Partners Transport Report 1 accessibility score of 17⁵⁹
- RLC4 – Land at Little Leigh Farm 004 - This site has a Ridge and Partners Transport Report 1 accessibility score of 21⁶⁰

Four Marks/ 'South Medstead' sites

- **Four Marks**
 - FMS 2 Land Rear of 97 to 103 Blackberry Lane - This site has a Ridge and Partners Transport Report 1 accessibility score of 8⁶¹.
 - FMS3 Boundaries Surgery - This site is a medical site has a Ridge and Partners Transport Report 1 accessibility score of 21⁶².
 - FMS4 Land South of Winchester Road - This site has a Ridge and Partners Transport Report 1 accessibility score of 11⁶³.
 - FMS5 Land at Fordlands, Brislands Lane - This site has a Ridge and Partners Transport Report 1 accessibility score of 10⁶⁴.

⁵⁸ Source of Data EHDC Portal: Draft Local Plan 2021 to 2028 Reg 18 Consultation. East Hampshire Living Locally Accessibility Study and Decide & Provide Methodology (Ridge Report 1)

Chapter 5: Table 5.5 – Sites not within 400m of a Regular Bus Service Bus Stop or an LCWIP Scheme p53

<https://www.easthants.gov.uk/sites/default/files/2024-01/Report%201%20-%20accessibility%20study.pdf>

⁵⁹ Source of Data EHDC Portal: Draft Local Plan 2021 to 2028 Reg 18 Consultation. East Hampshire Living Locally Accessibility Study and Decide & Provide Methodology (Ridge Report 1)

Chapter 5: Table 5.5 – Sites not within 400m of a Regular Bus Service Bus Stop or an LCWIP Scheme p53

<https://www.easthants.gov.uk/sites/default/files/2024-01/Report%201%20-%20accessibility%20study.pdf>

⁶⁰ Source of Data EHDC Portal: Draft Local Plan 2021 to 2028 Reg 18 Consultation. East Hampshire Living Locally Accessibility Study and Decide & Provide Methodology (Ridge Report 1)

Chapter 5: Table 5.4 – Sites within 400m of a Regular Bus Service Bus Stop or an LCWIP Scheme p53

⁶¹ Source of Data EHDC Portal: Draft Local Plan 2021 to 2028 Reg 18 Consultation. East Hampshire Living Locally Accessibility Study and Decide & Provide Methodology (Ridge Report 1)

Chapter 5: Table 5.5 – Sites not within 400m of a Regular Bus Service Bus Stop or an LCWIP Scheme p53

<https://www.easthants.gov.uk/sites/default/files/2024-01/Report%201%20-%20accessibility%20study.pdf>

⁶² Source of Data EHDC Portal: Draft Local Plan 2021 to 2028 Reg 18 Consultation. East Hampshire Living Locally Accessibility Study and Decide & Provide Methodology (Ridge Report 1)

Appendix D Accessibility Study Results (SHLAA) p106

<https://www.easthants.gov.uk/sites/default/files/2024-01/Report%201%20-%20accessibility%20study.pdf>

⁶³ Source of Data EHDC Portal: Draft Local Plan 2021 to 2028 Reg 18 Consultation. East Hampshire Living Locally Accessibility Study and Decide & Provide Methodology (Ridge Report 1)

Chapter 5: Table 5.4 – Sites within 400m of a Regular Bus Service Bus Stop or an LCWIP Scheme p53

<https://www.easthants.gov.uk/sites/default/files/2024-01/Report%201%20-%20accessibility%20study.pdf>

⁶⁴ Source of Data EHDC Portal: Draft Local Plan 2021 to 2028 Reg 18 Consultation. Ridge Transport Report 1 Chapter 5: Table 5.5 – Sites not within 400m of a Regular Bus Service Bus Stop or an LCWIP Scheme p53

<https://www.easthants.gov.uk/sites/default/files/2024-01/Report%201%20-%20accessibility%20study.pdf>

- **'South Medstead'**
 - FMS 1 Land West of Lymington Barns This site has a Ridge and Partners Transport Report 1 accessibility score of 8⁶⁵.

Considering the settlement scores, for Rowland Castle the mean score is 13.97; and Four Marks/'South Medstead' the mean score is 13.92, it could be considered that the settlements are of equal worth, but when you compare them with the mean score for Headley at mean score 15.6 there is a marked discrepancy between the lowest Tier 3 and highest Tier 4 Settlement scores.

If you look at the accessibility scores for the Headley sites it is noticed that they are:

- HDN1 – Land at Woodcroft Farm 024 - This site has a Ridge and Partners Transport Report 1 accessibility score of 15⁶⁶
- HDN2 – Land south of Five Heads Road 004 - This site has a Ridge and Partners Transport Report 1 accessibility score of 17⁶⁷
- HDN3 – Land north of Chalk Hill Road 008 - This site has a Ridge and Partners Transport Report 1 accessibility score of 24⁶⁸

It is noticeable that the accessibility scores for Headley and Rowlands Castle are of the same order, 15, 17 and 24 against 17, 18 and 17, ; whilst those for whilst those for the Four Marks/'South Medstead' sites are 8, 11, 10 and 8.

From this data, moving Rowlands Castle to Tier 3 appears a logical move, but with mobility data the proposed sites in Four Marks/'South Medstead' being similar to Medstead, Kingsley Arlford and Bramshott, there is a strong argument on retaining Four Marks/'South Medstead' in Tier 4.

This argument is strengthened when taking into account the 'passing trade', generated on the A31 as demonstrated in the *Draft Local Plan 2021-2040*

(Regulation 18) Transport Background Paper, January 2024 ⁶⁹, regarding traffic congestion on the A31 in the village.

⁶⁵ Source of Data EHDC Portal: *Draft Local Plan 2021 to 2028 Reg 18 Consultation. East Hampshire Living Locally Accessibility Study and Decide & Provide Methodology (Ridge Report 1)*

Chapter 5: Table 5.4 – Sites within 400m of a Regular Bus Service Bus Stop or an LCWIP Scheme p53

<https://www.easthants.gov.uk/sites/default/files/2024-01/Report%201%20-%20accessibility%20study.pdf>

⁶⁶ Source of Data EHDC Portal: *Draft Local Plan 2021 to 2028 Reg 18 Consultation. East Hampshire Living Locally Accessibility Study and Decide & Provide Methodology (Ridge Report 1)*

Chapter 5: Table 5.5 – Sites not within 400m of a Regular Bus Service Bus Stop or an LCWIP Scheme p53

<https://www.easthants.gov.uk/sites/default/files/2024-01/Report%201%20-%20accessibility%20study.pdf>

⁶⁷ Source of Data EHDC Portal: *Draft Local Plan 2021 to 2028 Reg 18 Consultation. East Hampshire Living Locally Accessibility Study and Decide & Provide Methodology (Ridge Report 1)*

Chapter 5: Table 5.5 – Sites not within 400m of a Regular Bus Service Bus Stop or an LCWIP Scheme p53

<https://www.easthants.gov.uk/sites/default/files/2024-01/Report%201%20-%20accessibility%20study.pdf>

⁶⁸ Source of Data EHDC Portal: *Draft Local Plan 2021 to 2028 Reg 18 Consultation. East Hampshire Living Locally Accessibility Study and Decide & Provide Methodology (Ridge Report 1)*

Chapter 5: Table 5.5 – Sites not within 400m of a Regular Bus Service Bus Stop or an LCWIP Scheme p53

<https://www.easthants.gov.uk/sites/default/files/2024-01/Report%201%20-%20accessibility%20study.pdf>

⁶⁹ EHDC Portal: *Draft Local Plan 2021-2040 (Regulation 18) Transport Background Paper January 2024*, pages 64 to 67.

<https://www.easthants.gov.uk/media/8773/download?inline>

Paragraph 4 108 notes:

'The A31 running through the middle of Four Marks also becomes more congested, specifically in the vicinity of the main shops and services in the centre of the settlement, with congestion remaining into the evening period of 17:30. Congestion eases on the adjoining roads to the A31 in the evening period.'

This is particularly noticeable when looking at the figures generated using Google maps, found in the associated NPSG Paper **Other Documents Chapter 13, Section 6:**

- *Figure 4.48: Four Marks highway congestion, average Thursday 08:30.*
- *Figure 4.49: Four Marks highway congestion, average Thursday 09:45*
- *Figure 4.50: Four Marks highway congestion, average Thursday 12:00*
- *Figure 4.51: Four Marks highway congestion, average Thursday 17:30*

The extent of the traffic flow can be clearly seen with the greatest density and length of slow moving traffic, particularly at 12.00.

This 'passing trade', and its effect on the stability of the retail outlets, had not been taken into account in the *EHDC Settlement Hierarchy Paper*, and is more likely to support Four Marks/ 'South Medstead, who are evidenced to be using the Alton retail offering as evidenced in the *East Hampshire Retail and Main Town Centre Uses Study Final Report and East Hampshire Retail & Leisure Study for Lichfields, August 2018*⁷⁰ used in the EHDC Draft Local Plan Regulation 18-1) Consultation in 2022, used in the EHDC Draft Local Plan Regulation 18-1) Consultation in 2022, used in the EHDC Draft Local Plan Regulation 18-1) Consultation in 2022.

⁷⁰ EHDC Portal -East Hampshire Retail and Main Town Centre Uses Study Final Report
<https://www.easthants.gov.uk/media/5114/download?inline>

East Hampshire Retail & Leisure Study for Lichfields August 2018
<https://www.easthants.gov.uk/media/5111/download?inline>

13.6 Transport Background Paper

The background paper builds on:

- Hampshire Local Transport Plan
- Hampshire Local Transport Plan
- East Hampshire Local Cycling and Walking Infrastructure Plan (LCWIP), 2020
- Gear Change: A bold vision for cycling and walking, Department for Transport
- Bus Back Better – National Bus Strategy for England
- The Plan for Drivers

It notes that 43% of the EHDC District CO₂ emissions are from Transport and also *'Within the transport sector, the vast majority of emissions is associated with road transport on A-roads and minor roads.'*

The NPSG notes the aspiration to support a future EV Charging network in new developments. The report note:

'The A31 bisects north-east to south-west of the northern area of the district, facilitating road travel from neighbouring planning authorities of Waverley and Winchester, whilst tracking south of the district's largest settlement, Alton.'

It notes the District rail connections but check Petersfield London trains

It notes only 8 long distance bus services in District and that long distance cycle paths 224 and 23 are not suitable for commuting

Long distance walking network

LCWIP

'The East Hampshire LCWIP provides suggested improvements to the existing cycling and walking network in the district. The aim of an LCWIP is to encourage greater participation in the active travel modes for a range of purposes, by identifying improvements and schemes that benefits the modes. The suggested improvements consist of a range of scheme proposals, from small scale "quick wins" to more longer-term infrastructure improvements that require funding streams. The suggested LCWIP improvements will enable the creation of priority routes and identify where existing missing connections, as well as supporting infrastructure is required to aid greater amounts of cycling and walking in the district.'

Inflow of commuting not many M & FM residents work at industrial estates in the Parish. When considering Four Marks the report notes:

- 4.104. Four Marks is a settlement located approximately five miles to the south-west of Alton. It is a *linear settlement that has developed around the A31, an integral part of the local road network in the northern area of East Hampshire. Medstead is the settlement located in the closest proximity, to the north of Four Marks with the northern area between Four Marks and Medstead known as South Medstead.*
- 4.105. *A number of local roads connect to the A31 to provide local traffic to travel to surrounding residential areas, predominantly north and south of the A31. Lymington Bottom Road and Boyneswood Road adjoin the north of the A31 and connect to South Medstead and Medstead, whilst Telegraph Lane and Lymington Bottom facilitate travel to southern Four Marks. There are two local pinch points on the local road network in Four Marks, these being: Lymington Bottom Road, where the road passes under the Watercress railway line, a single carriageway controlled by priority shuttle junction; and Boyneswood*

Road is also single carriageway when passing over the Watercress railway line controlled by priority shuttle junction.

- 4.106. It should be noted that Four Marks Primary School is not located near the settlement's main services and facilities around the A31, but instead to the southwest of the settlement accessed via Lymington Bottom. Figures 4.48 to 4.51 display the observed highway conditions for an average Thursday between 08:30 and 17:30 in Four Marks.
- 4.107. In the average weekday morning at 08:30, no congestion is observed on the A31 but instead it is present on the adjoining roads of Boyneswood Road, Telegraph Lane, Lymington Bottom and Lymington Bottom Road all in the direction of travel inbound to the junctions with the A31. Congestion is also present on Boyneswood Road and Lymington Bottom Road northbound from the junctions of the A31 north towards South Medstead and in proximity to the aforementioned single carriageway priority shuttle junctions. During the later morning and midday of an average Thursday, congestion remains on the adjoining side roads of the A31, but with congestion covering a greater distance of Telegraph Lane and Lymington Bottom Road. It is observed that Four Marks has three existing junctions that can generate "hotspots" for traffic, these being:
- A31 junction with Lymington Bottom Road – priority junction;
 - A31 junction with Boyneswood Road – priority junction;
 - A31 junction with Telegraph Lane - priority junction; and
 - A31 junction with Lymington Bottom – priority junction.
- 4.108. The A31 running through the middle of Four Marks also becomes more congested, specifically in the vicinity of the main shops and services in the centre of the settlement, with congestion remaining into the evening period of 17:30. Congestion eases on the adjoining roads to the A31 in the evening period.

Google Maps data shows:

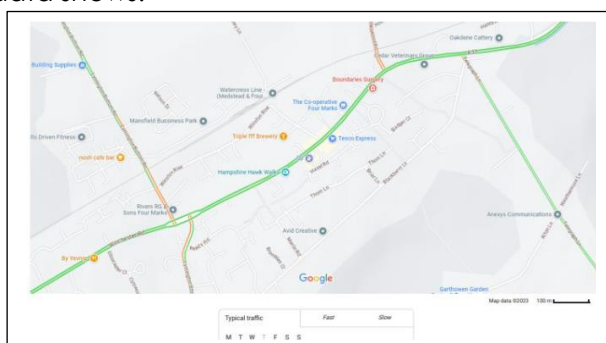


Figure 4.48: Four Marks highway congestion, average Thursday 08:30

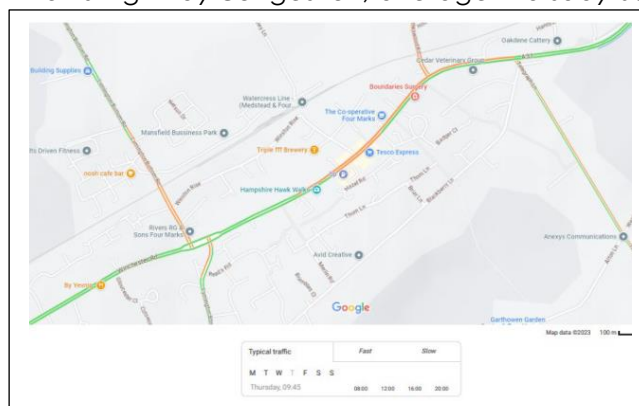


Figure 4.49: Four Marks highway congestion, average Thursday 09:45

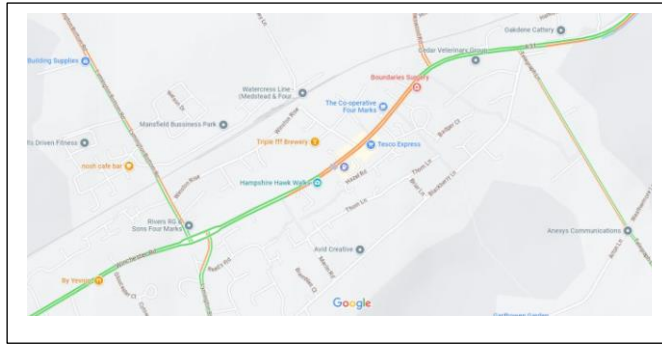


Figure 4.50: Four Marks highway congestion, average Thursday 12:00

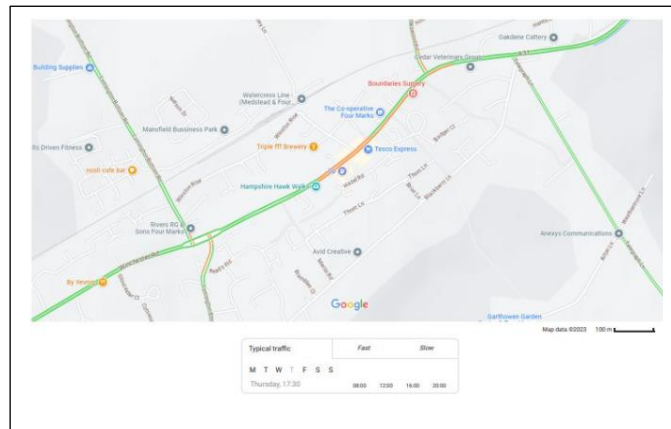


Figure 4.51: Four Marks highway congestion, average Thursday 17:30

4.109. Figure 4.52 indicates the location of proposed future residential site allocations in Four Marks as part of the draft East Hampshire Local Plan 2021-2040.

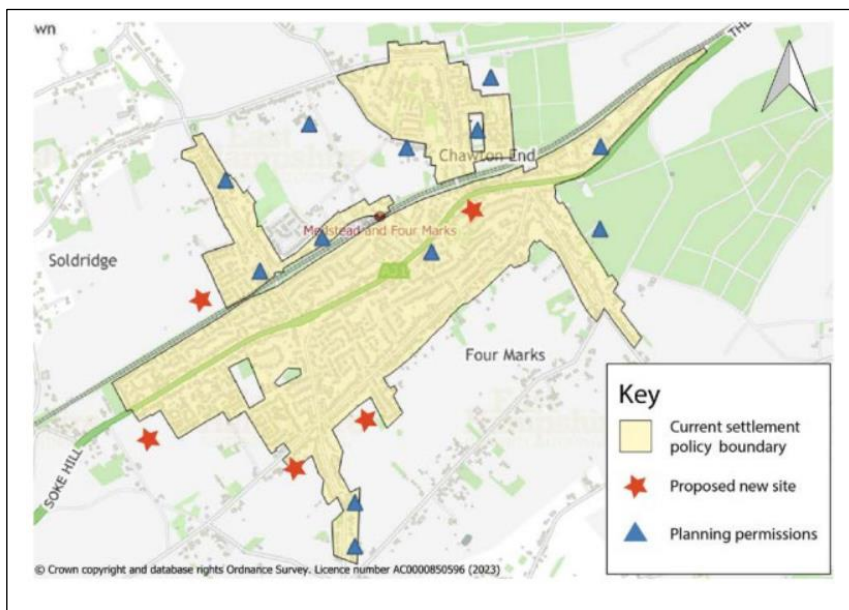


Figure 4.52: Location of proposed housing sites and outstanding permissions in Four Marks

4.110. Four Marks is allocated three proposed residential sites:

- Land west of Lymington Barn, located west of Lymington Bottom Road – 90 homes;
- Land rear of 97-103 Blackberry Lane, located east of Lymington Bottom – 20 homes; and
- Land south of Winchester Road, located between A31 and Brislands Lane – 100 homes.

Figure 4.52: Location of proposed housing sites and outstanding permissions in Four Marks

4.111. In addition to the above proposed residential allocations, Four Marks is also allocated an infrastructure proposal of an extension to the existing Boundaries GP surgery and two traveller pitches east of Lymington Bottom.

4.112. It is likely that the proposed residential allocations of Land west of Lymington Bottom Road and Land south of Winchester Road are to have the greatest impacts on existing highway conditions in Four Marks as these are the largest quantum of proposed homes. At this point in time the proposed access to Land south of Winchester Road is unknown but the possibilities are either onto the A31 via Barn Lane or via the neighbouring development accessed via Pheasant Way/Goldcrest Way again onto the A31. The access of the proposed development needs to be considered both in terms of exacerbating any existing congestion on the A31 but also safety. The Land west of Lymington Barn development could exacerbate existing congestion and delay on Lymington Bottom Road passing through the priority shuttle junction under the railway bridge, but also at the junction with the A31. Investigation into the developments proposed highway impacts will need to occur to understand in any mitigation is required, specifically to the junctions on and adjoining Lymington Bottom Road, as well as Four Marks and beyond. The districts cumulative highway Transport Assessment for Regulation 19 will be a useful tool of understanding potential impacts from development in Four Marks.'

The Report does not address the Pollution issues through Four Marks/ 'South Medstead'.

'Ridge & Partners initially conducted research into the 20-minute neighbourhood concept with a specific focus on how it might be applied to rural settlements. Case studies and experiences in other rural communities were considered. The research and evidence concluded that a 20-minute neighbourhood concept should be applied to East Hampshire because living locally could help to maximise achievement of the Council's priorities during the Local Plan time period. Research and evidence also revealed that 10-minutes is generally the threshold time period that people are willing to walk to a destination, in order to access services. This was found to relate particularly to rural areas, as it is evidenced that people walk less and have less willingness to walk further. It was therefore recommended that EHDC utilise the 20- minute neighbourhood concept based on reaching a destination within 10-minutes i.e. a 20-minute round trip.'

There appears to be an error in paragraph 6.16.

'Other settlements in the north of the district that have high accessibility scores are Four Marks and South Medstead, Bentley and Holt Pound. **The area surrounding the local shopping parade on the A31 in Four Marks has scores ranging from 14.9 to 21.4**, with other areas of the settlement also scoring higher than the district's median. Bentley benefits from a mainline train station as well as some local services within the village, thus causing the settlement to have a range of accessibility scores from 8.2 to 17.7. Holt Pound is located on the district boundary with Waverley, with the neighbouring

facilities and services being taken into consideration of the study, allowing Holt Pounds accessibility to be rated as 17.9 on the eastern side of the settlement.'

For Four Marks, the lowest score is 8.2 and the highest.21.9

Road Safety

'Due to the rural nature of East Hampshire several roads in the district can place a higher risk to users by narrow carriageways, lack of street-lighting and narrow/lack of pedestrian footpaths.

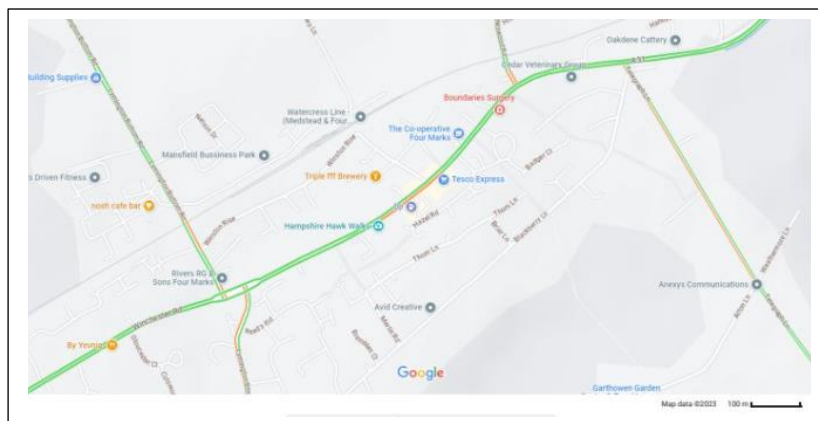
7.3 As evidenced in the district's current LCWIP (2020) there can be a lack of pedestrian footpaths and designated cycleways, particularly in the more rural parts of the district. This has been acknowledged in a number of locations, in conjunction with Hampshire County Council, and suitable schemes are being, or have been, designed to tackle these known issues. For example, Four Marks Primary School is located a distance from the centre of the settlement and is adjacent to a busy junction of five adjoining roads, known as Five Lanes. Due to the school's distance from the settlement and lack of safe and suitable pedestrian footpaths in its vicinity, the school travel survey revealed a large number of pupils are being driven to school. To encourage greater amounts of walking and scooting, Hampshire County Council are finalising the most suitable package of schemes to provide new pedestrian footpaths that route between the centre of the settlement to the school, funded by S106 monies, with the project being known as Four Marks Safer Routes to School. Figure 7.1 displays the Five Lanes junction outside of Four Marks Primary School.'

The RTA data only covers the Public Highways network, No data available for private estates, fatality on A31 to east of settlement at road speed limit change

Congestion maps

Four Maps

Average Monday Congestion (in red)

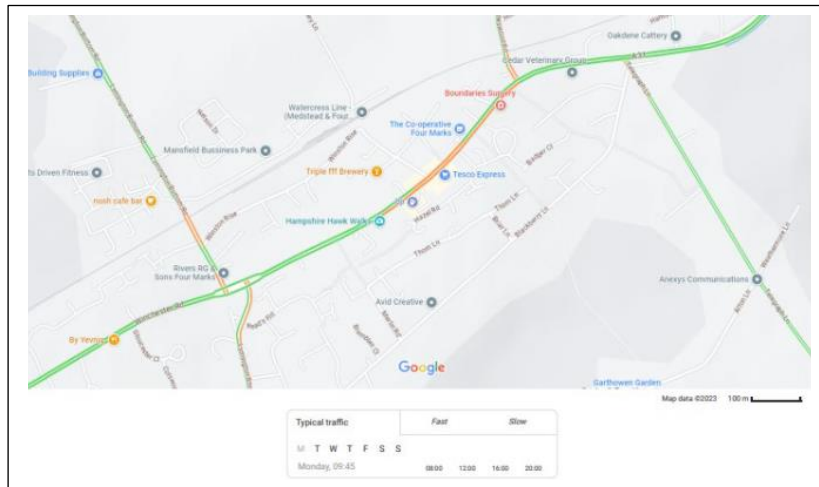


Average Monday 08:30

Congestion is shown at the following locations:

- Winchester Road (A31) - Westbound (260 m from Tesco Express)
- Telegraph Lane Northbound (650 m Alton Lane Junction to the A31)
- Boyneswood Road Northbound (60 m from A31 Junction), and Southbound (60 m from A31 Junction),
- Lymington Bottom Northbound (260 m A31 Junction from Lymington Rise),
- Lymington Bottom Road Southbound (60 m A31 Junction from Lymington Close),

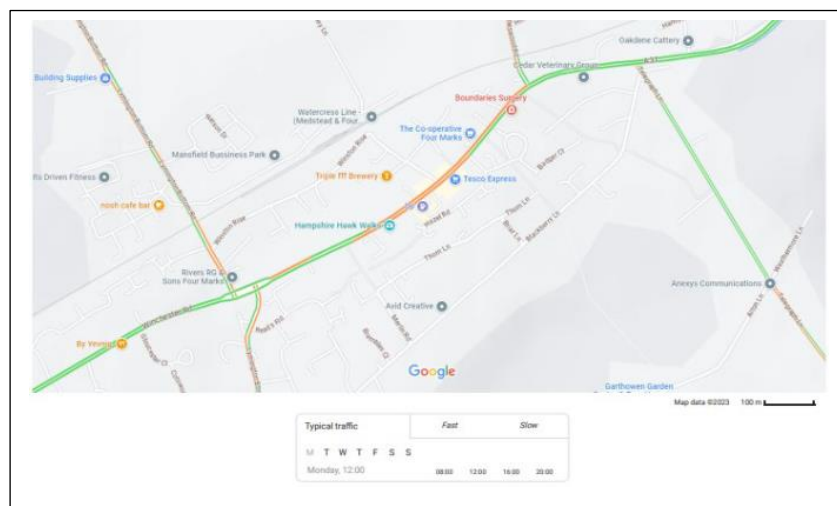
- Lymington Bottom Road railway bridge Northbound (75 m Bridge from Winston Rise) and Southbound (175 m Bridge from Ivatt Way)



Average Monday 09:45

Congestion is shown at the following locations:

- Winchester Road (A31) - Westbound (500 m from Boyneswood Road) and Eastbound (200 m west to Tesco express)
- Telegraph Lane Northbound (140 m south of junction to the A31)
- Boyneswood Road Northbound (60 m from A31 Junction), and Southbound (60 m A31 from Holland Drive),
- Lymington Bottom Northbound (260 m A31 Junction from Lymington Rise),
- Lymington Bottom Road Southbound (60 m A31 Junction from Lymington Close), and Northbound (120 m A31 Junction from Winston Rise),
- Lymington Bottom Road railway bridge Northbound (75 m Bridge from Winston Rise) and Southbound (175 m Bridge from Ivatt Way)

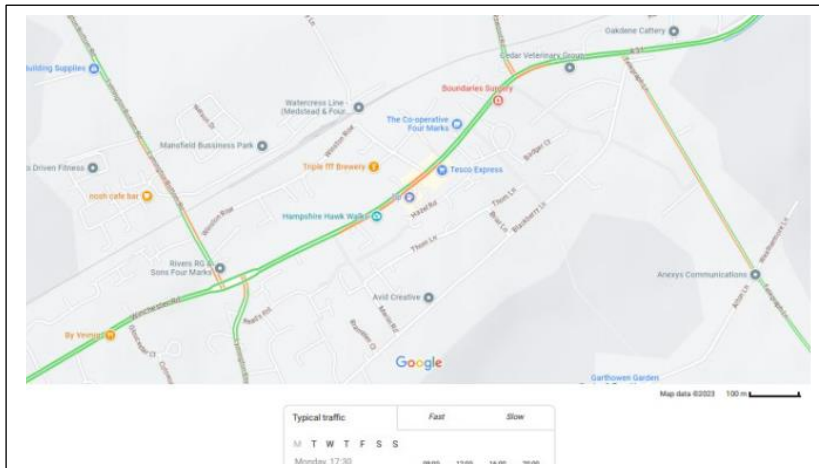


Average Monday 12:00

Congestion is shown at the following locations:

- Winchester Road (A31) - Westbound (500 m from Boyneswood Road) and Eastbound (200 m west to Tesco express)
- Telegraph Lane - Northbound (140 m south of junction to the A31)

- Boyneswood Road - Northbound (60 m from A31 Junction), and Southbound (160 m A31 from Holland Drive),
- Lymington Bottom - Northbound (260 m A31 Junction from Lymington Rise),
- Lymington Bottom Road - Southbound (60 m A31 Junction from Lymington Close), and Northbound (60 m A31 Junction from Lymington Close),
- Lymington Bottom Road railway bridge - Northbound (75 m Bridge from Winston Rise) and Southbound (175 m Bridge from Ivatt Way)

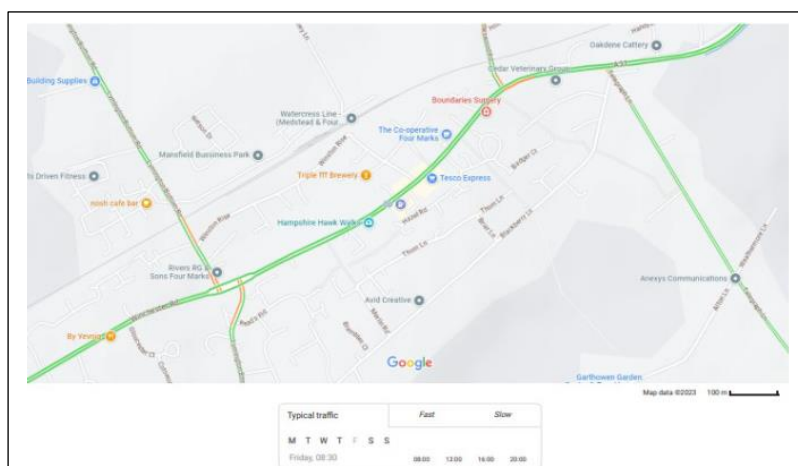


Average Monday 17:30

Congestion is shown at the following locations:

- Winchester Road (A31) - Westbound (500 m from Boyneswood Road, 75 m west of Boyneswood Road from Charters Close) and Eastbound (100 m west to Tesco express)
- Telegraph Lane - Northbound (500 m south of junction to the A31)
- Boyneswood Road Northbound (60 m from A31 Junction), and Southbound (100 m A31 from Holland Drive),
- Lymington Bottom - Northbound (100 m A31 Junction from War Memorial),
- Lymington Bottom Road - Southbound (60 m A31 Junction from Lymington Close), and Northbound (60 m A31 Junction from Lymington Close),
- Lymington Bottom Road railway bridge - Northbound (75 m Bridge from Winston Rise) and Southbound (175 m Bridge from Ivatt Way)

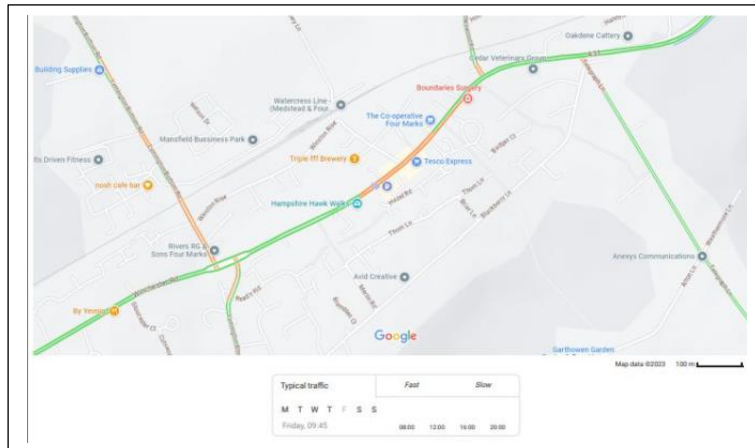
Average Friday Congestion (in red)



Average Friday 08:30

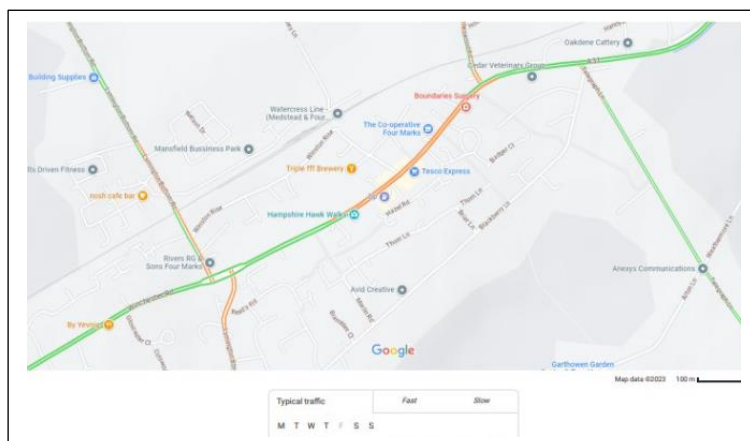
Congestion is shown at the following locations:

- Winchester Road (A31) - Westbound (75 m west of Boyneswood Road from Charters Close)
- Boyneswood Road - Southbound (60 m A31 from Holland Drive),
- Lymington Bottom - Northbound (100 m A31 Junction from Reads Field),
- Lymington Bottom Road - Southbound (60 m A31 Junction Lymington Close)
- Lymington Bottom Road railway bridge - Southbound (175 m Bridge from Ivatt Way)



Average Friday 09:45

- Winchester Road (A31) - Westbound (500 m from Boyneswood Road) and Eastbound (200 m west to Tesco express)
- Telegraph Lane - Northbound (140 m south of junction to the A31)
- Boyneswood Road - Northbound (60 m from A31 Junction), and Southbound (60 m from A31 junction),
- Lymington Bottom - Northbound (100 m A31 Junction from Reads Field),
- Lymington Bottom Road - Southbound (210 m A31 Junction from bridge), and Northbound (210 m bridge from A31 Junction),
- Lymington Bottom Road railway bridge - Northbound (200 m bridge from A31 Junction) and Southbound (450 m Bridge from Kingsley Drive).

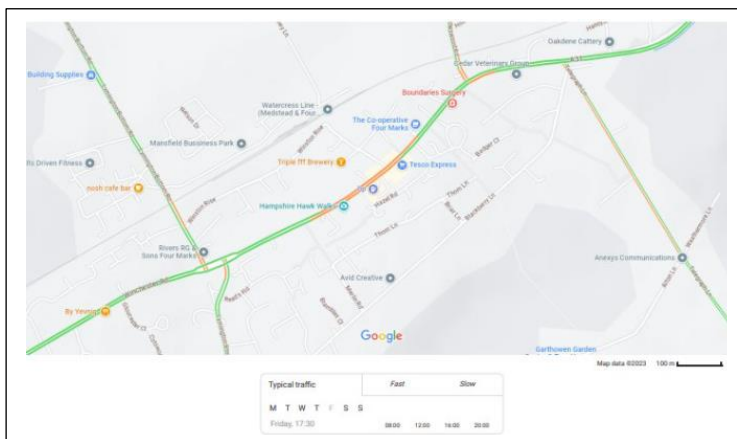


Average Friday 12:00

Congestion is shown at the following locations:

- Winchester Road (A31) - Westbound (650m from Charters Close,) and Eastbound (520 m west of Boundaries Surgery)
- Telegraph Lane - Northbound (140m south of junction to the A31)

- Boyneswood Road Northbound (120 m from A31 Junction), and Southbound (120 m A31 from Holland Drive),
- Lymington Bottom - Northbound (50 m A31 Junction From War Memorial),
- Lymington Bottom Road - Southbound (60 m A31 Junction from Lymington Close), and Northbound (60 m A31 Junction from Lymington Close),
- Lymington Bottom Road railway bridge - Northbound (75 m Bridge from Winston Rise) and Southbound (100 m Bridge from Watercress Surgery and Bridge to 75m to Winston Rise)

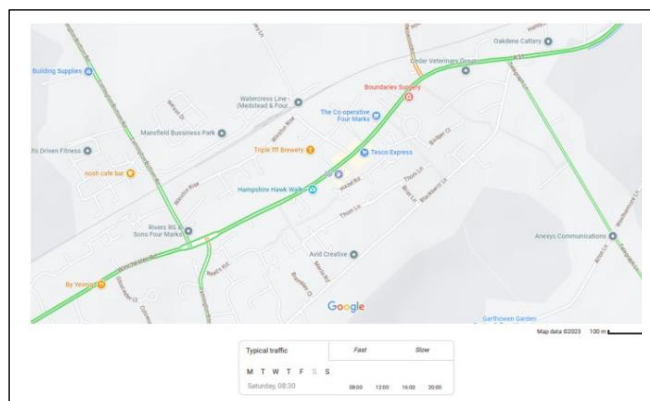


Average Friday 17:30

Congestion is shown at the following locations:

- Winchester Road (A31) - Westbound (310 m from Tesco Express) and Eastbound (390 m west of Coop)
- Telegraph Lane - Northbound (650 Alton Lane Junction to the A31)
- Boyneswood Road Northbound (120 m from A31 Junction), and Southbound (120 m A31 from Holland Drive),
- Lymington Bottom - Northbound (50 m A31 Junction from War Memorial),
- Lymington Bottom Road - Southbound (60 m A31 Junction from Lymington Close), and Northbound (60 m A31 Junction from Lymington Close),
- Lymington Bottom Road railway bridge - Northbound (75 m Bridge from Winston Rise) and Southbound (50 m from Bridge plus Bridge to 75m to Winston Rise)

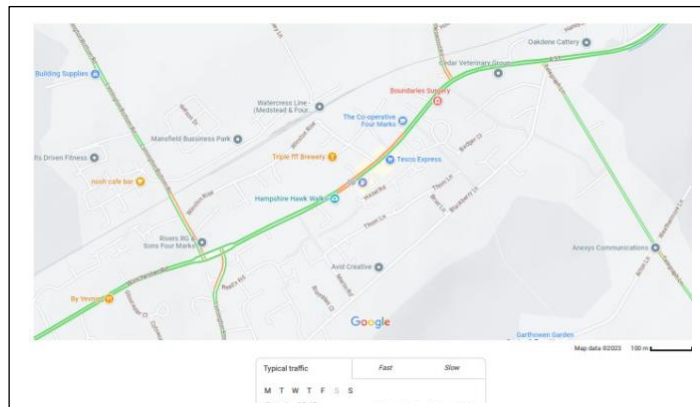
Average Saturday Congestion (in red)



Average Saturday 08:30

Congestion is shown at the following locations:

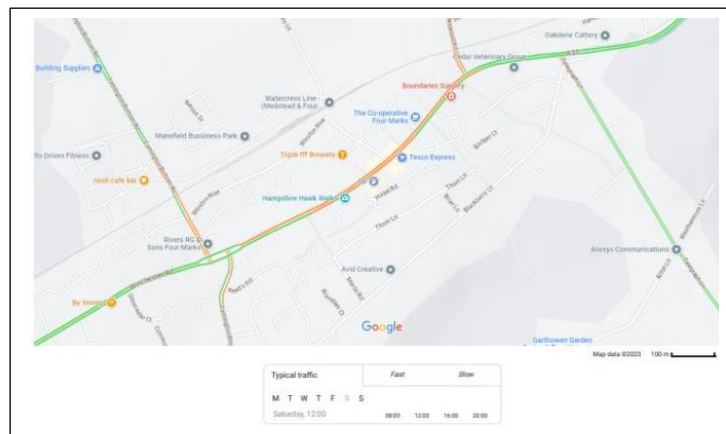
- Boyneswood Road - Northbound (120 m from A31 Junction), and Southbound (120 m A31 from Holland Drive).



Average Saturday 09:45

Congestion is shown at the following locations:

- Winchester Road (A31) - Westbound (50 m from BP Garage) and Eastbound (300 m west of Coop)
- Boyneswood Road - Northbound (60 m from A31 Junction), and Southbound (60 m from A31 Junction),
- Lymington Bottom - Northbound (150 m A31 Junction from St Faiths Close),
- Lymington Bottom Road- Southbound (60 m A31 Junction from Lymington Close), and Northbound (180 m A31 Junction from Tawny Grove),
- Lymington Bottom Road railway bridge - Northbound (200 m Bridge from A31 junction) and Southbound (50 m from Bridge and Bridge to 75m to Winston Rise)

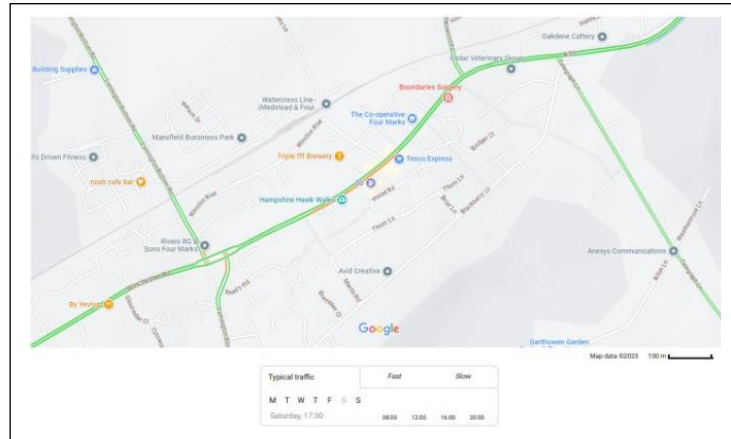


Average Saturday 12:00

Congestion is shown at the following locations:

- Winchester Road (A31) - Westbound (400 m from Hazel Road, and 75 m west of Boyneswood Road from Charters Close) and Eastbound (850 m between Lymington Bottom and Boyneswood Road)
- Boyneswood Road - Northbound (120 m from A31 Junction), and Southbound (120 m A31 from Holland Drive)
- Lymington Bottom - Northbound (150 m A31 Junction from St Faiths Close),

- Lymington Bottom Road - Southbound (60 m A31 Junction from Lymington Close), and Northbound (120 m A31 Junction from Tawny Grove),
- Lymington Bottom Road railway bridge - Northbound ((175 m Bridge from Ivatt Way)) and Southbound (50 m from Bridge and Bridge to 75m to Winston Rise).



Average Saturday 17:30

Congestion is shown at the following locations:

- Winchester Road (A31) - Westbound (310 m from Tesco Express).
- Lymington Bottom - Northbound (50 m A31 Junction from the War Memoria),
- Lymington Bottom Road - Southbound (40 m A31 Junction from Rivers boundary).

The EHDC Transport indicates that there is significant road traffic passing through the Four Marks /'South Medstead' settlement to cause disruption to residents in their homes and those who during the day need to use either the bus or private transport to come and go to the village, both during the working week and at weekends.

13.7 EHDC Local Cycle and Walking Infrastructure Plan Technical Report (LCWIP)

On the HCC Strategic transport - plans and policies, Local Cycling and Walking Infrastructure Plan website⁷¹ it is noted that

‘East Hampshire District Council (EHDC) commissioned Witteveen+Bos UK Limited to develop an LCWIP⁷² for the District. A public consultation has been undertaken by EHDC and potential schemes identified. EHDC plan to work with Hampshire County Council (Hampshire Services) to prioritise identified schemes.’

This 2020 document is notes

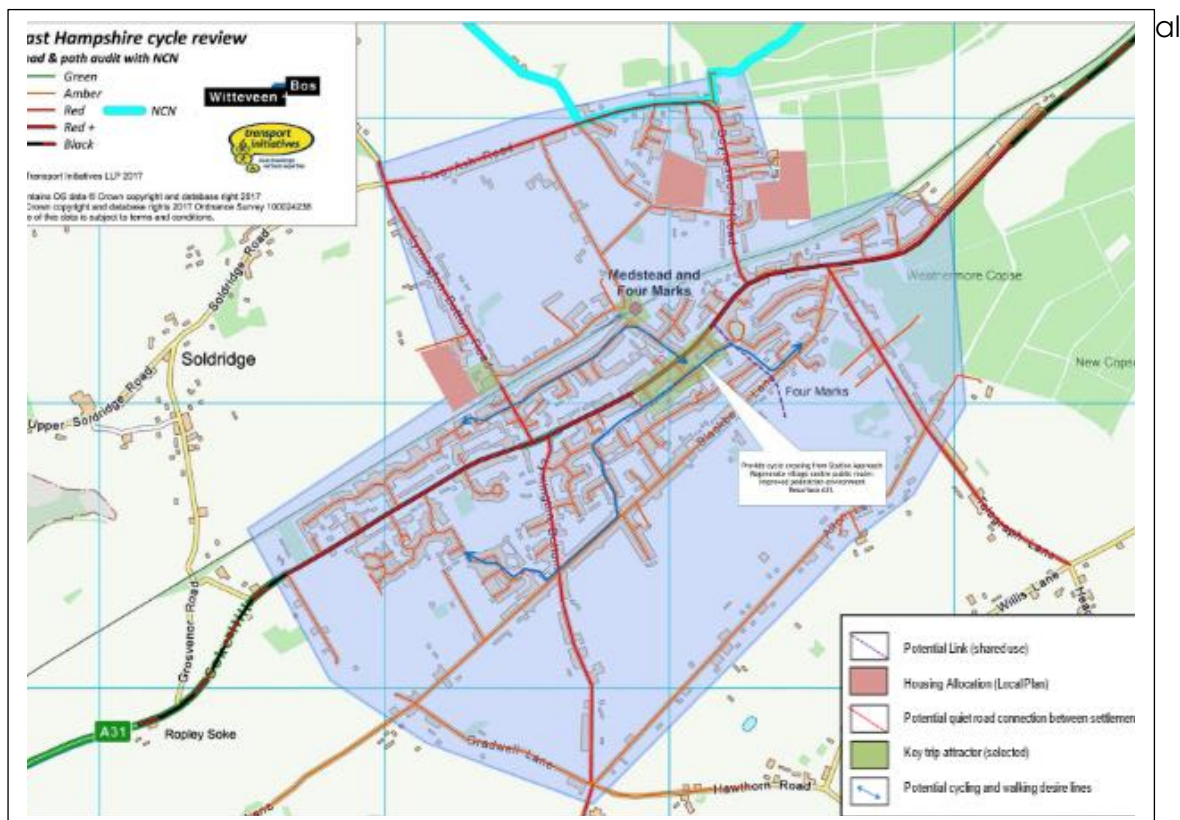
Within 4.3

‘For the hillier rural areas, levels of cycling are consistently low, not exceeding 2 % of trips. In some areas there is likely to be no cycling at all. The main areas of cycle travel demand are to the north and east of the District, broadly in line with the main settlement distribution and flatter terrain. Again, this picture may change significantly with widespread uptake of electrically assisted cycles.’

In our particular area in the NW of the District

It proposes changes Four Marks:

Desktop bikeability appraisal including key trip attractors, desire lines and potential interventions.



⁷¹ HCC Strategic transport - plans and policies Local Cycling and Walking Infrastructure Plan
<https://www.hants.gov.uk/transport/strategies/transportstrategies>

⁷² EHDC: LCWIP Technical Report v1.2, Witteveen+Bos UK, August 2020
<https://www.easthants.gov.uk/media/6035/download?inline>

Note: The 'white panel states:

- Provide cycle crossing from Station Approach.
- Regenerate village centre in public realm:
 - Improve pedestrian environment
 - Resurface A31

Table 5.42 Four Marks: proposed approaches

Ref	Suggested solution	Price
Mar1	Village-wide 20mph.	£ 15k
Mar2	Cycle crossing at Station Approach; or Widen parallel footpath and upgrade existing pelican crossing to toucan (proposed in 2004 Cycle Plan).	£ 50k
Mar3	Consider public realm improvements to regenerate village centre and services.	£ 500k-£ 1m
Mar4	Sinusoidal humps each where required to reduce speeds.	£ 10k
Mar5	Footpath widening /surfacing as required to deliver links.	£ 30 m ²
Mar6	Stoney Lane and Boyneswood Lane (bridleway): upgrade loose gravel surface to rolled scalpings (proposed in 2004 Cycle Plan).	£ 15 m ²
Mar7	Route from Four Marks to Ropley (and Alresford) via Brislands Lane incorporating short section of shared use path alongside A31 (proposed in 2004 Cycle Plan) - assumes low volume of pedestrians.	£ 120,000 per km

Table 5.43 Cycle parking

- Provide Sheffield stands evenly distributed in the village centre.	Sheffield stand £ 200 including installation.
- Provide covered Sheffield stands at schools and prominent cycle parking for school visitors.	
- Require new development to provide covered cycle parking taking the form of in-curtilage storage units, or on-street residential 'hangars' for shared use.	Cycle storage units in the region of £5,000 to £ 10,000 depending on capacity.
- All cycle parking provision should dedicate a minimum of one, or 5 % of the total to non-standard cycles and cycles used by disabled people. A permit system may be appropriate if signing alone proves insufficient.	
- Provide covered cycle parking at key bus stops.	Cycle 'hangars' in the region of £ 5000 per unit however residents pay a fee for continued maintenance.

Fig 9 East Hampshire District rural network showing existing and potential routes with further highlighting for future investment.

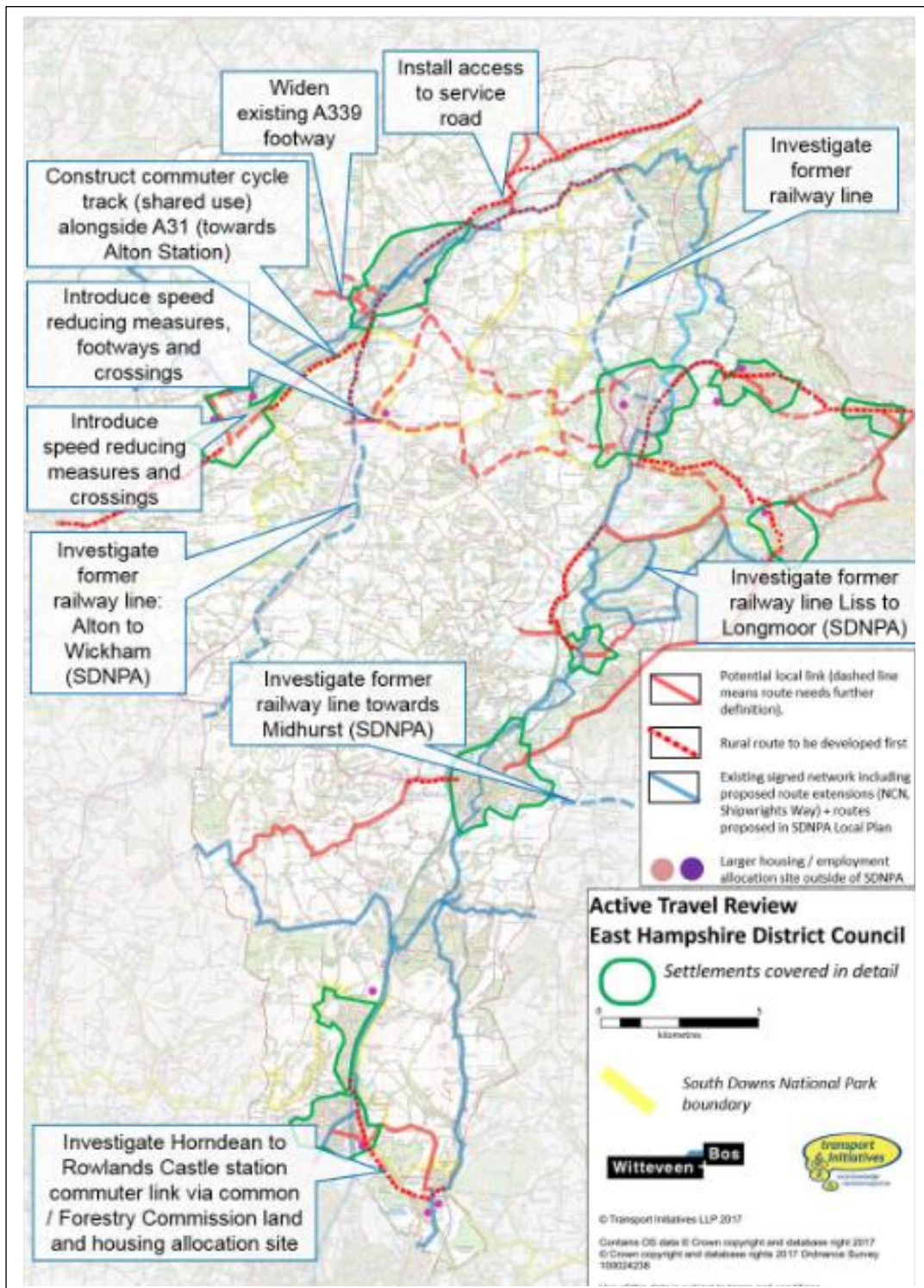


Table 5.44 Stakeholder comments

Ref	Stakeholder comment	Response	Cost / notes
	Need for a commuter link between Four Marks and Alton Station.	Indicative route shown on rural network map Figure 5.9.	See table 5.66, item RurS8 in Rural Village chapter.

At the EHDC Teams meeting with Parish Councillors, it was intimated that HCC was updating its Local Cycling and Walking Infrastructure Plan, which on interrogation does not appear to be referenced on its website, although clarification has been received from EHDC officers that the new Plan is expected before the Reg 19 stage of the DLP.

It is noted the HCC Strategic transport - plans and policies, Local Cycling and Walking Infrastructure Plan website⁷³ that

'East Hampshire District Council (EHDC) commissioned Witteveen+Bos UK Limited to develop an LCWIP⁷⁴ for the District. A public consultation has been undertaken by EHDC and potential schemes identified. EHDC plan to work with Hampshire County Council (Hampshire Services) to prioritise identified schemes.'

This 2020 document is notes

Within 4.3

'For the hillier rural areas, levels of cycling are consistently low, not exceeding 2 % of trips. In some areas there is likely to be no cycling at all. The main areas of cycle travel demand are to the north and east of the District, broadly in line with the main settlement distribution and flatter terrain. Again, this picture may change significantly with widespread uptake of electrically assisted cycles.'

In our particular area in the NW of the District

It proposes changes Four Marks

- Village-wide 20mph. The NPSG observed that some of the key safety suggestions can never be put in place, particularly a 20mph speed limit on the A31 as it passes through the settlement. Four Marks/ South Medstead is the only section of this major road that currently has a 30 mph speed restriction. The National Highways Authorities would object to this change.
- Cycle crossing at Station Approach; or widen parallel footpath and upgrade existing pelican crossing to toucan (proposed in 2004 Cycle Plan). The widening of footways to current standards would be difficult without reducing the carriageway width, and expensive if land had to be acquired.
- Consider public realm improvements to regenerate village centre and services. The NPSG would consider that Four Marks Parish Council would gratefully receive funds to improve Oak Green.
- Sinusoidal humps each where required to reduce speeds.
- Footpath widening /surfacing as required to deliver links. Due to the restrictions between buildings and established curtilages, the current historical footpath network within the settlement would be very difficult to widen. Even to walk a cycle along the footpath would create a hazard for a pedestrian coming from the opposite direction,

⁷³ **HCC Strategic transport - plans and policies Local Cycling and Walking Infrastructure Plan**
<https://www.hants.gov.uk/transport/strategies/transportstrategies>

⁷⁴ **EHDC: LCWIP Technical Report v1.2**, Witteveen+Bos UK, August 2020
<https://www.easthants.gov.uk/media/6035/download?inline>

- Stoney Lane and Boyneswood Lane (bridleway): upgrade loose gravel surface to rolled scalpings (proposed in 2004 Cycle Plan). The concept of resurfacing Stoney lane is interesting, as there is no known ownership; and this work would make HCC liable for its maintenance in future tears. It is thought that work on Boyneswood Lane would create a similar issue.
- Route from Four Marks to Ropley (and Alresford) via Brislands Lane incorporating short section of shared use path alongside A31 (proposed in 2004 Cycle Plan) - assumes low volume of pedestrians. We are aware that HCC is considering a cycle route from Winchester to Farnham along the A31.,

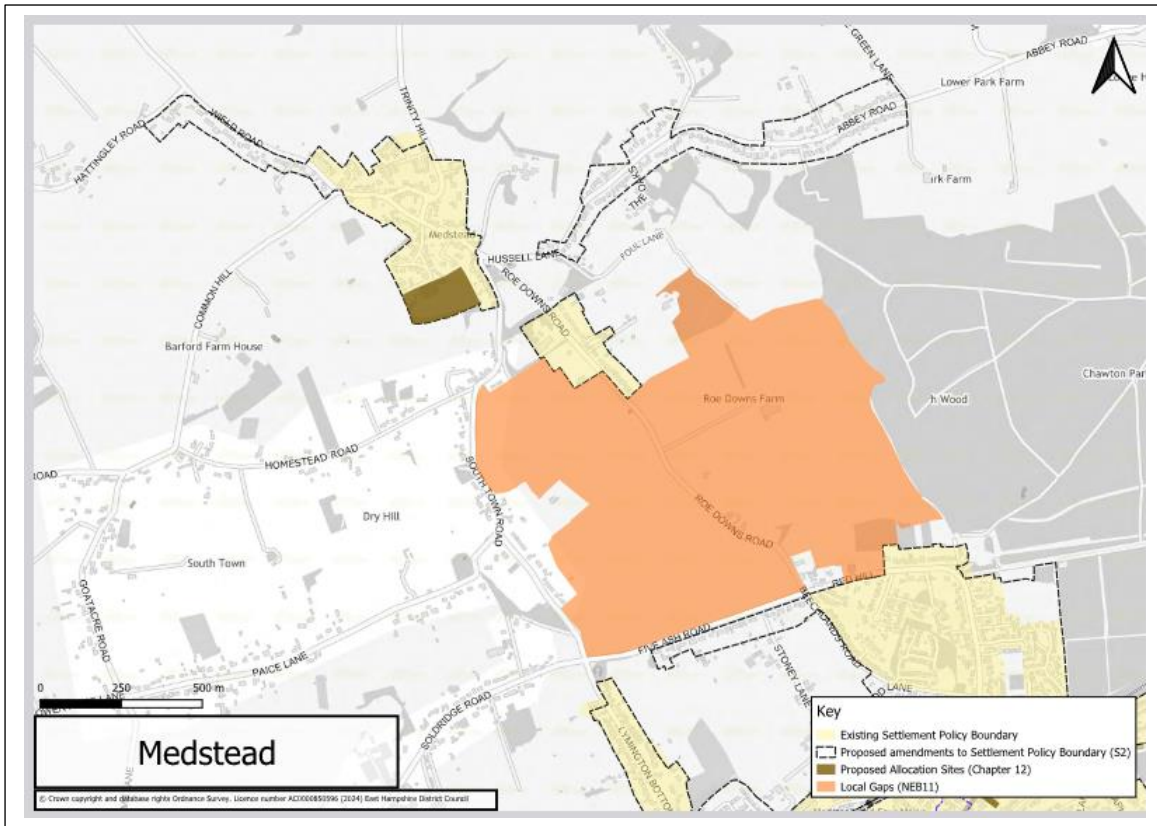
Simmerly, there is a public comment on creating a commuter link on the Mid Hants Heritage railway. From the M&FMNP 'due diligence' in 2015, it is known that HCC would have to subsidise this link by £100 k (2015 cost).

Due to available space the provision of covered cycle parking would be impossible at most of the 14 bus stops in the settlement, although the NPSG considers that it would be acceptable at the School.

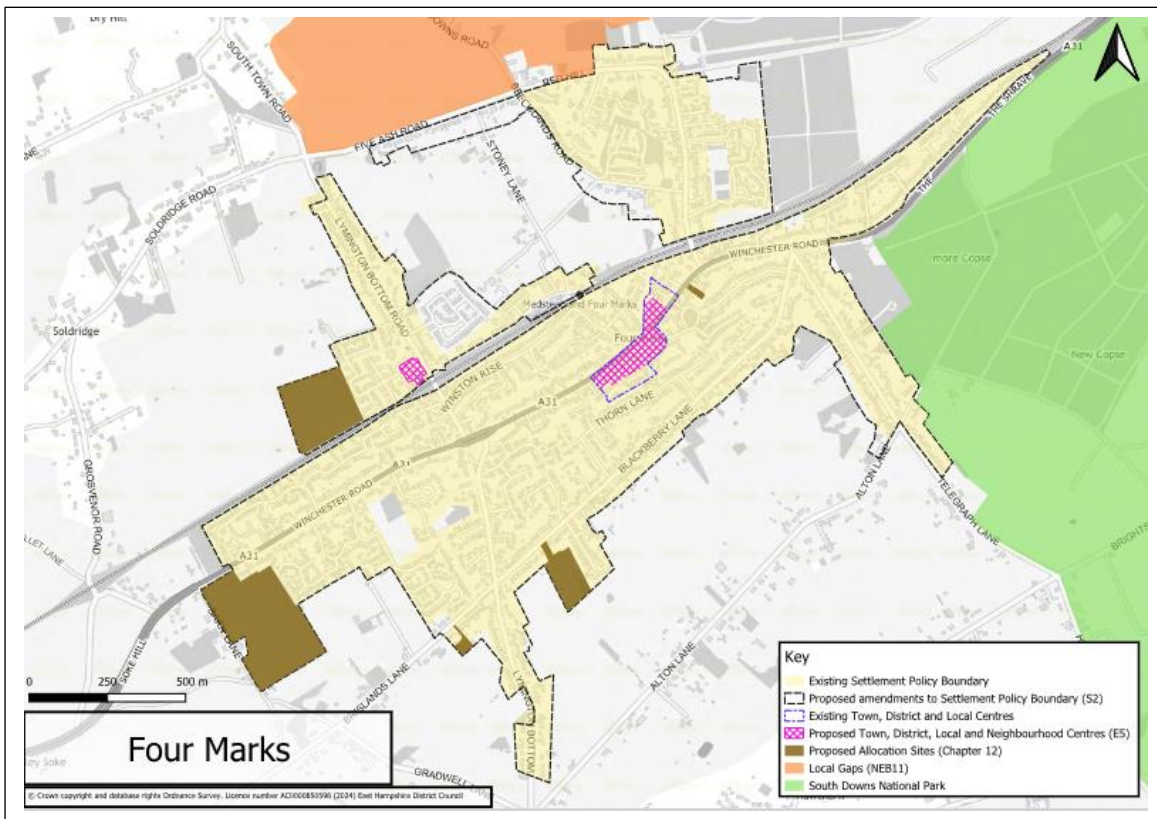
The NPSG note that the new DLP Policies include for cycle storage in new developments.

13.8 Policy Maps

Medstead Policy Map



Four Marks Policy Map





c/o Old Chapel Cottage, Lower Froyle, Alton, Hampshire GU34 4LS

Our ref. FPC/23/010

Date: 26 February 2024

Dear Sir,

Froyle Parish Council response to the 2024 EHDC Local Plan consultation

Thank you for inviting us to provide feedback on the key objectives and policies that should be addressed in the new EHDC Local Plan 2021-2040. Froyle Parish Council appreciates and wholeheartedly supports the ‘vision’ statement and three overarching objectives set out in Part A of the draft Local Plan.

It is recognised that EHDC is committed to meeting the varying needs of our residents with the right housing in terms of size, type and tenure, putting the right homes in the right places, as well as providing homes that are suitable for different groups in the community. Given the high cost of housing in the district, particularly within the villages, there is a long-standing need for good quality affordable houses to allow those who grow up here to have the option to stay. We are all acutely aware that our young people are finding it very difficult to get on the property ladder as first-time buyers or renters and, with a projected 36% increase in those over 65 years old, agree that suitable homes and facilities must be provided that can embrace and be inclusive to both the young and an ageing community.

With these objectives in mind, we recognise that Froyle, as a rural settlement designated within Tier 5 of the reassessed settlement hierarchy, has obvious limitations in terms of infrastructure and sustainable modes of transport, and is therefore unlikely to be able to offer any substantial contribution to meet the strategic criteria set out in Policy H1.

Alton’s ability to accommodate further growth without early commitment to investment in new infrastructure.

Like many rural settlements relying on a neighbouring town to provide community facilities, services, and shops, we are naturally concerned by the continuing focus on Alton. Alton stands alone as the Tier 1 settlement within the Local Plan area, and as such is required to accommodate such a large proportion of the new housing allocations – almost 50% - during the plan period. To all those residents of the town itself and the large number of surrounding settlements that rely on Alton for so many services, there is a clear perception that the growth in population which has already occurred over the last twenty years has left the town on ‘the back foot’, with a fragile infrastructure that is unsustainable if there is further growth in demand.

Whilst acknowledging the clear intentions of Local Plan Policy DGC1 to ensure the timely provision and delivery of key / necessary infrastructure to support new development, consideration must be given to providing Alton with the capability to sufficiently bolster its infrastructure in advance of committing to further housing development, so as to allow it to cope with such further growth over a sustained period.

By contrast, Bordon and Whitehill’s population is set to grow from 14,000 to 22,000 by 2030, enabled by a £1bn, multi-partner, 15-year collaborative and transformational place-making programme that will provide it with a strategically-planned level of infrastructure to support and sustain further expansion. This growth is, by its nature, proactive – something which could now only be emulated in Alton with a ‘reactive’ response at best.

Disproportionate allocation of new homes to Alton compared to other similar sized towns

The allocation of 1700 more homes to Alton over the period of the Local Plan can, in theory, only now take place over the 15 years from 2025 to 2040, equating to an annual figure of 113. By contrast, the existing SDNPA Local Plan and the Petersfield Neighbourhood Plan from 2013 -2028 anticipated accommodating overall growth of 805 homes in Petersfield, equating to an annual figure of only 53.

In terms of other large settlements within the district, it would seem to us that, when compared with Alton, Petersfield and Liphook also have the capacity and potential to grow. Both feature a wide range of services and facilities capable of supporting day to day activities for residents and have excellent road and rail connections.

Calculation of housing allocation

This brings us to the central issue of the method of calculating housing number allocations. Both the original Technical Note: 'Testing the Standard Method Housing Need for East Hampshire', completed in August 2022, and its update in September 2023, assessed the extent to which local demographic evidence provided justification for EHDC to diverge from the Standard Method of calculation and, aligned with this, disaggregate the housing need between the Local Planning Authority (LPA) area and the part of EHDC that falls within the South Downs National Park (SDNP).

Given a current Standard Method figure of 578 dwellings per annum across the District, it has been estimated that a reasonable calculation of need would be for around 114 dwellings per annum in SDNP, with the remaining 464 dwellings per annum in the LPA. An earlier agreement between the LPA and SDNP allowing it to deliver only 100 homes per annum must thus require the LPA to accept the potential unmet need in the SDNP allocation of 14 homes. As a consequence, the LPA figure rises to 478 dwellings per annum, and this now forms the basis of the Plan's housing strategy and its distribution.

Whilst we accept that great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, with a consequential constraint on the scale and extent of development, we do not believe that protection should be at the expense of important agricultural land and environmentally valuable land within the LPA to accommodate the unmet needs within the SDNP.

A case could be made that the rationale behind the consultant's split of the district-wide 578 new homes per annum is based on historic population base data that is, in itself, skewed. When calculating the household growth figure in each sub-area, the consultants have assumed that the future population growth rate in the LPA will be significantly higher than the growth rate in the SDNP. The Technical note makes it clear this is based on the relative population growth rates observed in the period 2011-2020. However for most of that period (certainly since the 100 homes per annum agreement between EHDC and SDNP in 2015) the LPA area has been explicitly building extra houses to meet a significant proportion of the SDNP's housing need, which in turn must have been a significant contributing factor to the higher population growth in the LPA during the period 2011-2020.

If the historic base data reflects the SDNP not meeting its own housing need over at least the last eight years, then the numbers resulting from calculations using that data (i.e. only 114 new homes per annum for the SDNP) cannot reflect the ability of SDNP to meet its own housing need in the future.

Continuing under-provision of new housing for the population in the SDNP will only serve to increase house prices in the SDNP, with inevitable repercussions on the standard method formula for calculating local housing need, and artificially increase housing numbers for those authorities adjacent.

A more reasonable way to split the 578 new homes per annum number would seem to be on a proportionate population basis: this would spread development on an equitable basis for the entire district's population. With 27.5% of the district's population living within the SDNP this would assign 159 to that part of the district, with 419 assigned to the LPA rather than the 464 figure proposed in the draft Plan.

Identification of a strategic site for a major development in the LPA and compliance with Policies in the draft Local Plan

In this and previous consultations, the overall scale of the projected LPA needs has led to the consideration of a large site 'Strategic' allocation of circa 1000 homes, essentially amounting to a new settlement. After much broader consideration, the two potential sites that have been identified in the most recent proposals are both associated with Alton, but both fall outside the settlement policy boundary and are within neighbouring parishes e.g. Neatham Downs is within the Parish of Binsted. As such they are both subject to different planning considerations in the villages and are beyond the jurisdiction of the emerging Alton Neighbourhood Plan, which is itself required to find site allocations for a further 700 homes.

The concept of a new outlying settlement at Neatham Down also seems to contradict the otherwise clear direction of travel set out in the three overarching objectives of the draft Local Plan.

It is claimed that the '*key priority is to protect, enhance and conserve the natural environment to help support habitats and increase local biodiversity but also maintain and improve our high quality built heritage and landscapes*'.

By reference to proposed draft policies :

Policy NBE1 - development will only be permitted where it can be demonstrated that a countryside location is both necessary and justified.

Policy NBE10 : Landscape - new development should be designed and located to protect and enhance valued and high-quality landscapes.

Policy NBE13 : Protection of natural resources - avoid development of the best and most versatile agricultural land unless the benefits of the proposal outweigh the need to protect the land for agricultural purposes.

The Local Plan consultation notes on Landscape state: '*We are lucky to have a distinct and varied landscape which provides an attractive rural setting. It is important that the special qualities of our landscape are respected in planning for future growth.*

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

In its response to the November 2019 Local Plan 'large sites' consultation, the CPRE statement referenced Planning Guidance calling for new developments to be located so as to "protect and enhance valued and high quality landscapes". In these "valued landscapes development should be restricted, as the social and economic benefit of development would be significantly outweighed by the environmental harm".

In their assessment at that time, CPRE Hampshire concluded that the proposed large development sites at Chawton Park Farm Alton, Neatham Down Alton, South of Winchester Road Four Marks, and a large part of Northbrook Park Bentley, fell within tracts of countryside which are "valued" landscapes, and so should not be developed.

In its assessment of the landscape value of Neatham Down in 2021, CPRE Hampshire considered this tract of landscape, which includes the currently proposed site, to be an NPPF Valued Landscape to which NPPF 2019 paragraph 170(a) applies.

Part B of the draft Plan – Creating Desirable Places – includes the following:

‘Retaining a countryside setting to our settlements can also be important in landscape terms: farmland, hedgerows, copses, and woodland all contribute to the character of edge-of-settlement areas, and in combination with local landform and topography, the countryside can provide a sense of containment to our towns and villages, forming part of their identity. If we are efficient in developing land within our planning area for the purposes of meeting our housing needs, less greenfield land is likely to be developed overall.’

By reference to the proposed draft policies below:

Policy H1.2 Housing should be accommodated through development and redevelopment opportunities within existing settlement policy boundaries in the first instance.

Policy H1.3 Housing outside settlement policy boundaries will be permitted where they accord with Policy NBE1 – i.e. where it can be demonstrated that a countryside location is both necessary and justified.

Suitability of a strategic site allocation at Neatham Down:

- 1. Inadequate focus on brownfield site developments:** The Local Plan advocates making as much use as possible of brownfield sites and/or under-utilised land in existing settlements. Development is to be focused in the most sustainable locations that are well served by local facilities and services, housing those important groups of young and older residents close to jobs, shops, leisure and cultural facilities and public transport.
- 2. Proposed location of new settlements is not conducive to reducing car usage and encouraging walking and cycling:** EHDC’s declaration of a climate emergency puts renewed emphasis on reducing travel distances and increasing opportunities for walking and cycling as a means of transport. The phrase ‘living locally’ plays a large part in the settlement hierarchy and climate change background papers. Creating a large new development at Neatham Downs would not appear to satisfy the key objectives, with the distance into Alton town centre falling outside the criteria for a ‘20 minute neighbourhood’ and the route is via an unattractive route through the Mill Lane industrial estate.
- 3. Unacceptable harm to landscape setting:** In landscape terms the town of Alton sits relatively hidden in a hollow, encircled by sloping downland that provides it with a green skyline. Without doubt, the proposal at Neatham Down will have an adverse impact on that setting and the landscape of the Wey Valley. It should be noted that the 98 hectare site identified as ALT8 Land at Neatham Manor Farm takes up a geographical area that is larger than Holybourne.

There are concerns that the A31 – as a physical and psychological barrier – would hinder the integration of a new community with Alton, and that any such large-scale development in open countryside would result in Alton no longer being visually and physically contained by the A31, damaging the placement and historic setting of the town.

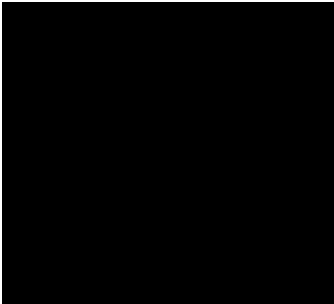
- 4. Distance from Alton town centre:** notwithstanding any limited services that may be built in this new ‘village’, Neatham Down would be less integrated than the proposal at Chawton Park in terms of proximity to the town centre and railway station. The vast majority of services will need to be accessed in Alton and so, like other villages very close to Alton, Irrespective of the number of footpaths, cycleways and bus routes put in place, we consider that Neatham Down would be primarily a car-dependant settlement

In **summary**, Froyle Parish Council would reiterate its support for the ambitions set out in the 'vision' and the key strategic objectives that are needed to deliver it.

However, as a rural settlement, itself heavily reliant on the town of Alton for a majority of our services and facilities, we do have significant concerns about both the proposed overall level of sustained growth and the evidential pressure that this brings when converting greenfield land into a built environment.

On that basis we would strongly urge EHDC to review and reconsider its approach to disaggregate housing need between the LPA area and the part of the district that falls within the SDNP, with a view to a broader (and fairer) distribution across **all** the major settlements within the region, rather than continued reliance on the single Tier 1 designated settlement; and

Yours faithfully



Clerk and Responsible Financial Officer to Froyle Parish Council
Email: clerk@froyleparishcouncil.org.uk [Redacted]

Response from Grayshott Parish Council (submitted via the consultation platform)

Policy S1 Spatial Strategy - What are your comments on this policy? Managing Future Development

The aspiration for housing, employment and retail across East Hampshire seems reasonable.

Policy S2 Settlement Hierarchy - What are your comments on this policy? - Managing Future Development

This policy seems reasonable but lacks consideration for the situation/local constraints of a Tier 3 settlement - it only accounts for size rather than actual space and suitability for new housing potential.

Chapter 3 Managing Future Development - Please provide any further comments on this chapter - Managing Future Development

When managing future developments, the plan does not consider locations (e.g. villages such as Grayshott) which sit close to other district boundaries. In these cases the plan should take account of nearby developments allocated by neighbouring boroughs and districts which will have an impact on these areas.

Chapter 4 Responding to the Climate Emergency - How do you feel about this chapter? - Responding to the Climate Emergency

Satisfied.

Chapter 4 Responding to the Climate Emergency - Please provide any further comments on this chapter - Responding to the Climate Emergency

We support the aspirations of this policy

Chapter 5 Safeguarding our Natural and Built Environment - How do you feel about this chapter? - Safeguarding our Natural and Built Environment

Satisfied

Policy NBE1 Development in the Countryside - What are your comments on this policy? - Safeguarding our Natural and Built Environment

We fully support the gap between settlements and restrictions on building outside of the settlement boundary. Settlements such as Grayshott have a unique character which we support protecting. The character of the village includes its surrounding countryside, heaths, commons and hangers.

We support the fact that the policy does NOT include subdivision of rural plots for additional dwellings. We would like to see this as an explicit restriction in the policy.

Policy NBE11 Gaps Between Settlements - What are your comments on this policy? - Safeguarding our Natural and Built Environment

We support ensuring gaps between settlements to ensure we are preserving the unique character and nature of our rural villages. This is an important policy for our residents.

Chapter 5 Safeguarding our Natural and Built Environment - Please provide any further comments on this chapter -Safeguarding our Natural and Built Environment

We fully support the gap between settlements and restrictions on building outside of the settlement boundary. Settlements such as Grayshott have a unique character which we support protecting. The character of the village includes its surrounding countryside, heaths, commons and hangers.

Chapter 6 Creating Desirable Places - How do you feel about this chapter? - Creating Desirable Places

Neutral

Chapter 1 Introduction and Background - How do you feel about this chapter? - Introduction and Background

Satisfied

Chapter 2 Vision - How do you feel about the Vision? - Vision and Objectives

Satisfied

Chapter 2 Objectives - How do you feel about these objectives? Vision and Objectives

Neutral

Chapter 7 Enabling Communities to Live Well- How do you feel about this chapter? - Enabling Communities to Live Well

Satisfied

Chapter 8 Delivering Green Connections - How do you feel about this chapter? - Delivering Green Connections

Satisfied

Policy DGC1 Infrastructure - What are your comments on this policy? - Delivering Green Connections

We strongly support the continuation of the Community Infrastructure Levy

We would also urge EHDC to consider communities impacted by cross boundary development.

Policy DGC5 Provision and Enhancement of Open Space, Sport and Recreation - What are your comments on this policy? - Delivering Green Connections

As a parish council we support the provision of open space, sport and recreation and we would urge EHDC to support existing and future community sports and recreation projects and spaces.

Chapter 9 Homes for All - How do you feel about this chapter? - Homes for All

Neutral

Chapter 10 Supporting the Local Economy - How do you feel about this chapter? - Supporting the Local Economy

Neutral

Chapter 11 Development Management Policies - How do you feel about this chapter? - Development Management Policies

Satisfied

Policy DM2 Trees, Hedgerows and Woodland - What are your comments on this policy? - Development Management Policies

We fully support the continued use of TPOs to protect trees. We fully support the protection of hedgerows and woodland areas.

Policy DM3 Conservation Areas - What are your comments on this policy? - Development Management Policies

We fully support the continued protection of conservation areas. Grayshott Parish Council and the community take our Conservation Area very seriously and we welcome policies that protect and enhance it.

Policy DM5 Advertisements affecting Heritage Assets - What are your comments on this policy? - Development Management Policies

We fully support the continued protection of conservation areas. Grayshott Parish Council and the community take our Conservation Area very seriously and we welcome policies that protect and enhance it.

Policy DM6 Shopfronts affecting Heritage Assets - What are your comments on this policy? - {65a677326dc4103873b492d4} - Development Management Policies

We fully support the continued protection of conservation areas. Grayshott Parish Council and the community take our Conservation Area very seriously and we welcome policies that protect and enhance it.

Policy DM12 Dark Night Skies - What are your comments on this policy? - Development Management Policies

We fully support the policy that ensures any development considers the impact on dark night skies

Policy DM18 Residential Extensions and Annexes - What are your comments on this policy? - Development Management Policies

We support this policy.

HED1a How do you feel about this site? -HED1 Land at Middle Common

Neutral

HED1b What are your comments on this site? - HED1 Land at Middle Common

We support considerations for a play park and improved footpath access to Headley Down shops.

Headley PC Comments on Draft Local Plan February 2024

Chapter 1 Introduction and Background

Overall, we strongly welcome the draft Local Plan. It includes good recognition of the full range of issues facing the District and its inhabitants and presents a well-thought-out set of policies to address them. Once adopted, it should give developers a clear picture of what kinds of development will and will not be acceptable.

However, the document is very long as it stands, and it must be questionable whether everyone with an interest in the development/protection of the District will be able to fully digest it. One factor in the length of the document is repetition. This occurs both within policy sections and between them.

Within policy sections, repetition is perhaps an inevitable function of the tripartite structure which firstly identifies the problem, then presents the proposed rules and finally sets out how EHDC intends to implement them. In some cases, there is plenty of information to fill out the various sections making them interesting and informative, but in other cases there is less to say, and the text is, accordingly, almost identical in each section, reinforcing the sense of repetition and, potentially, undermining the value of the points being made.

More significant, perhaps, is the repetition between sections. In some cases, such as **DGC3**, **DGC4** and **DGC5**, which cover new and existing community and sports facilities, the policies are very similar and could potentially be combined. In others, such as **NBE2.1c** and **NB3**, exactly the same policy principle (Biodiversity Net Gain) is presented. We do not, of course, disagree with the desired policy outcome but do question the need to require it twice.

A further factor which serves to weaken the impact of the document is the tendency to end policy statements with get out clauses enabling the District Council to ignore its own policies where this is deemed necessary or appropriate. Examples include **NBE2**, which follows a lengthy list of important requirements in **NBE2.1** with a potentially very weak get out clause in **NBE2.2** suggesting these can be overridden if the Council decides it is necessary. Similarly, **NBE4**, **NBE5** and **NBE6** can all be overridden on the production of an "Appropriate Assessment", while **NBE7** simply says that development on flood risk sites should be avoided unless this is "not possible". **NBE14** indicates that development harming heritage assets will not be permitted except where the developer produces a document recognising the significance of the asset they wish to destroy. Members of the public reading these policies might conclude that these get out clauses could be used to bypass the worthwhile rules and principles the Local Plan is seeking to introduce. We do not object to the Council giving itself a degree of flexibility in applying its rules in the real world but believe that these should be worded as strongly as possible (and applied strictly) to discourage and prevent damaging development proposals. Honourable mention, perhaps, might be given in this context to policy **DM2** which declares that the loss or deterioration of ancient woodland or ancient/veteran trees will be refused "except in wholly exceptional circumstances", though even here the "suitable compensation strategy" is open to interpretation.

Chapter 2 Vision and Objectives

Support **Objectives A1, A2, A3**.

Support **Objectives B1, B2, B3, B5** – but cannot see that residents in East Hampshire can "reduce their reliance on the private car" as public transport between villages and towns is sparse or non-existent, as required by **Objective B4**. It is insufficient for EHDC simply to be silent on or refer obliquely to the fact

that public transport is the responsibility of others (e.g. South Western Railway or Hampshire County Council), as in DGC2, while presenting policies that depend crucially on the services that these parties provide for their success. It is also important in this context to note that EHDC doesn't seem to be aware of the parlous state of public transport across its area as its settlement hierarchy calculations are based on long outdated bus service frequencies.

Support **Objectives C1, C2, C3 and C4.**

Chapter 3 Managing Future Development

Policy S1 – Generally support.

Policy S2 – Settlement Hierarchy. We consider that the tiering scores based on the 2018 Settlement Hierarchy Background Paper for Headley, Headley Down and Arford to be out of date, and inaccurate. In particular there are no nurseries or creches, youth clubs or restaurants in any of these locations, and the stations at Liphook or Haslemere are too far away to warrant a score. Neither Headley nor Arford has an hourly bus service and, according to Google Maps, the nearest dentist to Arford is 1.5 miles not 800m.

The mobile Post Office van at Headley Down only operates for three short visits each week totalling three and a half hours per week. We consider the current scores to be:

Headley 14	Suggested Tier 4
Headley Down 11	Suggested Tier 5
Arford 10	Suggested Tier 5

Chapter 4 Responding to the Climate Emergency

TREE PLANTING - There are several mentions of tree-planting in the Local Plan. Whilst we support planting of trees, this must not be a token gesture which could appear to be green-washing. Trees alone cannot support the natural environment which is essential for a sustainable natural ecosystem. More emphasis is required on retained (or rewilded) undisturbed naturally wild spaces (i.e. open scrubland rather than forests) with limited recreational public access and wildlife corridors between them. The planting of trees should not use productive arable and pasture land.

At present there is insufficient infrastructure (pylons and power lines) to support the charging of electric vehicles, and electricity for domestic purposes to replace gas boilers and cooking.

CLIM1. CLIM 1.2 – It is not possible to deliver sustainable transport, i.e. bus services, in most villages and this should be recognised in the Plan.

CLIM2 – Support

CLIM 3 - Strongly support, wasteful demolition should be avoided where possible.

CLIM4 is supported provided that the restrictions listed in **CLIM 4.1** are respected.

Use of Cars – There are many mentions of the need to reduce the reliance on cars, yet the document implies that the alternative is to walk, cycle or take public transport. The reality of this area is that public transport is either limited or non-existent, and many car journeys cannot be replaced by walking or cycling because of distance, purpose of journey and fitness of the individual. We would like to see more encouragement to reduce car journey miles in total by whatever means possible, and this could involve specific provision in future developments to facilitate this. Commuter journeys contribute a large proportion of the driven miles in the area, so more local working, easier car sharing, and local flexible work hubs should be encouraged.

CLIM5 supported.

Chapter 5 Safeguarding our Natural and Built Environment

Objectives B1, B2 and C3 supported.

NBE 1 – Development in the Countryside. Rural Exception sites are supported in principle, but with a minimum percentage of open market housing. New dwellings for rural workers must pass a proven need, and all such dwellings should be registered by EHDC to stop the abuse of ‘Ag-tie’ dwellings not claimed to be used for agricultural, horticultural or forestry purposes in future years. We consider that **NBE1 (h)** should become **Policy NBE 1.2.**

NBE1.5 – Redundant agricultural buildings should only be given permission for residential purposes when the donor building is structurally sound.

NBE2 and NBE3 – No comment.

NBE4 Wealden Heath SPAs - Supported.

NBE5 Thames Basin Heath SPAs – Are any of these SPAs within East Hampshire? If so, on what maps are they shown?

NBE7 Managing Flood Risk, and SUDs - Supported.

NBE8 Water Quality and Supply - Strongly supported.

NBE10 Landscape - Supported.

NBE11 Gaps Between Settlements – We strongly support the Local Gaps between (i) Headley Down and Grayshott (as amended), (ii) Headley Down and Arford, (iii) Arford and Headley, and (iv) Headley and Lindford.

NBE12 Green and Blue Infrastructure – Supported in principle but more detail required.

NBE13 Protection of Natural Resources – Supported in liaison with other authorities.

NBE14 Heritage Assets and the Historic Environment – Supported but requires sufficient resources to “police” this policy. How are Substantial Harm and Less Than Substantial Harm developments determined? Perhaps this should be defined in the Glossary? How are Heritage Assets protected from deliberate demolition.

Chapter 6 Creating Desirable Places

DES1 Well-Designed Places - This is the ultimate “no brainer” policy. Why would anyone – local authority, town or parish council, or existing residents want to disregard this policy? Equally, builders of new homes (and their architect), should design and build new homes that are ‘desirable’ to new purchasers and nearby existing residents. However, design as ‘in the eye of the beholder’ is very difficult to define in planning terms.

DES2 Responding to Local Character - This is a difficult policy to define as our towns and villages have evolved over hundreds of years. The overriding need is for good design, rather than ‘pattern book’ estates. The design features on page 157 are welcomed.

DES3 Residential Density and Local Character - Higher density developments are only suitable in towns and larger villages, but not on the edges of smaller village allocations. We note that Fig 6.8 shows densities in the South of the District. Where are the similar plans for the North West and North East of the District?

DES4 Design Codes - This policy is supported provided that planning applications in the future conform to these guidelines.

Chapter 7 Enabling Communities to Live Well

HWC1 – We support the thrust of this policy – although most of the criteria listed cannot be solely determined by planning policies. **HWC1.1 (b)** – Again most of the communities are without sustainable

and easy access to public transport – so what provision is made for their residents’ Health and Wellbeing.

Chapter 8 Delivering Green Connections

DGC1 Infrastructure - The provision of necessary infrastructure BEFORE development commences is critical to the orderly implementation of the majority of policies in the Local Plan. Hopefully the District Council will ensure that CIL receipts are used to achieve these goals enhanced by specific developers’ contributions towards the provision of school places and highway improvements.

DGC2 Sustainable Transport - As stated previously and re-iterated in Para 8.23 “East Hampshire residents and visitors tend to be reliant on the car as the main mode of transport”. Indeed, the provision of County Council subsidised bus services is already poor and likely to decline further. We remain unconvinced that ‘a strategic planning policy (8.29) is likely to provide bus services for the villages and hamlets in East Hampshire. Outside of the larger towns, walking and cycling are primarily a method of recreation for those able-bodied enough to enjoy it, and indeed pursuing these activities on many of the narrow lanes of the District would be potentially dangerous.

DGC3 New and Improved Community Facilities – Strongly supported.

DGC4 Protection of Community Facilities, including Open Spaces, Sports and Recreation and all other Community Facilities – Strongly supported. However, we consider that community facilities should specifically include shops and public houses.

DGC5 Provision and Enhancement of Open Space, Sport and Recreation - Strongly supported.

Chapter 9 Homes for All

There is a national requirement for more housing caused by factors including the number of single parent families, people living alone, an ageing population, and increased immigration.

H1 Housing Strategy – We therefore support the provision of new homes based on the five tiers listed, which reflect the provision of new dwellings in settlements with the most facilities and transport infrastructure.

H2 Housing Mix and Type – This policy is supported in particular the criteria in H2.2 (a) and (b).

H3 Affordable Housing – This is a most important policy, and we support the provision of 40% affordable housing in developments of 10 or more dwellings. We are concerned that in the past developers have tried to reduce this percentage on the grounds of alleged viability.

H4 Rural Exception Sites – As mentioned in our comments on NBE1 the principle of rural exception sites is supported, but only if all the criteria in **H4.1** are adhered to. We do not consider that market housing of up to 30% constitutes a “small proportion” and feel that this percentage should not exceed 25%.

H5 Specialist Housing – A specific policy that should only be used in accordance with the criteria in **H5.1**.

H6 Park Home Living – We accept that there is a demand for park homes, but to prevent abuse of the planning system the criteria set out in **H6.1 – 6.3** must be strictly adhered to. Other holiday caravan sites in the District, usually in very rural and unsustainable locations, should not be permitted to change to permanent residential status.

H7 Gypsies, Travellers and Travelling Showpeople Accommodation – We support the policy criteria listed in **H7.1 (a) to (b)**. We appreciate that certain pitches and sites have not been the subject of planning applications prior to their construction and therefore have been the subject of retrospective planning applications, often giving rise to friction with local residents. Hopefully this can be avoided by prior applications conforming to the requirements of **H7.1**.

H8 Safeguarding Land for Gypsies, Travellers and travelling Showpeople Accommodation – Supported.

We are concerned that saved **Policy H9** – Area of Special Housing Character (Headley Fields) and **Policy H10** – Special Housing Area (Headley Down) are not carried forward to the Local Plan. We consider that the unmade road at Headley Fields and the large plots therein cannot serve new build properties other than one for one and are not suitable for windfall plots.

Chapter 10 Supporting the Local Economy

We note the charts and information contained within **Figures 10.1 and 10.2**, which highlight the net commuter outflow from East Hampshire which as a mainly rural District does not have large centres of employment compared with, say, Eastleigh.

E1 Planning for Economic Development – Generally supported – and we would stress the importance of **E1.1 (c)** concerning proposals for employment sites in the countryside.

E2 Maintaining and Improving Employment Floorspace – We support the development of the Strategic Employment Sites as listed, in Alton and Whitehill & Bordon. These sites provide local employment opportunities for residents of the District thus avoiding the need to travel long distances (by private car or van).

We note the Local Employment Sites which are shown in detail as Employment Land Review sites as an Appendix to the Local Plan. As many of these sites are in rural locations, we would stress the importance of the growth of such sites being within the site areas shown in blue on each ELR site. It would appear that the boundaries of the Broxhead Trading Estate ELR are greater than the saved **IB6** boundaries. Is this correct?

E3 Rural Economy – This is a very sensitive policy. We would support sympathetic application of this policy provided that the criteria listed are applied to each application.

E4 Retention, Provision and Enhancement of Tourism Uses – Although much of East Hampshire lies within the South Downs National Park, we support the encouragement of tourism within the Local Plan area subject to the criteria set out in **E4.1** and **E4.2**.

E5 Retail Hierarchy and Town Centres – We have previously commented on the Settlement Hierarchy set out in **Policy S2** and remain concerned that in retail terms the village of Headley with a newsagents, café and ladies' hairdresser hardly qualifies as a Neighbourhood Centre.

Chapter 11 Development Management Policies

Policies DM1 – DM13 are supported.

DM14 Public Art – We consider that there should be a new sub-paragraph, i.e. **DM14.1 (e)**, stating that public art should normally be funded by the developers of the selected site.

DM15 Communications Infrastructure – We feel that this policy should have additional criteria requiring the removal of redundant infrastructure such as telecom masts. In this context, we think it is also important for EHDC to include greater (or, indeed, some) reference to mobile telephone communications in this section as good mobile signals are essential in this day and age (not least for accessing emergency services). In many areas, including Headley and Grayshott, signals are patchy at best and often non-existent.

DM16 Self and Custom Housebuilding – The policy is supported – provided that it is for genuine self-build dwellings and not a means of avoiding CIL.

DM17 Backland Development – Another potentially “difficult” policy as the phrase “backland development” often gives rise to concern amongst near neighbours, who are not in possession of the full details of the application. Provided that the planning criteria set out in **DM17.1** are followed in each case, we would support this policy.

We consider that there should be a similar policy setting out the criteria for (i) Infill plots, and (ii) Windfall sites.

DM18 Residential Extensions and Annexes – Supported subject to each application conforming to the criteria in **DM18.1** and **18.2**.

DM19 Conversion of an existing Agricultural or other Rural Building to Residential Use – We are supportive of the first statement in **DM19.1** that conversion “will only be granted in the following circumstances”. However, on several occasions in Headley Parish, the condition in **DM19.1 (e)** “the building is structurally sound and is capable of conversion without major reconstruction” has been proven to be not correct, even though planning permission has been granted. See also our comment re **NBE1.5**.

DM20 Rural Workers Dwellings – This Policy should define the category of rural workers, in particular agriculture, forestry, horticulture and presumably equestrian employees subject to the strict criteria in **DM20.1**. This is another policy that has caused problems in past years, increasingly for potential equestrian enterprises that have been established without obtaining planning permission. The basis of policy **DM20.1** is supported, but in reality, applicants seem to avoid the criteria, and in due course obtain first temporary, and then subsequently permanent planning permission.

In respect of **DM20.2** we have already commented regarding the abuse of “Ag-tie” permissions in our comments on **NBE1**.

DM21 Farming and Forestry Development and Diversification – This policy is supported provided that the criteria set out in **DM21.1** are followed in every case.

DM22 Equestrian and Stabling Development – This policy develops the “horsiculture” policies in previous Local Plans. The policy is broadly supported as Headley and adjoining parishes are well suited to equestrian uses due to the sandy soils, and land of poor arable quality. However, this policy solely relates to the keeping of horses and not to the building of associated residential dwellings.

DM23 Shopping and Town Centre Uses – Generally supported.

Chapter 12 Site Allocations

HED1 – Land at Middle Common

We can agree that this land allocated for 6 travelling showpeoples’ plots is an appropriate location, (albeit in a Local Gap) provided that (i) the southern part of this proposed site is within 400m of the Ludshott Common SPA, and therefore cannot accommodate any of the six proposed pitches. The pitches will therefore have to be located at the northern end of the land allocated under HED1 subject to the preparation of a Habitats Regulation Assessment, (ii) that appropriate screening is planted on the northern boundary adjoining the public footpath, and (iii) no maintenance buildings or amenity blocks are constructed without planning permission.

W&B7 – Land at Hollywater Road and Mill Chase Road (Headley Parish) HEA-018.

In the last 20 years there have been many different proposals for part or all of the tenanted Stanford Grange Farm, which is owned by Hampshire County Council. These have ranged from transformation to a Country Park, a SANG on the entire farm, to the entire area of the Farm shown in the December 2018 Land Availability Assessment as “Residential (C3), Education, SANG” with an indicative housing capacity of 100-360 dwellings in a phased delivery of 11-15 years. The Site Reference was LAA/HEA-018 and the site plan was shown on page 357. No indication of the housing, education uses or SANG was shown on the site plan. The site is shown as SA-8 in the Draft Local Plan, page 48.

In the current Reg 18 Draft Local Plan, W&B7, page 385, the red line site boundary is shown north and west of Cemetery Lane. The three fields to the south of the lane have been given planning permission

as a SANG, under reference 59833 and therefore do not require to be shown as part of the W&B7 allocation.

The Parish Council therefore assumes that the 'Proposed Number of Houses – 126' relates to the two fields north of the lane including the western field described as "Former Mill Chase playing fields" (former rugby pitches) shown in the HCC plan of 10 June 2021. We are in agreement that the eastern field north of the lane (south of Hollywater School, and north of the Whitehill Cemetery) remains in agricultural use. The parish council would request that this important farm with its herd of Charleroi cattle remains in agricultural use without further reductions in its acreage to ensure its continued viability.

However, if any further part of the Stanford Grange Farm, to the north of Cemetery Lane, is proposed for residential purposes, the vehicular access should only be from Mill Chase Road and not from Hollywater Road – either directly or via Cemetery Lane. Mill Chase Road is the rational and safe access to the Bordon highway system, whereas Hollywater Road is unsafe to carry additional traffic, particularly vehicles heading to the hamlet of Stanford. Traffic using Hollywater Road, or particularly exiting via Cemetery Lane, would cause danger to pedestrians crossing Hollywater Road to and from the SANG, as detailed in the paragraph headed "Access" of the Officer's Report of Application 59833.

LOCAL PLAN 2021 - 2040 CONSULTATION

Horndean Parish Council Comments

We welcome the opportunity to make comments on this latest iteration of the Local Plan. Our comments are generic, using the chapter headings of the Local Plan as the structure, but we also make more specific comments at the section on Site Allocations within the Horndean Parish area.

Future Guidance - Core Policies and Supplementary Planning Documents

The Local Plan is “one size fits all” for new developments and extensions/alterations. In due course will there be tailored guidance to assist Parish Councils when considering alterations/extensions and developments below 10 new homes e.g. through CPs and SPDs? We have in mind the Residential Extensions and Householder Developments SPD as well as the Vehicle Parking Standards SPD, as both seem to be out of date and causing some growing divergence from our comments as statutory consultee and those of EHDC at its planning meeting.

Chapter 1 Introduction and Background

1. To what extent has the SDNP Local Plan been relevant in this Local Plan?
2. Is it possible to consider the employment, access to retail and connectivity without mentioning the impact of the proximity to Petersfield (even in a broader context)?
3. How many SDNP residents travel to work or shop in Horndean for example?

Chapter 2 Vision and Objectives

4. Objective A1 and Policy H2 Housing Mix and Type (page 225).
5. With an ageing population it is a pity that stamp duty adds 5%-10% into the equation when someone wishes to downsize.
6. How much thinking will be going into the design of smaller houses in recognition of the 35% increase in the ageing population wishing to downsize? Bungalows are not carbon efficient, but not every ageing person wishes to live in a retirement apartment or move into a home that suits first time buyers.
7. Objective A3 mentions “defined town and village centres” but in fact Horndean and Clanfield, for example, are not that well defined.
8. Objective B3 aims to reduce the reliance on the private car. As the purpose of the consultation is to collect evidence, would it be possible to carry out a high level stocktake to show the location of schools and surgeries in each settlement (and maybe add in the supermarkets) as these drive many of the behaviours that the Plan is hoping to address and might help to give a more realistic view of the viability of walking or cycling to them when smaller developments come forward.
9. There is a lot more awareness around walking and cycling but it is not that pleasant to carry a small bag of shopping over half a mile (and more) especially for mothers with children and the elderly.
10. It is unlikely that people will stop using their cars but perhaps it should be mentioned that more people will be buying electric cars/hybrid cars so the car itself may not be responsible for pollution as much as it is now.
11. Where infrastructure constraints are identified, developers are required to set out what appropriate improvements are necessary. But how do they ensure these will be delivered when the parties involved could be HCC with their own priorities, timescales, and budgets?

Chapter 3 Managing Future Development

12. Can the significance of the unmet needs of 12,000 homes in the sub southern area be expanded on further, as this would appear to have a potentially significant impact on the Southern Parishes.
13. Objective A2 aims to identify and maintain a flexible and varied supply of land and buildings for business. The Local Plan at paragraph 3.15 states that there are limited amounts of vacant employment floorspace and that most businesses are SMEs (98% of businesses in 2021 had less than 50 employees page 250 Our Changing Economy).
14. Anecdotal evidence supports this in that it is exceedingly difficult for a new entrant in the Horndean area to purchase a small industrial unit for light engineering in class B2 under 1200² feet.
15. However, the analysis at page 252 suggests the gross need of 28ha of land over the plan period (to support economic growth and diversification) will be met “through existing commitment and allocations” and that existing premises should renew and refurbish.
16. Hopefully, the light engineering sector will respond to this Local Plan consultation.
17. It is not clear how many extant planning permissions relate to new industrial units. At Parish level we rarely see such applications.
18. The skills and training agreements for developments set out at page 255 in relation to Employment Policies are to be welcomed, but how will they apply when both residential and non-residential developments come forward together?

Chapter 4- Responding to the Climate Emergency

19. Objective B3 mentions the achievement of net zero carbon emissions as a top issue is climate emergency.
20. The goal is to eliminate energy demand or else reduce it as much as possible through the energy efficient heating systems such as air source heat pumps to help achieve the “Be Clean” part of the energy hierarchy.
21. Could there be a clearer position on the policy on heat pumps in new dwellings (especially when there are blocks of apartments and terraces) due to their size, noise levels and maintenance concerns for residents?
22. Generally, could we have more clarity on the policy for energy renewable schemes (Policy Clim4) e.g. battery storage farms and on shore wind farms? The constraints set out at 4.58-4.59 relating to wind energy developments would seem to rule out significant swathes of land in the southern parishes.
23. It is mentioned that the Council may prepare supplementary planning documents to identify ways for meeting renewable energy requirements off-site. Could the plans behind this be elaborated on?

Chapter 5 – Safeguarding Our Natural Environment

24. A key concern for HPC in this chapter is ensuring that development proposals do not lead to coalescence especially between Horndean and Clanfield and Horndean and Lovedean and Catherington (see specific comments on site allocations further below).
25. It is noted that the Blue and Green Infrastructure Strategic Opportunity Areas at Figure 5.4 include in the Key at 7 “Rowlands Castle Allotments”. If these relate to the planned allotments within the LEOH development, they will be offered firstly to Horndean Parish Council under the s106 Agreement and only after that to Rowlands Castle Parish Council

Chapter 6 – Creating Desirable Places

26. The comprehensive policies (DES1-4) set out in this chapter will underpin much of what we as a Parish Council will be using as guidance in our role of statutory consultee.
27. Our comments on the LEOH Design Code have included that high steep roofs are avoided and designing them instead to be more consistent with the traditional architectural vernacular associated with the local buildings in Horndean in the late 1800s and early 1900s.
28. In addition, it is important that materials used must feature a major use of flint to reflect the character of dwellings in Horndean.

Chapter 7- Enabling Communities to Live Well

29. In the diagram at page 174 “access to care and quality of care” forms 20% of the overall determinants of health.
30. The policies at HWC1a) -d) are the holy grail of a local community. Could policy HWC 1 d) include access to clinical care for greater peace of mind?
31. At paragraph 7.4 it is stated that “there are two aspects in supporting the health and wellbeing of our communities.” However, the second one at paragraph 7.5 is expressed vaguely “... and secondly that the facilities needed to support the health and care system are provided.”
32. A recurring theme to be addressed is to plan for doctor’s surgeries and local hospitals to meet the growing demand from an increased population.
33. How are “major developments” defined in paragraph 7.7 in the context of carrying out a Health Impact Assessment (HIA). It is presumed it takes account of the impact on the capacity of a local surgery to handle increased demand.
34. Walking is encouraged across the board, but how safe are the walking routes in rural areas in winter?
35. The Local Plan actively promotes safe routes “free from crime” (Table 7.1) but the truth is that there is evidence of increased crime in the area. We have witnessed broken windows, damaged play areas and drug taking. Should the Local Plan include how safe routes will be “free from crime.”
36. It is acknowledged that the resources of the local policing Neighbourhood Teams are stretched but have the Hampshire Police and Local Fire Services had any input into the Local Plan?

Chapter 8 -Delivering Green Connections

37. Infrastructure (social infrastructure, transportation, and utilities) are vital to the wellbeing and economic success of a community and Appendix H (page 525-533) sets out the approach to the generic infrastructure requirements including flood protection and water management.
38. In this consultation we can only note that:
 - a) the infrastructure requirements are in the hands of the EHDC planning team through a combination of planning conditions, the drafting of s106 agreements and in how the CIL monies are allocated; and
 - b) the delivery of those assets is in the hands of third parties (including neighbouring local planning authorities) with their own timelines, priorities, and budgets.
39. In addition to larger developments, we ask that infrastructure for medium and small sites is also considered so local areas feel that improvements are happening in existing communities too.
40. For example, if two (or more) smaller developments (of less than 10 dwellings) come forward within a mile or two of each other, how joined up is the thinking on how this

impacts the provision of land or school buildings or doctors' surgeries to serve the new developments?

41. What do the plans look like from the collaboration that is mentioned at paragraph 8.6 to "update the evidence of needs and plan for infrastructure provision."
42. It would be helpful to have more information about the extent that the evidence takes account of the planned site allocations (at section 12) in connection with future primary care facilities and schools, for example.
43. At paragraph 8.9 what is the timescale for deciding whether the Local Plan "may allocate specific sites for infrastructure, either on its own or as part of a wider development"?
44. Partnership working with HCC and others also underpins the sustainable transport policy. Collaboration like this is key but who takes responsibility and is accountable for the progress on delivery?
45. There is a potential clash between designing a community building for multi-use (as envisaged at paragraph 8.46- New and Improved Community Facilities) and at the same time siting a sports pitch adjacent to it (Policy DGC5 page 203).
46. Ideally sports pitches should have dedicated changing facilities (the old-style pavilion) relevant to the sport e.g. football, cricket rather than pretend at the same time that they can be satisfactorily accommodated in a building being used for music, films, art etc. Safeguarding concerns can also be an issue.
47. Open spaces and sports and recreational facilities are vital for young people not only for fitness well-being etc, but also for helping to distract from boredom and crime.
48. We may have missed it but are there plans for youth centre facilities?

Site Allocations

49. In this section we have used our local knowledge to make comments on the issues that may need to be addressed in considering future development on the relevant allocated sites within our Parish. We would comment, in due course, on the relevant applicable policies in the normal way in our role as a statutory consultee when or if these come forward to the Parish Council planning committee.
50. As we have mentioned in our comments in the earlier sections of this paper, we believe that care is needed to ensure that smaller developments are not viewed in isolation when considering infrastructure requirements (whether social, utilities or transport). Instead, they should be viewed in the round, with other planned developments in neighbouring areas that, cumulatively, are more likely to have an impact on infrastructure requirements.
51. It is important to note that site allocations are done by whichever settlement is nearest and not on Parish Boundaries. Therefore, for example, one of the Clanfield sites is actually in Horndean Parish. Also, Catherington and Lovedean are mentioned separately. Taking this into account these comments pertain to following developments within Horndean Parish
52. Horndean 320
53. Clanfield Drift Road/White Dirt Lane 80
54. Catherington 13
55. Lovedean 30
56. Total 443 potential new homes in Horndean Parish

57. Major Concerns

58. In addition to the general loss of countryside and biodiversity and the narrowing of gaps between the settlements above our primary concern is infrastructure, not only shops, doctors, schools etc, but also transport, road use, utilities and wildlife corridors.

59. The roads and infrastructure such as sewers in the Horndean area were designed for countryside traffic and habitation levels. We were assured at the Councillor's briefing that infrastructure would be looked at in parallel with the Local Plan over the next 18 months.
60. What if the infrastructure upgrades are not forthcoming? An example was given of the difficulties encountered whereby the EHDC team and the Local Health Authority could not agree to share funding to expand the doctors' surgery at Clanfield. EHDC were willing to use CIL funds, but the Local Health Authority (who needed to fund 1/3 of the bill) had no funds or priority for this – the result no expansion.
61. How will these infrastructure dependencies will be managed? We realise that these projects are often outside EHDC's control but the impact of delayed or missing infrastructure will reflect on whether the Local Plan is considered a success. We are pleased that there will be an Infrastructure Plan but will there be more visibility about how the various interdependencies within it will be joined up?
62. When large developments like Land East of Horndean (LEOH) are considered with over 700 houses in one place, the s106 agreement ensures that specific types of infrastructure will be provided e.g. Sports Pitch, Junior School, Community Building and Skate Park.
63. The developments outlined in the new Local Plan will add 443 houses, in builds between 6-160 houses across 6 or 7 sites, the cumulative effect on infrastructure needs to be sufficiently considered. It is also important to look at the activity in the bordering Parishes/Boroughs – Havant/Rowlands Castle/Clanfield etc because we then soon get to well over 1000 homes into an area of 10sqkm excluding LEOH.

Land at Woodcroft Farm - 160 dwellings

64. This is effectively an extension of Havant Borough's Catherington Park development, which itself is also being extended by the Woodcroft Copse development. The early planning submission we have seen is for 200 dwellings, not 160, with many dwellings in flats or apartments. The site is only accessible via Eagle Avenue/Milton Road.
65. The "local shops" are convenience stores, the nearest supermarkets for the weekly shop being Sainsburys/Lidl/ASDA at Waterlooville or Morrisons on the A3M, increasing traffic on Lovedean Lane and Milton Road.
66. The proposed development on Lovedean Lane is close by and two other developments are underway on Lovedean Lane (Havant Borough side).
67. The Land in the winter is wet, run off is high, and flooding on the smaller roads (e.g. Anmore Road) and in Lovedean Lane residents' gardens on the west side is frequent. There are significant wildlife issues such as a large badger population in the centre of the proposed site. The developer proposes to surround the badgers!
68. There is Woodcroft Junior School on site, but the nearest senior schools are at Cowplain and Horndean Technology College, again a drive not a walk. Buses run to Cowplain but not to Horndean.
69. These drainage and traffic issues need to be understood and mitigation planned. The existing issues with the access roads on to the Catherington Park site need to be resolved (currently the roads are unfinished and not adopted).

Land South of Five Heads Road – 118 Dwellings

70. Once again, we have had early sight of this development. Our major concerns here are traffic on Catherington Lane and the main sewer on Catherington Lane.
71. The developer traffic survey was done at the wrong time of the day, at a time of the year when two school years of HTC children were on exam timetable and work experience. Catherington Lane is busiest between 0800hrs and 1500/1600 hrs and is

considered by the residents as a nightmare. It is busy at other times also, resulting in poor air quality for residents and children attending school particularly between Stonechat Road and London Road.

72. Those same residents experience significant issues with the main sewer, often resulting with sewage backing up into their houses and gardens. Many have had pumps installed because the main sewer is higher than the local pipework. An additional 118 dwellings plus those at Catherington will exacerbate this issue.
73. In addition, this development plus those at Catherington, effectively close the gap between Horndean and Catherington to a few yards on the west side of Catherington Lane. Horndean Junior School and Catherington Infant School are full (but walkable to if they weren't) and would require extension or a rebuild.
74. We understand that Horndean Junior School has been on the rebuild list for some time, but no action has been taken. The nearest weekly shop destination is Morrisons on the A3M (via Catherington Lane!)
75. Lastly the habitats of wildlife such as deer (which graze the land) and the overall biodiversity of the site, need specific actions not in the current developer plans.

Land North of Chalk Hill Road – 38 dwellings

76. Biodiversity and traffic are the major concerns here. This development begins to close the gap with the eco-system of Catherington Lith.
77. There has been much development already at the top of Five Heads Road opposite the park. This will add more traffic making its way down Five Heads Road towards the London Road and the Junior School (where there is a particularly nasty blind corner near the old library). Five Heads Road near the park is not sufficiently wide for two vehicles to pass each other. The schools are full but at least within a walkable distance.

Land at Drift Road – 80 Dwellings

78. This development is in Horndean Parish but is listed as Clanfield. The major concerns here are infrastructure (specifically strains on the Clanfield Surgery), road quality and water run-off. It is known by the EHDC planning team that Clanfield Surgery is at capacity and that attempts to expand it have so far failed. This development and the 100 dwellings at South Lane (within Clanfield Parish) will add to this pressure.
79. The land is currently farmland and is bordered by Drift Road and White Dirt Lane. During heavy rain, the run-off onto White Dirt Lane can cause flash flooding, this would need to be addressed.
80. White Dirt Lane to the south of the site is a narrow road with passing places and high hedgerows and Drift Road is used as a "rat run" between Catherington and Clanfield and is unsuitable for heavy vehicle traffic.

Land at Parsonage Field – 6 Dwellings

81. HPC has received 3 applications for development on this land, all have lacked sufficient detail on the building style/materials and the parking scheme or lack thereof.
82. We objected to the most recent application for this land for the following reasons:
83. This development combined with the Dairy (later) effectively closes the gap completely between the Horndean and Catherington settlements on the west side of Catherington Lane.

84. Being opposite Kingscourt School, and intending remove an existing lay-by, this represents a step backward in highway safety on Catherington Lane.
85. We understand that there are nitrates issues for both this site and the Dairy as the underground water drains ultimately into Langstone harbour.
86. It is true that the land is derelict. Our concern, however, is that landowners now only have to neglect their land so that they can later propose it as a development site (see earlier points on Creating Desirable Places). We would like to see some enforcement action against Landowners to stop this practice. There should be minimum standards of care for land.
87. Lastly, this land is adjacent to the Catherington Conservation (CCA) area where build style and materials need to respect the vernacular of the surroundings buildings.

Land at the Dairy – 7 Dwellings

88. HPC has seen 3 or 4 attempts by the landowners to seek permission for this development. Their latest attempt is for 1 commercial unit (it is/was currently employment land) and 7 self-build dwellings.
89. At last, after many times of trying, HPC has achieved (for the commercial unit) materials in-keeping with the CCA. However, the intent this time is to use this land as self-build land for houses. In our view, land next to a conservation area is a particularly unsuitable location for people to design/build what they like.
90. The motive for the application seems aimed at moving a problem from the landowner to the individual plot owners, resulting in unnecessary and time-consuming work in planning. It is unlikely given the proximity to the CCA that self-builders will want to be constrained in the materials and style of the CCA guidelines resulting in lengthy planning delays.
91. For both of these developments, The Dairy and Parsonage field we also need to address the issues on Catherington Lane (namely traffic and sewers) raised in the previous comments on Land South of Five Heads Road.
92. The net effect of all of these developments on Catherington Lane is that Catherington ceases to be separate from Horndean. This seems to be at odds with the thrust of the emerging local plan to preserve individual settlements.

Land Rear of 191-211 Lovedean Lane – 30 Dwellings

93. Development here has already been approved, in principle, subject to reserved matters. The only comment to add here is that the impact of this development is that the infrastructure requirements should be looked at cumulatively together with Catherington Park, Woodcroft Farm, Woodcroft Copse and the “in-progress” Lovedean Lane in-fill developments. All of these are taking place within a mile stretch of Lovedean Lane/Milton Road. The net effect on population and traffic is huge, the “main” roads are inadequate, and the convenience stores are not suitable for the weekly shop.

Horndean Parish Council

27 February 2024

Response from Kingsley Parish Council (submitted via the consultation platform)

Chapter 1 Introduction and Background - How do you feel about this chapter? - Introduction and Background

Satisfied

Policy S1 Spatial Strategy - What are your comments on this policy? Managing Future Development

Kingsley Parish Council note there are no sites identified for development within the proposed Settlement Policy Boundary for Kingelsy. Figure 12.1 Part D Chapter 12 Site Allocations. This is welcomed by the Parish Council as we are very concerned to have affordable homes for local people to enable them to stay in the area, whether young or old to sustain the village and support the local community.

Policy S2 Settlement Hierarchy - What are your comments on this policy? - Managing Future Development

S2.3 One of the definitions of sustainable development is ensuring good accessibility to local services and facilities. Kingelsy is in Tier 4 and is a settlement which relies on those in Tiers 1, 2 and 3 for local services and facilities, so the consideration of each tier in isolation should be avoided for this reason when assessing the sustainability of developments.

Chapter 4 Responding to the Climate Emergency - How do you feel about this chapter? - Responding to the Climate Emergency

Happy. Kingsley Parish Council support the draft policy set out in this chapter.

Policy NBE1 Development in the Countryside - What are your comments on this policy? - Safeguarding our Natural and Built Environment

The northern boundary of the redevelopment of Whitehill and Bordon (W&B3 BOSC Residential Expansion 38 homes) extends beyond the Settlement Boundary and the W&B Regeneration Area Boundary shown in figure 12.5 of Part D Chapter 12 Site Allocations (page 365). No further encroachment should be allowed beyond these two boundaries to preserve the ecological value and biodiversity of the land between Bordon and Kingsley, and the valuable contribution the woodland makes to the environment and net-zero contributions. Woodland has already been removed to facilitate development around the BOSC, which contravenes EHDC's own policies. There is a report suggesting the biodiversity value here is negligible but this should not be an excuse to build beyond the limits of the original scheme, when there is no need for this, there is sufficient space elsewhere within the W&B regeneration area.

Policy NBE11 Gaps Between Settlements - What are your comments on this policy? - Safeguarding our Natural and Built Environment

Kingsley Parish Council believe more needs to be done to protect and where necessary enforce non development of the gaps between settlements. This allows the local character of the neighbouring parishes to be protected as well as conserving and enhancing the landscape of rural areas. This also provides a natural corridor for the co-existing wildlife to safely navigate the settlements, acknowledging that there is already a major road, the B3004 cutting through the parish.

The northern expansion of the Whitehill and Bordon Regeneration Area (beyond that in the plans) risks encroaching on the gap between Bordon and Kingsley and there should be a clear definition of the settlement boundary and regeneration area which is adhered to. Particularly when there is adequate space and land within the settlement and development boundaries to accommodate the required housing.

The report identifying the poor quality of the diversity and habitat value of this area should not be an automatic right to develop. Indeed improving the diversity and value of the land should be a priority, to retain greenspace, and gaps between settlements. Again EHDC are contradicting their own policies.

Chapter 6 Creating Desirable Places - How do you feel about this chapter? - Creating Desirable Places

Happy. Kingsley Parish Council agree with this draft policy.

Chapter 2 Vision - What are your comments on the Vision? Vision and Objectives

Well explained and cover salient concerns of the area.

Chapter 2 Objectives - What are your comments on the Objectives? - Vision and Objectives

Well defined and explained.

Chapter 7 Enabling Communities to Live Well- How do you feel about this chapter? - Enabling Communities to Live Well

Satisfied

Policy DGC1 Infrastructure - What are your comments on this policy? Delivering Green Connections

Residents of Kingsley rely on neighbouring areas for most of these services and it is important this is considered in relation to nearby developments. The Whitehill and Bordon regeneration area currently has inadequate services for the number of homes built and planned, which in turn impacts Kingsley and surrounding villages. The area urgently needs better infrastructure to properly serve the area it is a local hub for.

Policy DGC2 Sustainable Transport - What are your comments on this policy? - Delivering Green Connections

An essential means of ensuring Kingsley residents use their cars less for short, local journeys is improvement of public footpaths, whether the existing pavements which are so dangerous (not maintained so hedgerows, grass etc have narrowed the pavement) that they are rarely used, or creating walking routes elsewhere to allow people to walk to local amenities such as the Village shop and post office, the Church, playground and pub; and including the Country Market and the bus services on the main Farnham Road.

Policy H2 Housing Mix and Type - What are your comments on this policy? - Homes for All

A diverse blend of sustainable, low carbon housing types is essential, affordable homes with a mix of tenures, family homes and ones for older people, using the lifetime homes concept.

Policy H3 Affordable Housing - What are your comments on this policy? - Homes for All

The Draft Plan states that based on demographic trends, smaller homes are needed, with the largest share of demand from new market homes likely to come from households needing two and three-bedroom homes. In the affordable rented sector, demographic modelling suggests the majority of the requirement is for homes with one or two bedrooms.

Kingsley Parish Council would like to see a higher percentage of affordable housing on the market locally as there is an identified need. We would like to see some clarity on establishing a clear definition of what constitutes 'affordable' in the context of the local community, and the need for a mix of tenure types. This may involve considering the average income, housing prices, and other financial factors specific to the area.

Policy H4 Rural Exception Sites - What are your comments on this policy? - Homes for All

Kingsley Parish Council supports Policy H4, in conjunction with H3, and emphasises the importance of implementing these policies based on an identified local need. Additionally, the council expresses a commitment to tailoring housing or development initiatives to address specific requirements within the Parish.

Policy H7 Gypsies, Travellers and Travelling Showpeople Accommodation - What are your comments on this policy? -Homes for All

While we support this policy, Kingsley Parish Council believe there is a need for additional consideration to outline the specifics of its implementation and enforcement. A comprehensive strategy can be developed to ensure a balanced approach that promotes growth while preserving the local character and integrity of infrastructure. It is essential that existing sites adhere to these policies.

It is noted there are no plots identified for gypsies, travellers and travelling showpeople within the Kingsley Settlement Area nor the areas adjacent, which the Parish Council agrees with. Kingsley and the immediate surrounding area have several plots for Gypsies and Travellers, disproportionate to the size of the Village. In a small community there is a risk of imbalance in favour of the minority

which can create tensions and risk the overlooking the housing needs of others in the Parish. There should be no need during the period of the Plan to approve any further land for use as accommodation for gypsies, travellers and showpeople given the provisions there already are in the area.

Policy E3 Rural economy - What are your comments on this policy? - Supporting the Local Economy

We agree to supporting appropriately sized industrial/business parks within our locality that cater to the area's scale. Recognizing the local demand in our parish, this initiative is aimed at supporting local businesses, fostering job opportunities within the community, and offering guidance and assistance to farmers/landowners considering potential diversification.

Policy DM1 The Local Ecological Network - What are your comments on this policy? - Development Management Policies

We agree with the policy and note that it should be considered in the wider context of the neighbouring landscape, and not just to the identified 500m guidance.

Policy DM4 Listed Buildings - What are your comments on this policy? - Development Management Policies

Kingsley Parish Council agree with this policy but believe greater support is needed to help landowners obtain the necessary support to repair and maintain their buildings, in a timely manner to protect existing structures and avoid their long term deterioration.

Policy DM21 Farm & Forestry Development and Diversification - What are your comments on this policy? -Development Management Policies

Kingsley Parish Council recognises the significance of supporting the development and diversification of farming and forestry businesses. This support is essential to ensure the growth of these sectors while concurrently preserving the openness and distinctive character of the countryside.

Policy DM22 Equestrian and Stabling Development - What are your comments on this policy? - Development Management Policies

Kingsley Parish Council agree with this policy and this policy will be of considerable benefit when assessing applications for such development.

W&B3b What are your comments on this site? - W&B3 BOSC Residential Expansion

Unhappy.

There is no need for development of this site, which is beyond the boundary of the W&B regeneration zone. Just because it has been identified as having poor quality species diversity and habitat value should not automatically make it an area for development. Rather the habitat value

could be improved to offset the trees that have been removed and the virgin ground that has already been built upon in this area. There is plenty of other space within the W&B regeneration area to build without having to expand the boundary.



Medstead Parish Council

Clerk to the Council – [REDACTED]

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Dear Sir

Medstead Parish Council Response to the Draft Local Plan Consultation

Medstead Parish Council fully supports the representation (attached) of the Medstead & Four Marks Neighbourhood Plan Steering Group and would like to emphasise the following points covered in more detail in the NPSG representation.

1. Objection to the proposed Settlement Hierarchy

The Council strongly objects to the allocation of Four Marks/‘south Medstead’ to be considered a Tier 3 Settlement. When the ‘Hexagon Method’ identified by Ridge & Partners in the *Revised Settlement Hierarchy Background Paper*, January 2024 is applied to the process to discern the Tier a settlement, a mathematical lead data analysis is used. Medstead Parish Council believe that this process is acceptable. What is not acceptable is for a subjective arbitrary decision to be made to raise **TWO** Settlements in Tier 4 of the Hierarchy to the next level. If there had been a move to carry this out across all Tiers, from 5 to Tier 2, there could be some understanding of the Process as Grayshott would have been upgraded to Tier 2.

If EHDC have commissioned consultants to carry out an excellent and very detailed independent scientific assessment of the District’s Settlement Hierarchy, it should not arbitrarily try to skew the results to suit its need.

The process used to adjust a settlement in the Hierarchy by ranking the settlement population is not only subjective, but a ‘double count’ of the data. However, when the considering the area of a settlement covered by a ‘Hexagon’, it is noticeable that the housing stock within the hexagon is similar to any other hexagon across the District, outside the SDNP with only a few containing high density high rise blocks of flats.

Thus, the number of **hexagons in a settlement are proportional to the size of the settlement’s population**. Medstead Parish Council believe that the process describe in Section 6 of the *Revised Settlement Hierarchy Background Paper*, to adjust the Tier level due to population to be arbitrary consideration of population size, is in effect double counting, as the population density measurement within a Settlement Policy Boundary has been considered within the philosophy used in creating the original hexagons. Medstead parish council are content with the scientific method by Ridge & Partners to determine the Settlement Tier Level, but insist that the arbitrary ‘adjustment made by EHDC is removed.

The use of population to manipulate the Tier system is unacceptable and undermines the data and findings of Ridge.

2 Allocated Sites

2.1 MSD1 Land rear of Junipers

We welcome the allocation *MSD1 Land rear of Junipers*, which will provide a good fit in its position in the village and help to ensure our future viability of our village. Within the village it is a sustainable location, but it is noticeable that for most employment or retail needs, a private vehicle is needed to access the closest locations.

However, the Council will support this site, as it will sustain the life of the village, but the Council expects the dwellings in the development:

- to be truly affordable
- must include greater than 40% social housing, and
- support the local need for 1, 2 and 3 bedroom dwellings.
- each dwelling should have an insulation level achieving 15kWhr/m²/yr as a minimum, and
- each dwelling to have on site generation (PV) using all available roof space.

2.2 FMS 1 Land West of Lymington Barns

The Council has grave concerns on the inclusion of this site within the Allocations. As EHDC are aware, this has been the subject of many applications, and an Appeal that was withdrawn by the Appellant, followed by yet another application.

This is a cul-de-sac estate extension to the west of another large cul-de-sac estate, set atop of a hill some height above Lymington Bottom Road, accessed via the easterly estates private road system.

The Council is aware of the Applicant suggesting mitigation by redesign in the access road to both estates and create a traffic slowing table halfway up the hill, but has not been asked to comment on the final design.

As the road is not part of the National Highway System, no Road Traffic Accident statistics are produced for the site roads, however the council is aware of a number of road traffic incidents occurring on the current estate roads, vis reports from a councillor resident on the access road and data collected by a local housing interest group, *Stand with Medstead Against Speculative Housing (SMASH)*.

Medstead Parish Council strongly object to the inclusion of this site on moral and H&S grounds. It foresees a fatality on the internal road system knowing of the current catalogue of incidents and near misses.

The Council is not convinced that any Highway mitigation will prevent any RTAs or near misses, on the road between the proposed development, at the top of a reasonably steep gradient, and Lymington Bottom Road will prevent them.

There is greater concern regards to the safety issues associated with climatic effect of ice and snow during winter months, especially as the Climate in Four Marks/ 'South Medstead' is some 2^o C lower than Alton and that the site is located on a ridge, the watershed between the Itchen and Wey, which causes greater exposure to the prevailing southwest wind.

The Council would welcome a discussion with EHDC to consider any reasonable alternative sites, preferably with a better accessibility score than this site(8).

However, should EHDC decline the Parish Council's advice and include the site as an Allocated site, Medstead Parish Council will support it if the dwellings in the development:

- are truly affordable
- include greater than 40% social housing,

- support the local need for 1, 2 and 3 bedroom dwellings.
- have an insulation level that achieves 15kWhr/m2/yr as a minimum,
- on site generation (PV) using all available roof space.

As a contribution to the infrastructure of the area, the Council request:

- the provision of a footway on the north side of Lamborn Way to the adjacent layby on the west side of Limington bottom road to allow for secondary school children access the school bus stop safely.
- the provision of a suitably sized shelter, adjacent to the layby noted above, to accommodate secondary pupils waiting for their bus in inclement weather.
- the provision of a similar suitably sized shelter on Lymington Bottom Road, opposite Five Ash Pond, together with some form of structure to prevent those waiting suffering the effects of the surface water flooding that occurs just to the south of the bus stop.

2.3 Site Allocations

The Council notes that within the Housing Allocations there are two allocated sites within the Parish, and would remind EHDC that although the settlement of Four Marks/ 'South Medstead' was expected to accommodate 175 dwellings between 2013 and 2028, it has already accommodated some 571, some 307 in 'South Medstead' by 31st March 2023. However, there are another 68 dwelling expected with planning permissions granted, and a new planning application pending for effectively 13 more.

Above in our letter you will have noted, although the Council is not willing to accept the allocation to Tier 3, if the placement is to stand then the allocation of 210 dwellings on 3 sites in Four Marks/ 'South Medstead' versus none in Grayshott, twenty in Bentley and nineteen in Holt Pound; seems particularly unbalanced, especially as the Parish is coping with the assimilation of so many new residents. The Council believe that this is unfair and disproportionate.

The Council is willing to support an allocation of new housing in 'South Medstead' but it can only be done in a fair and even handed way.

The Allocated Sites must have the mitigation measures identified for each allocation to make them accessible, sustainable, affordable and meet climate objectives otherwise they will not be supported.

The proposed allocation, *FMS 1 Land West of Lymington Barns*, has a low Ridge & Partners accessibility score of 8 and the Council would welcome discussions on alternative sites if available that have higher scores.

The Council strongly objects to the SPB being amended to include the allocated sites before the Local Plan is adopted and reserves the right to agree changes to the allocated sites should any of the speculative applications and appeals be granted so as to not to over deliver as has been the case in the past.

3. Minor Changes to SPB

The Council has concerns with the proposals outlined in the current iteration of the *Interim Settlement Policy Review Background Paper* and would ask that EHDC meet with Medstead Parish Council before the consultation stage, to discuss our concerns, particularly after some Council member worked hard to make a submission to the 2019 paper, which appears to be mainly ignored in this publication.

Rowlands Castle Parish Council

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East Hampshire District Council Local Plan 2021-2040 Response to Public Consultation

RCPC is grateful for the opportunity to review the draft Local Plan and provide responses to the consultation. In view of the size of the document, councillors have decided to focus on matters of particular interest to RCPC; the responses on the main document below fall into 2 categories, strategic comments on overall policies/objectives and specific comments on individual sections and paragraphs. Comments and proposed additional text then follow on the 4 site allocations within the Parish.

THE FOREWORD

Strategic comment. Encouraging the use of local public transport is welcomed but with the expected loss of funding from HCC with regard to all routes that are not commercially viable (mostly in rural areas) the building of large amounts of housing out in the countryside as opposed to within or adjacent to existing settlements already serviced by public transport doesn't help. The priority for housing should be to re-use brownfield sites or redevelop empty offices and other business premises that do not seem to have a useful future for employment. Also, building needs to go up not just out and we need to develop low-rise (4-8 storeys) blocks of apartments. With an ever-increasing population the housing solution cannot just be to build on yet more green space that is important in its own right for farming and for recreation.

PART A – Planning for the Future of East Hampshire

02 Vision and Objectives

Page 25 – The Vision. Happy with the Vision but 'accessibility' and 'quality affordable homes' will be challenging to achieve and maintaining a supply of suitable land for development cannot be sustained for ever.

03 Managing Future Development

Page 31 - Objective A1. Strategic comment.

What happens when you run out of land? Isn't it time to go up rather than out into the countryside and therefore encourage low-rise (4-8 storey apartment blocks) in town centres close to amenities and public transport hubs. The Council should develop incentivising schemes for developers to utilise brownfield sites and ensure that even on quite small sites there is provision for first time or downsizing buyers.

Page 32 - Paragraph 3.8 states:

'The total unmet needs of neighbouring authorities are currently unknown, however, considering the landscape sensitivity associated with the National Park, there is potential for some unmet housing needs from within the South Downs National Park area'

At a meeting a couple of months ago with the SDNP Local Planning Authority officers, Parish Councillors were given a presentation of how the officers were determining the housing needs for their area via a HEDNA and this appeared to be well-advanced. EHDC should ensure that they consider any quantified estimate of SDNPA unmet needs in this Local Plan as soon as it is available. For example, it could be reflected in the Regulation 19 Publication Consultation or the Reg 22/23 Submission versions of the Local Plan.

Page 33 - Paragraph 3.11 states:

‘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 homes surplus to the identified requirements could be attributed to any future identified unmet need, particularly in the South Hampshire sub-region’.

It should be clarified what is meant by ‘homes surplus to identified requirements’ and stated how it would be calculated. For example, would it be based on the number of windfall developments that had been completed at the time when an unmet need from a neighbouring authority was quantified? Would there be a method of forecasting any ‘homes surplus’ over the plan period?

Page 37 – Housing paragraph 3.12 states:

‘... that the minimum number of homes required in the Local Plan Area between 2021 and 2040 is 9,082 homes, equivalent to 478 homes per annum’.

RCPC observes that this will require a substantial amount of land each year but the supply of land is not limitless, hence the need to build up as well as out.

Page 43 - Policy S2 Settlement Hierarchy.

The hierarchy tiers are supported. (RC is in Tier 3 of 5).

PART B – GREENER PLACES

04 Responding to the Climate Emergency

Page 51 – Objective B4. Strategic comment.

Reducing the use of private vehicles requires good public transport but not just in built up areas or along corridors of habitation. If public transport is only to be provided along commercially viable bus routes then it makes sense to develop the majority of new dwellings adjacent to such routes or close to railway stations (albeit trains only provide transport to more distant destinations because of the gaps between stations).

Page 54 – Policy CLIM 1 Tackling the Climate Emergency. Strategic comment.

You must stop allowing building on flood plains/Flood Zone 3 and even in Flood Zone 2 in some cases unless dwellings are raised clear of the ground to allow water to flow beneath them in times of flooding. Flooding will be a regular occurrence from now on in many areas where it has only been seen occasionally and this must be recognised when allowing developments in or close to flood plains.

Page 62 - Paragraph 4.23. Strategic comment on the issue of renewable energy.

When the sun doesn't shine and the wind doesn't blow (both of which can occur together quite often) the generation of renewable energy drops very considerably. Also, not all locations are suitable for solar panels due to shading or aspect and wind turbines may be sheltered in the lee of buildings or trees. Therefore, while the reduction in demand for energy (heating) could be assisted through good construction it may not be possible to provide cost-effective on-site renewable energy and this must be borne in mind when assessing proposals for developments.

Page 73 - Policy CLIM 4 Renewable and Low-Carbon Energy. Strategic comment.

There is a need to exercise care with regard to the installation of solar panels on farmland to ensure that productive land used for the production of food is not lost in the pursuit of power generation. Too much of the countryside is being lost to large solar farms in the face of potential food shortages due to climate change effects such as flooding of fields and it is essential that a proper balance is maintained. There is a considerable risk of having a monoculture environment with excessive solar panel deserts. Loss of green space that enables mental health & wellbeing for urban populations (you can't walk through a field of solar panels) and loss of pasture for animals or fields for crops and vegetables. Where is the evidence that the energy return is worth the loss of agricultural land that is disposed of for a short-term gain of the sale price rather than holding it for the long-term gain of having sufficient food to feed the population? What is the strategy for solar panels on all existing & new industrial/commercial buildings and sites and where is it?

Page 78 – Paragraph 4.68.

Care needs to be taken with increasing tree cover to ensure that the right trees for the location are planted and that protection against squirrel damage to young saplings in particular is employed. In addition, new young trees need to be watered regularly to ensure that they survive heat waves until their root system is developed so that they can sustain themselves. Too often trees are planted to meet an obligation without ensuring proper aftercare resulting in many saplings dying.

Page 82 - Policy CLIM 5 Climate Resilience - Paragraph 4.65.

It is very important that new building does not take place in Flood Zone 3 unless measures such as raising the building on a platform above ground level are employed. Flooding will present a problem for many properties that would in past years not have been previously impacted by excessive rainfall and that have not been previously affected by flooding. It is necessary to ensure proper surface water drainage is planned for and implemented and that new developments and the surrounding land are able to cope with a large volume of rainfall over short periods, so as to prevent flash flooding. It will be essential to have a high percentage of permeable surface to allow water to soak away but also to have catchments able to absorb water when the ground is saturated.

05 Safeguarding our Natural and Built Environment

Page 89 – Policy NBE1 Development in the Countryside Paragraph 5.10.

There are often attempts to build new dwellings just outside a Settlement Policy Boundary (SPB) in the countryside using the argument that more housing is needed and the countryside adjacent to the SPB should be built on to achieve that. It is essential that there should be no

presumption of building new developments outside the SPB even on what appears to be unused or 'poor quality' land. Nature has a way of using all land that it can access and must not be denied areas of scrub, poor grassland or other similar areas just because it suits a developer to buy it and try to build on it. There must be a high hurdle and proof of dwelling need before any attempt at development should be considered.

Page 90 - NBE 1.1 f.

It would be useful to state that only an extension that is subservient to the existing building will be considered otherwise there will be attempts to get a major extension approved that would dramatically alter the mass of the existing property. Quite a few applications have been seen that where the applicant is trying this on. Sub-paragraphs f and j seem to be stating roughly the same thing so they could be joined together to get the message across re limiting the size of the extension.

Page 93 – Policy NBE2 Biodiversity, Geodiversity and Nature Conservation.

This policy is fully supported in that development proposals must ensure that biodiversity is retained and enhanced on the site submitted for approval.

Page 110 - NBE 7 Managing Flood Risk. Strategic comment.

This is a very important policy and developers must be held rigorously to account on every aspect of flood management as the rainfall will only get more intense as the world warms up. We need to be able to cope with very heavy prolonged periods of rain from time to time and all types of development and drainage must be able to cope with these challenging conditions.

Page 115 – Policy NBE 8 sub-para 4 - Water Efficiency Standard of not more than 95 l/p/d.

RCPC strongly supports this approach, it is possible to reduce individual use considerably when people think about their use of water and make conscious efforts to reduce it. Water is a precious and fairly expensive resource and using less of it not only conserves supply but also reduces waste water in sewers, thus reducing pressure on sewage works.

Page 121 - NBE 10 Landscape.

One key means of protecting landscape is to ensure that developers give priority to brownfield site development and that in town centres in particular, low-rise apartment blocks of up to 8 storeys high are constructed, thus reducing countryside loss and maximizing use of brownfield land close to transport hubs and various amenities. Village & rural locations should be protected from urban overspill, able to retain their character, yet be accessible so that they become 'mental health & wellbeing hubs' for urban and town populations.

Page 124 - NBE 11 Gaps between settlements.

These are essential to allow people to consider themselves living in a distinct area/settlement that they can have an affinity with and thus develop a sense of 'belonging' as opposed to living in a vast conurbation. Such gaps must be maintained by utilizing land to best effect within SPBs and recognising that productive farmland is essential to maintain the UK's independent food production requirement to be self-sufficient and that countryside for recreation is essential to the maintenance of people's physical and mental health.

Page 124 - NBE11.2.

It is suggested that the wording be changed to read 'Planning permission will be considered..... rather than 'granted'. The latter word implies there will be no problem in granting permission but subsequent paragraphs 5.81 and 5.82 actually imply that various factors will be considered in arriving at a decision.

Page 126 – NBE 12 Green and Blue Infrastructure. Figure 5.4.

This shows that Rowlands Castle has the opportunity for allotments. Allotments are already provided by Portsmouth City Council for their residents on Durrants Road that are also used by some residents of Rowlands Castle and it is not clear where additional allotments would be sited, albeit that some more plots would probably be welcomed.

06 Creating Desirable Places

Page 147 – Policy DES 1 Well-designed Places.

DES1.1 states "New development will be permitted where it would help to achieve the following design vision:"

There is a need to insert a new sub para that states that, where possible, new developments should be positioned close to public transport (bus routes and/or stations) to facilitate the reduction in use of private vehicles. (Reason - Cycling and walking connections are all very well but public transport is an essential component of people movement for medium and longer distance travel)

Page 155 - Policy DES2 – Responding to Local Character.

Paragraph 'b.' should also refer to Settlement Character Assessments, Local Landscape Character Assessments and Village Design Statements.

Page 162 - Policy DES3 Residential Density and Local Character.

High residential density should be supported within towns where brownfield sites are available for re-development.

PART C - VIBRANT COMMUNITIES

08 Delivering Green Connections

Page 184 - DGC1 Infrastructure.

Contributions by developers to local infrastructure elements are crucial to alleviate the impact of new homes and business on existing infrastructure that may be insufficient or unable to support increased use without improvements. The policy details on page 185 are supported so that the right infrastructure is put in place before residents or users take possession of dwellings or places of work.

Page 188 - DGC2 Sustainable transport - paragraphs 8.23 and 8.24.

There is a definite need to focus future developments on Tier 1 and tier 2 locations and as close as possible to the centres to ensure that walking and cycling can be used for short journeys. It will also place people close to bus routes and, in some cases, railway stations, to facilitate longer journeys. It must be recognised that putting new developments out in the countryside away

from public transport routes and hubs will inevitably cause most people to use cars as there is no alternative hence the increase of CO2 emissions. Brownfield developments with safe, easy to use transport routes (such as cycle paths) to town centres, together with improving access out to villages and rural spaces will protect unique locations, reduce dependency on cars and facilitate health & wellbeing for town & rural residents. It must be remembered that for shopping or other journeys where loads need to be carried the private vehicle will still be the most favoured means of moving from A to B but getting people to walk or cycle for short distances can make a difference.

Page 196 - Policy DGC3 New and improved community facilities.

If developers offer new facilities there should be some for both town and rural residents, with funding to support their initial operation, but also a recognition by the LPA that P&TCs may not have the financial resources to take over such facilities and that simpler solutions may be appropriate to support social and sports activities. Developers must be strongly encouraged to engage early with residents' representatives to understand community needs and provide reasonable solutions.

09 Homes for All

Strategic comment. It must be recognised that, in some areas, there really is not a large supply of land to build on and that in towns or urban areas there is a need to go up rather than out. Apartments blocks of between 4-8 storeys make a much better use of land than just building housing, even terrace housing with small gardens soon takes up considerable amounts of land. Also, elderly people living in large houses who need to down-size are finding it hard to get smaller properties because too great a proportion of new homes are larger 3 and 4-bedroom properties because they provide a greater return for developers. Bungalows and ground floor apartments need to be provided for both older people and those with specific mobility problems such as requiring wheelchairs. Overall, planners need to require a good proportion of new properties to be suitable for older people looking to downsize and for singletons and couples looking to buy or rent their first property and developers of even small sites need to recognise and act on the need to accommodate such needs.

Page 220 - Policy H1 Housing Strategy.

it is right that most of the housing be allocated to the Tier 1 and Tier 2 areas in the Settlement Hierarchy to ensure new dwellings are close to centres with a range of shops and amenities and that are also public transport hubs. The use of brownfield sites and those sites that are under-utilised within built up areas must be a priority. Within that overall strategy planners should encourage low-rise apartment blocks to maximise use of land rather than seeing an ever-widening loss of necessary countryside.

Page 221 – Implementing the Policy – paragraph 9.28 states:

‘Other mechanisms to meet the Local Plan Area’s housing needs are to resist proposals that result in the net loss of dwellings and to allow suitable homes in the countryside that are in line with Policy NBE1. Neighbourhood plans are also a useful tool to allocate further housing that achieves the vision and aspirations of specific communities.’

With regard to the last sentence above, this should require EHDC to inform those developing NPs of the number of houses required for the NP Designated Area and an additional sentence to that effect should be added afterwards.

Page 223 - Policy H2 Housing Mix and Type Paragraph 9.34.

It is agreed that the largest share of demand for new market homes is likely to come from households needing only two and three-bedroomed homes. In the affordable rental sector it is also agreed that the majority of the requirement is for one and two-bedroomed homes. It is essential that developers are only permitted to bring forward schemes that offer these sorts of properties in sufficient numbers, even for quite small developments. Developers seem interested only in building big expensive properties that do not meet the needs of many but which net them large profits. Developers need some financial incentivisation to build smaller dwellings, perhaps by reducing S106 and CIL payments required.

Page 225 – Implementing the Policy paragraph 9.41 states:

‘The Local Planning Authority recognises that future development will need to respond appropriately to local needs. Therefore, regard should be had to bespoke local housing need evidence relating to individual parishes, through the preparation of neighbourhood plans.’

This approach is encouraged because it is important that, when assessing planning applications, EHDC does consider any Housing Needs Survey results that are derived in the preparation of any Neighbourhood Plan

Page 228 Policy H3 Affordable Housing H3.1.

To meet the requirements covered in the previous paragraph it is proposed that the reference to “10 dwellings or more” be reduced to “5 dwellings or more” to enable more of the smaller properties to be built. If this is really regarded as unfeasible then at least reduce the starting point to 7 or 8 dwellings, otherwise these smaller properties will never be built in sufficient numbers.

Page 232 Policy H4 Rural Exception Sites H4.1a.

The identified local need should not just be agreed by the LPA but also be agreed by Parish Councils who know the area in detail to avoid developers putting forward such plans just to build yet more houses in what may be unsuitable locations for prospective residents. It is particularly important to avoid these sites being developed outside of an SPB in areas far from amenities leading to a feeling of isolation from hubs that offer services such as shops, employment and public transport.

10 Supporting the Local Economy

Page 249 Objective A2.

It is important to maintain a flexible supply of land and buildings for business within our more rural communities and every effort must be made to prevent conversion to dwellings or other uses without rigorous assessment of the ability of new businesses to take vacant properties. Too often these buildings are not marketed properly to really determine whether there are business owners wishing to take on such properties when previous users have finished with them.

PART D: DEVELOPMENT MANAGEMENT POLICIES AND SITE ALLOCATIONS

11 Development Management Policies

Page 276 - Policy DM2 Trees, Hedgerows and Woodland.

This policy is supported fully in that these features form an absolutely essential part of our environment and are key to the maintenance of a balanced nature world in which we live and that is essential to our wellbeing. Along with these features there is also the need to retain open land with mixed low vegetation such as fields, common land and small parcels of rough ground where birds and animals can obtain food. Unnecessary loss of open ground is also a concern.

Page 277 - Policy DM2

Paragraph 11.11 should have the following sentence added: In addition, Tree Protection Plans must be submitted and compliance with these will be enforced.

Page 307 - Policy DM16 - Self and Custom Housebuilding.

There is no mention of how proposals for such building outside of settlement policy boundaries will be treated. It is very important to stop development in the country through stealth, whereby individuals seek to do self or custom housebuilding on individual plots that over time morph together into larger communities and thus take-over what was countryside and become a built environment. In particular, EHDC needs to state a clear policy on this issue in that proposals for self-build that imply multiple dwellings on large sites in close proximity outside SPBs will not be permitted. An example might be where a large field has been sold off by a landowner for such purposes outside the SPB and away from amenities, thus requiring the use of private vehicles at all times to travel from and to the site thus turning what was countryside into a semi-urban site.

Page 309 Para 11.113 - Policy DM17 Backland Development.

This paragraph implies that backland development is more likely than not to be approved given the sentence:

“Therefore, it is important that applications for the redevelopment of residential garden land are considered in the context of the presumption in favour of sustainable development and planning permission will be granted unless the adverse impacts on character, amenity and privacy outweigh the benefits of the development”.

If that is the case then it must be made clear that the form of the development must be tailored to the immediate locality in which it is situated and that buildings may need to be single storey or with less ‘presence’ in order to gain approval, particularly when the site is viewed from open areas/countryside. Backland development must merge with the surrounding area and not stand out as dominant in any views.

Strategic comment. It must also be remembered that residential gardens form a key part of the environment, providing habitat to a wide range of insects, birds and small mammals together with open space for humans to relax within. The loss of larger gardens to more development will have a significant adverse impact on many species that are already suffering from loss of habitat across built up areas and from the negative effects of climate change. That is why there should not be a presumption that backland development will be approved.

Page 310 – Policy DM18 Residential Extensions and Annexes

Paragraph DM18.2. b. states “It is proportionate in size to the principal dwelling”;

The adjective ‘proportionate’ can be very subjective so, as with SDNP Policy SD31: Extensions to Existing Dwellings and Provision of Annexes and Outbuildings paragraph 1a), a metric should be specified by EHDC to avoid any room for argument or doubt.

12: Site Allocations (Rowlands Castle)

Page 439 – Figure 12.24: Housing in Rowlands Castle.

The number of homes shown as awaiting outstanding permission (2023) is incorrect. No account appears to have been taken of Planning Application 53322/007 - Development of 61 dwellings - Land North of Bartons Road within Rowlands Castle Parish, which was recommended for approval during 2023 but still awaits a final decision and therefore is part of ‘outstanding permissions’. This site was not allocated in the EHDC Local Plan Housing and Employment Allocations (2016), or in this emerging Local Plan, and needs to be accounted for as an extra in new housing totals within the Parish

If application 53322/007 had not been considered as an ‘outstanding permission’ when the draft Local Plan was being prepared (which it should have been) it must be demonstrated that the significant number of 61 dwellings had been considered when determining the number of ‘Proposed New allocations’ required. This number of houses will make a very considerable increase in the total to be built in Rowlands Castle Parish from outstanding permissions and would more than compensate for the requested removal of Sites RLC1 and RLC2 as discussed below. The proposed new allocations (to 2040) should now be reviewed and the proposed small numbers of housing for RLC1 and RLC2 deleted from that total.

In addition, for completeness, the table should show the number of windfalls projected over the plan period, based on the windfall allowance analysis, referred to in Part A Chapter 2 paragraph 3.25 on page 40 of the draft Local Plan

Page 439 – Figure 12.25: Location of outstanding housing permissions and proposed sites in Rowlands Castle.

The footnote states that the ‘Proposed development at Little Leigh Farm site falls within Rowlands Castle Parish but relates to the built-up area of Havant Borough Council’. This could wrongly imply that the number of dwellings on this site would not be included in the ‘Proposed new allocations (to 2040)’ of 145 new homes within Rowlands Castle. This is a development within the Parish boundary and must be considered within the overall numbers of housing built within the Parish, hence our request that the numbers in Figure 12.24 be adjusted accordingly.

For clarity, the footnote could indicate that the ‘Little Leigh Farm site’ can be seen on the Policies Maps.

LAA Reference RC-006 – RLC1 - Land at Deerleap Lane (North) and LAA Reference RC-007 – RLC2 - Land at Deerleap Lane (South) – Overarching comments

The Green is the heart of Rowlands Castle Village and the Conservation Area and any changes go to the heart of both. The long flint wall on the south side is a unique feature and the woods

behind underpin the sense of this being the rural fringe to the south of the village centre. Development of these sites would run contrary to Rowlands Castle Parish Neighbourhood Plan Policy 2 (Landscape Character and Views), specifically Policy Objectives 1 and 2 wrt conserving and enhancing the parish landscape and maintaining the distinctive landscape vistas. The Policy states that “Development proposals that would have an unacceptable impact on a locally significant view will not be supported”. In particular, Important View C6 (Rowlands Castle Village Green, view south towards Deerleap) applies here; there will be a very adverse visual impact on the Conservation Area as seen from the Green and from dwellings surrounding the Green, which look out on a variety of trees within the Deerleap area behind the flint wall on the north side of RLC1., This will greatly alter for the worse the whole feeling of this semi-rural village centre. The Neighbourhood Plan has been approved by EHDC but these site allocations contravene Policy 2.

Also, RCPC is very concerned that a valuable green space would be lost that not only adds very considerably to the character of Rowlands Castle centre within the Conservation Area but within which a variety of amphibians live and move annually to the nearby lake, close by within the Deerleap development, to breed. Dormice, another protected species, have also been found on both sites. The overall habitat and environment within the SPB benefit from a number of green spaces; these 2 areas, being secluded and not normally experiencing human presence, provides great habitat for a wide range of insects, animals and birds.

Additionally, the area currently absorbs heavy rainfall when it occurs; the building of dwellings with attendant roads and driveways that are not permeable could lead to considerable runoff that will affect existing properties to the north and below the 2 sites, together with Redhill Road along the Green where flooding does already occur during prolonged heavy rain.

Overall, RCPC is strongly opposed to the development of these 2 sites (along with many residents) and requests that they be deleted from sites for consideration. Further detailed comments on the information provided w.r.t. the specific sites in the draft LP follow:

RLC1 – Land at Deerleap (north)

Page 441 - List of Constraints & Opportunities. Additional comments on some aspects:

1. **Biodiversity:** The site is designated as ‘Wood pasture and Parkland BAP (Biodiversity Action Plan) Priority Habitat (England). Wood pasture and parkland are mosaic habitats valued for their trees, especially veteran and ancient trees, and the plants and animals that they support, so the site has a significant biodiversity value. Policies NBE2: ‘Biodiversity, Geodiversity, and Nature Conservation’ and DM2: ‘Trees, Hedges and Woodland’ will apply.

The ‘Sustainability Appraisal (SA) of the East Hampshire Site Allocations Plan – April 2015’ stated for site ‘RC002 – Land at Deerleap’:

‘There is the potential for the site to have value for biodiversity, given that it has a meadow grassland character, and is surrounded by a wooded landscape to the south’. The SA showed that the then-proposed site had an area of 0.8, while the combined area of sites RLC1 and RLC2 is 1.6 ha so together they would have a greater value for biodiversity. This site was not allocated in the East Hampshire District Local Plan - Housing and Employment Allocations Plan’ – April 2016.

The site is also designated as: National Habitat Network All Habitats Combined (England) - Network Enhancement Zone 1'.

Great Crested Newts, smooth newts, frogs and toads migrate from a pond to the south of Deerleap Lane across the proposed Deerleap sites to a pond adjacent to the sites. See below for 'Photograph of smooth newt, great crested newt and toad'. This photograph of the amphibians undertaking this journey was taken in February 2024. Dormice, which are another protected species have also been found on the site.

Photograph of smooth newt, great crested newt and toad'



2. Water Quality: Because the site is within a groundwater source protection zone (SPZ1), any development must comply with Policy NBE13: 'Protection of Natural Resources'.
3. Built Heritage: The northern boundary wall is the 'Flint wall, Deerleap', which is classified as a 'non-designated heritage asset' in the Rowlands Castle Neighbourhood Plan Policy 4 – Historical Environment: Non-designated Heritage Assets (number 7 in Table 3 on page 32, and on page 36). Policy DM10: 'Locally important and non-designated heritage assets,' will apply. [Views of the flint wall are also included in the 'Rowlands Castle Settlement Character Assessment (2020)' on pages 5, 6 and 27.]
4. Landscape: The area of the Conservation Area within the Rowlands Castle Parish is about 6 hectares so the sites RLC 1 and RLC 2 (total area 1.6 hectares) together would occupy 27% of the Conservation Area and thereby would have a very significant adverse impact on the Area, by removing the open character of this part of the Area.

The Rowlands Castle Conservation Area Guidance leaflet published by EHDC includes:

- ‘The character of the Rowlands Castle Conservation Area is created by the strong combination of the 19th century homes which front onto the large open Green and the high flint walls of Deerleap. When taken together these features create an attractive scene and even minor alterations could spoil it.’
- The design of new buildings, extensions and alterations to existing buildings will all affect its character.’
- ‘The grounds of Deerleap are a basic landscape component to the village and form a rural edge to its southern side as well as a separation from neighbouring settlements and a contrast to the built form encircling The Green.’

The Rowlands Castle Conservation Area Guidance leaflet is part of the Evidence Base for Rowlands Castle Neighbourhood Plan Policy 4 – Historic Environment – Non-designated Heritage Assets.

- The development would remove the rural edge of the Conservation Area that separates it from the recent developments on Bailey Road and Deerleap Lane (on the site of the former Keyline builders’ merchants).
- It would not be possible to mitigate the impact of any development on the site in order to comply with Rowlands Castle Neighbourhood Plan Policy 2 - Landscape Character and Views. The significant view C6 in Table 1 on page 20 of the Neighbourhood Plan is of the northern boundary of the site as viewed from Rowlands Castle Village Green (a ‘Local Green Space’). This is because the site slopes upwards from the approximately 3-metre-high flint wall so the upper parts of walls and roofs of any dwellings would be much higher than the flint wall and, therefore, very visible from the village green especially when the trees shed their leaves. The further back from the flint wall any development might be, the higher the ground would be and the greater the impact on the local green space and conservation area would be.
- See at end of this document (Annex B) the ‘Examiner’s report for Deerleap for EHDC Local Plan Second Review – 2006’. Page 2 of that report paragraph 5.4.40 last sentence states: “Development of this land as proposed would fly in the face of the relevant legislation that is designed to protect these Areas. It should not be countenanced”.
- Development of this site would not comply with policy DM3 (Conservation Areas) paragraph DM 3.1 or paragraphs DM 3.2 c) and DM 3.2 d).

Page 441 - Summary of Reasons for Inclusion. Additional comments:

1. The site is in the Rowlands Castle Conservation Area, so mature trees *must* (and not ‘*could*’) be retained. See policy DM3 ‘Conservation Areas’.
2. To avoid impacts on the local green space and conservation area, in addition to retaining the northern boundary wall, the trees along the boundary which are in the Rowlands Castle Conservation Area and are therefore protected, would have to be retained. The northern boundary wall is the ‘Flint wall, Deerleap’ which is classified as a ‘non-designated heritage asset’ in the Rowlands Castle Neighbourhood Plan Policy 4 ‘Historic Environment: Non-Designated Heritage Assets’ - number 7 in Table 3 on page 32, and on page 36, and must, therefore, be retained.

3. The Rowlands Castle Village Green (a 'Local Green Space') was registered as a 'Village Green' in 1966 so under acts of parliament it is protected from any development. The registration documents are held by the Hampshire County Council 'Commons Registration Authority'. Plans Policy NBE12: 'Blue and Green Infrastructure' will apply.

Page 441 - Infrastructure Requirements. Additional comments:

Access. The Developer Contributions should be towards accessibility to the Down platform and also improved parking provision at Rowlands Castle train station as stated in in section 15 'Infrastructure Schedule' (page 81) of the 'Draft Local Plan 2021-2040 (Regulation 18) Emerging Infrastructure Plan' January 2024. There should also be a contribution for improvements to the mini-roundabouts at the junction of Whichers Gate Road, Redhill Road and Manor Lodge Road.

RLC2 – Land at Deerleap (south)

Page 444 - List of Constraints & Opportunities. Additional comments on some aspects:

1. Biodiversity: The site is designated as 'Woodpasture and Parkland BAP (Biodiversity Action Plan) Priority Habitat (England)' so like site RLC1 it has a significant biodiversity value. Policy NBE2: 'Biodiversity, Geodiversity, and Nature Conservation' and DM2: 'Trees, Hedges and Woodland' will apply.

The 'Sustainability Appraisal (SA) of the East Hampshire Site Allocations Plan' – April 2015 stated for site 'RC002 – Land at Deerleap':

'There is the potential for the site to have value for biodiversity, given that it has a meadow grassland character, and is surrounded by a wooded landscape to the south'.

The SA shows that the then-proposed site had an area of 0.8, while the combined area of sites RLC1 and RLC2 is 1.6 ha so they could have a greater value for biodiversity. This site was not allocated in the East Hampshire District Local Plan - Housing and Employment Allocations Plan' – April 2016.

The site is also designated as 'National Habitat Network All Habitats Combined (England) – Network Enhancement Zone 1'.

As for RLC1 above, Great Crested Newts, smooth newts, frogs and toads migrate from a pond to the south of Deerleap Lane across the proposed Deerleap sites to a pond adjacent to the sites. See photo within RLC1 additional comments above. Dormice, another protected species, have also been discovered no this site

2. Water Quality: Because the site is within a groundwater source protection zone (SPZ1), any development must comply with Policy NBE13: 'Protection of Natural Resources'.
3. Access: On the Site Map on page 443, the site boundary is denoted by a red line, and there is a wooded area between the site boundary and Deerleap Lane. It is not indicated if that wooded area is in the same ownership as the site, and so it is not demonstrated that there could be access to the site.

There is also an issue with achieving the required visibility splay from the existing access to the site because the trees along the boundary are in a conservation area and are, therefore, protected and could not be removed. The visibility splay would have to be sufficient because of the proximity of the access to the sharp bend on Deerleap Lane.

The area of Deerleap Lane where the proposed site access would be is an unadopted road for which a management company is responsible. It is not stated that the management company would permit residents of the proposed site to use Deerleap Lane.

4. Landscape: The area of the Conservation Area within the Rowlands Castle Parish is about 6 hectares so the sites RLC 1 and RLC 2 (total area 1.6 hectares) together would occupy 27% of the Conservation Area and thereby would have a very significant adverse impact on the Area, by removing the open character of this part of the Area.

The Rowlands Castle Conservation Area Guidance leaflet published by EHDC includes:

- 'The character of the Rowlands Castle Conservation Area is created by the strong combination of the 19th century homes which front onto the large open Green and the high flint walls of Deerleap. When taken together these features create an attractive scene and even minor alterations could spoil it.'
- 'The design of new buildings, extensions and alterations to existing buildings will all affect its character.'
- 'The grounds of Deerleap are a basic landscape component to the village and form a rural edge to its southern side as well as a separation from neighbouring settlements and a contrast to the built form encircling The Green.'

The Rowlands Castle Conservation Area Guidance leaflet is part of the Evidence Base for Rowlands Castle Neighbourhood Plan Policy 4 – Historic Environment – Non-designated Heritage Assets.

The development would erode the rural edge of the Conservation Area, that separates it from the recent developments on Bailey Road, and Deerleap Lane (on the site of the former Keyline builders' merchants).

Because of its elevated position relative to the village, any development on this site would be visible from the village green (a local green space) and it would not be possible to mitigate its impact on the village green in order to comply with Rowlands Castle Neighbourhood Plan Policy 2 - Landscape Character and Views (significant view C6).

Development of this site would not comply with policy DM3 (Conservation Areas) paragraph DM 3.1 or paragraphs DM 3.2 c) and DM 3.2 d).

Page 444 - Summary of Reasons for Inclusion. Additional comments:

The site is in the Rowlands Castle Conservation Area, so mature trees *must* (and not '*could*') be retained. See policy DM3 'Conservation Areas'.

Page 444 - Infrastructure Requirements. Additional comments:

Access. The Developer Contributions should be towards accessibility to platforms and parking provision at Rowlands Castle train station as stated in in section 15 'Infrastructure Schedule' (page 81) of the 'Draft Local Plan 2021-2040 (Regulation 18) Emerging Infrastructure Plan' January 2024. There should also be a contribution for improvements to the mini-roundabouts at the junction of Whichers Gate Road, Redhill Road and Manor Lodge Road.

Points to note from Previous Versions of EHDC Local Plans

1. EHDC Local Plan Second Review – 2006. The draft version of this Local Plan which was submitted for public consultation included a Reserve Site for 'Land at Deerleap' covered the area of sites 'RLC1 – Land at Deerleap (north)' and 'RLC2 – Land at Deerleap (south). It included:

- Northern Land – 17 properties
- Southern Land – 30 dwellings:
 - 12 - 2-bedroom flats
 - 10 - 2/3-bedroom houses
 - 5 - 2-bedroom flats
 - 3 - 5-bedroom houses

It also included a footpath and cycle way through part of the flint boundary wall and across the adjoining Rowlands Castle Village Green. See at the end of this document Annex A, the 'Plan for Deerleap submitted for EHDC Local Plan Second Review – 2006'.

At the request of the Inspector, this Reserve Site was deleted from the Local Plan that was subsequently adopted in 2006. See at the end of this document Annex B, the 'Inspector's report for Deerleap for EHDC Local Plan Second Review – 2006'.

2. East Hampshire District Local Plan - Housing and Employment Allocations Plan' – April 2016. The 'Strategic Housing Land Availability Assessment (SHLAA)' in 2015 included site 'RC002 – Land at Deerleap' with an estimated area of development of 0.7 hectares and a potential housing capacity of 17 dwellings. The site was not included for allocation in the draft version of the Local Plan, and at the Local Plan Inquiry hearings held between 26 October and 30 October 2015, a planning consultant engaged by the owner, argued that the site should be included. However, the examiner's report of 15th February 2016 shows that the site would not be included in the plan.

RLC3 – Land at Oaklands House

Page 446 - List of Constraints & Opportunities. Additional comment on one aspect:

Biodiversity. The site is designated as 'National Habitat Network All Habitats Combined (England) – Network Enhancement Zone 1'

Page 447 - Summary of Reasons for Inclusion. Additional comments.

1. There must be no development on the 'Oaklands Meadow' SINC, in order to comply with Policy NBE2: Biodiversity, Geodiversity and Nature Conservation. This SINC occupies about 1.8 hectares of the southern part of the site adjacent to Whichers Gate Road, and covers about 50% of the total area of the site.

2. The housing density should be consistent with that of the development on the adjoining Woodlands Avenue and Oak Tree Close, which has a density of 19 dwellings/hectare, but which includes a significant amount of public open space including an attenuation pond.
3. There should be an area of Public Open Space surrounding the protected oak tree at the centre of the developable area of the site.
4. Consideration could be given to providing at least part of the ‘Oaklands Meadow 1 & 2’ SINC as Public Open Space’ provided this would not have an adverse impact on the SINC.
5. The development is on the edge of the countryside within the Rowlands Castle parish and should therefore reflect the more rural feel, appearance and sense of place shown in general by properties in Rowlands Castle.
6. Further comments on this site are contained in Rowlands Castle Parish Council’s response in December 2021 to the consultation on certain sites being considered for allocation in the version of the then emerging Local Plan. This site was then referred to as ‘SA39’. That earlier response from RCPC is included as an attachment to this response on the latest draft Local Plan for completeness in case it is not held on the EHDC site information database.

Page 447 - Infrastructure Requirements. Additional comments:

Access:

- Woodlands Avenue, including the three-arm roundabout where the proposed site access would be, is an unadopted road for which a management company is responsible. There would be a need for the management company to permit residents of the proposed site to use Woodlands Avenue.
- A link must be provided from the site to the footpath along the northern boundary of the site which links with Bridleway 24 to facilitate access to the centre of the village and its amenities without the need to use a car. This footpath could be upgraded to accommodate cyclists so that, by using Bridleway 24, cyclists would not need to use the busy main roads to reach the village centre.
- The Developer Contributions should be towards accessibility to the Down platform and improved parking provision at Rowlands Castle station as stated in in section 15 ‘Infrastructure Schedule’ (page 81) of the ‘Draft Local Plan 2021-2040 (Regulation 18) Emerging Infrastructure Plan’ January 2024. There should also be a contribution for improvements to the mini-roundabouts at the junction of Whichers Gate Road, Redhill Road and Manor Lodge Road and for the improvement of Bridleway 24 to enable pedestrian use in all weathers.

RLC4 – Land at Little Leigh Farm

Page 449 - List of Constraints & Opportunities. Additional comments as follows:

Biodiversity. The site is designated as National Habitat Network All Habitats Combined (England) – Network Enhancement Zone 1’

Page 450 - Summary of Reasons for Inclusion. Additional comment:

Suggestions relating to the layout of this site and the design of dwellings and streets are contained in Rowlands Castle Parish Council's response in December 2021 to the consultation on certain sites being considered for allocation in the version of the then emerging Local Plan. This site was then referred to as 'SA41'. That earlier response from RCPC is included as an attachment to this response on the latest draft Local Plan for completeness in case it is not held on the EHDC site information database.

Page 450 - Infrastructure Requirements. Additional comments:

1. Education. The site is actually within the catchment area of Rowlands Castle St. John's Church of England Controlled Primary school and children from Havant attend that school. However, there are limited places available and so the majority of educational places should be found within the Havant Borough Council Area.
2. Access.
 - The design and location of the access from Prospect Lane should recognise the rural nature of the landscape of the Lane rather than being a suburban access road and it should respect the design of the 19th Century Prospect Farm Cottage which would be in close proximity to an access.
 - Prospect Lane is designated as a bridleway and is known as Shipwrights Way and Stansted Way and it also forms part of National Cycle Route 22. There are stables on both sides of Prospect Lane. Accordingly, the lane must safely accommodate all users (vehicles, pedestrians, cyclists, horse riders and horses). The road should not be widened for vehicles, but a pedestrian footpath/cycle way should be constructed.
 - If the layout of Prospect Lane is to be changed the mature landscape barriers must be retained. This would include the trees, recognising that the Lane is in the 'strategic gap' between Rowlands Castle and Havant (Rowlands Castle Neighbourhood Plan Policy 1 (Gaps between Settlements)).
 - Signs should be placed at both ends of this narrow part of Prospect Lane, stating there is a width restriction allowing only cars and small vans to use it except for access. By keeping it narrow the majority of motorists would be discouraged from using it and would turn southwards when leaving the site.
 - This site is within the catchment area of St. John's Church of England Controlled Primary School, Whichers Gate Road, Rowlands Castle and so parents/carers and children from this development who attend this school would have to travel along it by foot or by car to reach the school the grounds of which has no parking for other than vehicles owned by staff. The addition of a pedestrian footpath/cycle way would benefit parents/carers and children.
 - It is nevertheless possible that there would be an increase in traffic on Prospect Lane arising from vehicles which would use it to travel north-eastwards and thence north-westwards or south-eastwards along Whichers Gate Road. Therefore, the capacity, design and layout of the stretch of Prospect Lane between the proposed site access and Whichers Gate Road must be given very careful consideration. The following factors must be considered:
 - The visibility splay and layout of the junction of Prospect Lane and Whichers Gate Road must be assessed because of the increased traffic arising from this development and poor visibility to the right on leaving Prospect Lane.

- Part of Prospect Lane about 100 metres south of its junction with Whichers Gate Road lies within a Flood Zone 3 where a main river crosses the road. Measures should be taken to mitigate the impact of flooding on the additional traffic arising from this development. Flooding is very likely to increase at this point because of increased and intense rain so this aspect also needs good mitigation, perhaps a proper culvert under the road if the lie of the land permits it.
- There should be developer contributions towards accessibility to the Down platform and improved parking provision at Rowlands Castle train station as stated in in section 15 'Infrastructure Schedule' (page 81) of the 'Draft Local Plan 2021-2040 (Regulation 18) Emerging Infrastructure Plan' January 2024. There should also be a contribution for improvements to the mini-roundabouts at the junction of Whichers Gate Road, Redhill Road and Manor Lodge Road and for improvements to Bridleway 24, which leads to the centre of Rowlands Castle from the NE end of Prospect Lane. The surface of the bridleway needs upgrading so it can be used by pedestrians and cyclists in all weathers.

DRAFT LOCAL PLAN 2021-2040 (REGULATION 18) POLICY MAPS

Page 31 of 34 - Policies Map for Rowlands Castle. The Settlement Policy Boundary for Rowlands Castle should be further amended to include the following:

- The site for EHDC Planning application: 53322/007 - Development of 61 dwellings, with associated private and communal amenity space, garages, parking, internal roads, pathways, sustainable urban drainage, landscaping and associated works (amendments and additional information received 16/03/23) - Land North of Bartons Road, Rowlands Castle, Havant - Permission for this site is awaited.
- Spire Hospital, Bartons Road
- The Oaks Crematorium, Bartons Road

The Policies Map should also be amended to exclude the 2 Deerleap Sites if the decision is made to exclude those 2 sites from the list of Site Allocations after this consultation.

EHDC DRAFT LOCAL PLAN 2021-2040 – COMMENTS ON APPENDICES

Appendix A: Background Information

Page 485: How will the new Local Plan affect and support Neighbourhood Plans?

This includes:

'As the Plan moves forward, the current neighbourhood plans may need to be reviewed to bring them in line with the new Local Plan. Alton Neighbourhood Plan is currently being reviewed with a view to **complimenting** the emerging Local Plan including identifying sites for development.'

The word in blue font must be replaced by '**complementing**'.

Appendix B: Abbreviations and Glossary

Definitions of the following should be added:

- Local Green Space – referred to on pages 274, 441, 446, and 447
- Rural Exception Sites
- Transport Assessment - referred to in paragraph 8.39 on page 194
- Transport Statement – referred to in paragraph 8.39 on page 194
- Windfalls

In addition, the draft Local Plan does not use consistent terminology throughout with respect to 'permissions'. This category is variously described as 'existing planning permissions', 'current planning permissions', 'permissions' and 'outstanding permissions'. The 'Glossary' does not give the definition of any of these terms. It is proposed that two definitions be used, that of 'Approved permissions' where the LPA has approved the application and 'Outstanding permissions' where an application has been made but has not yet been approved by the LPA.

Appendix F: Vehicle Parking Standards

- Page 502 includes:

'The parking standards of the following tables are minimum requirements for new development proposals'

It is proposed that these standards should also apply to the new use of a building whose use is changed.

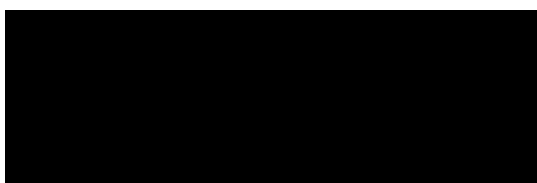
- Page 507 Petrol Stations. This refers to 'section 5.5' where further detail is provided, but there is no such 'section 5.5' in this part of the Local Plan.

The parking standards should include spaces for staff, especially where the building provides significant retail facilities. Staff that arrive by car will reduce spaces provided for visitors and there will be those who do not want fuel and so will not park at a pump space.

- Page 511. It must be recognised that many places of worship do not have 'fixed' seats such as pews and so there must be a clear standard set for such places. As it stands this standard would not apply to places with no fixed seats, leaving a hole in setting requirements, which must be addressed.

Appendix G: Table of Local Plan Policies

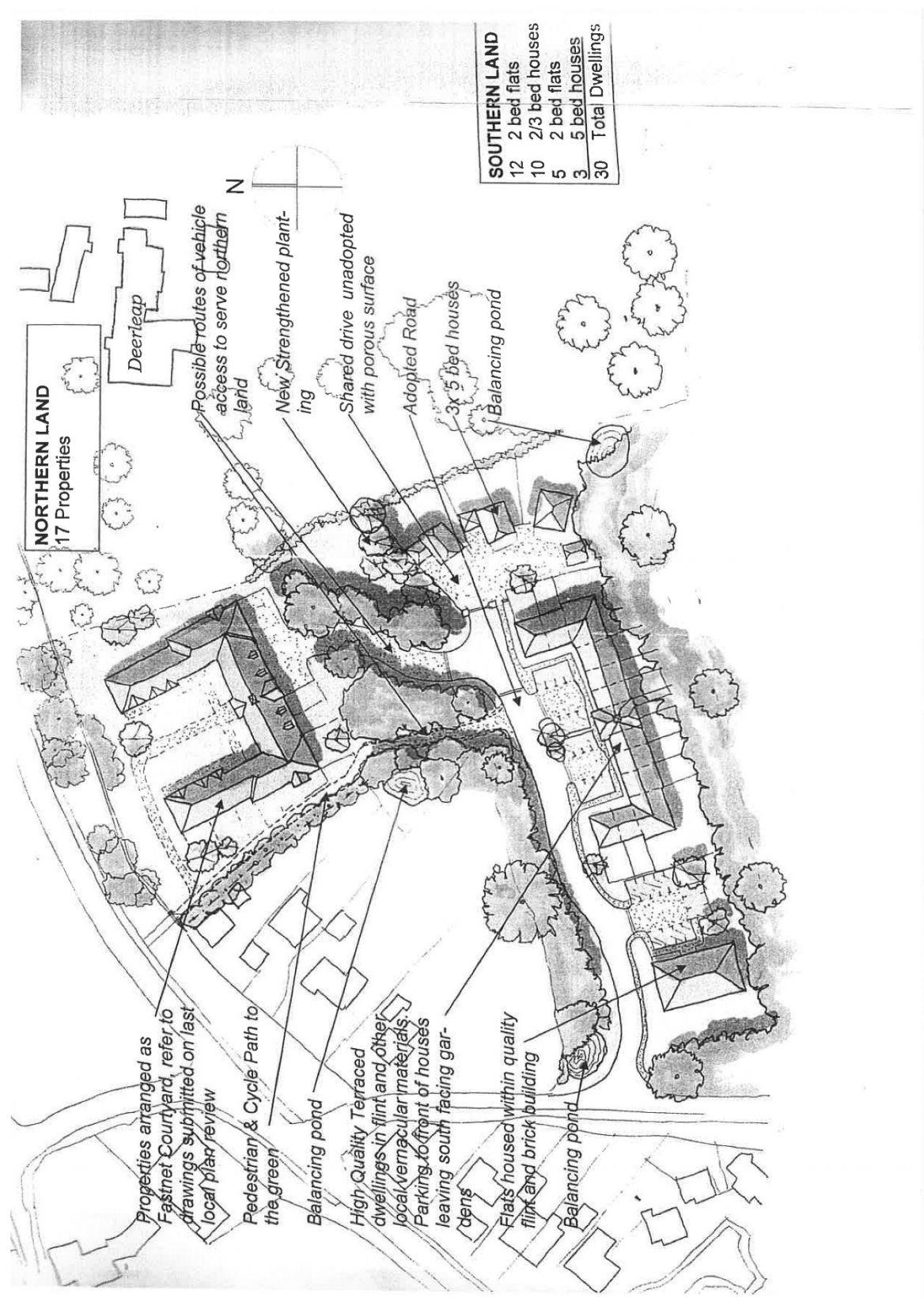
- Page 521. This indicates that the only replacement for policy 'CP27-Pollution' is 'DM13 – Air quality'. However, CP27 has a much wider scope than 'air quality'. For example, it includes requirements relating to loss of privacy and lighting schemes. It would appear that it is also replaced by 'DM11- Amenity'. It should be specified if it is replaced by other policies relating to, for example, lighting.



Clerk to Rowlands Castle Parish Council
29th February 2024

Annex A – The Plan for Deerleap submitted for EHDC Local Plan Second Review – 2006
Annex B – The Inspector's report for Deerleap for EHDC Local Plan Second Review – 2006
Annex C – RCPC Response to EHDC's Consultation on Site SA39 (Land at Oaklands House) – 2021
Annex D – Response to EHDC's Consultation on Site SA41 (Little Leigh Farm) – 2021

Annex A: Plan for Deerleap submitted for EHDC Local Plan Second Review – 2006



**ANNEX B: 'EXAMINER'S REPORT FOR DEERLEAP FOR EHDC LOCAL PLAN
SECOND REVIEW – 2006'**

ROWLANDS CASTLE

RESERVE, DELETED AND OMISSION SITES

Objections

As set out in the Annex at page 92.

THE RESERVE SITE -LAND AT DEERLEAP-HAR12

Latest Proposed Change

As set out in Document CD1 1/12 at PIC033.5, FPC27, PIC036.5, PIC034.5, PIC035.5 and PIC042.5 (page 101).

Main Issues

- 1) Whether there is a need for additional housing in this settlement;
- 2) Whether this is an appropriate site for housing in terms, for example, of the effect of development on the Conservation Area, local roads, flooding and nature conservation.

Inspector's Reasoning and Conclusions

5.4.35 Rowlands Castle is the most southerly settlement in the District, being about 5 km from Havant Town Centre. It is a relatively well-contained large village with a main line railway station with 2 trains an hour to Portsmouth and London (Waterloo). It has a more limited hourly bus service to Emsworth via Havant (Route 27) between 0800 and 1800 hrs. It has a primary school, public houses, some shops, employment and a range of community facilities. In the Council's hierarchy of settlements it is in Group 2. I agree that Rowlands Castle is a reasonably sustainable location that, in principle, should be able to accommodate a modest increase in its housing stock. In view of Structure Plan housing requirements and the significant degree of sustainability of this settlement, I accept that there is a need to find suitable land here for an appreciable amount of residential development.

5.4.36 I turn now to matters raised in the second issue, of which the effect of development on the character or appearance of the Rowlands Castle Conservation Area is especially important. The Green is the historic centre of the village, and this attractive open space is the focus of this Area. Its boundaries embrace the plots of houses fronting the north of The Green and, to the south, the extensive grounds and paddock attached to the house known as Deerleap. The remains of the Motte and Bailey castle, a Scheduled Ancient Monument (SAM), also lie within the Area, most being in the grounds of Deerleap.

5.4.37 The Latest Proposed Change envisages 30 dwellings on this green field Reserve Site that comprises a paddock of about 0.8 ha. It is close to the village centre, its shops and the railway station, and is about 1 km from the school. Access would be from a road that serves a large and busy builders' merchant premises (Keylme) sited within woodland to the south. The Council considers that development here, provided it was of a very high standard, would be acceptable. But I am not persuaded that it could be undertaken in such a way as to preserve or enhance the character or appearance of the Conservation Area.

5.4.38 The site is enclosed by trees and hedges, and so it would be difficult to discern any development on it during the summer from The Green. But I think it highly likely that parts of the scheme would be seen during the winter months, when there is less leaf cover, through the tracery of trees and hedges. It would most certainly be visible from the bridleway/road, from which access would be gained, at all times of the year. The Council and the few supporters of the allocation place too much emphasis on the likely appearance of the development. That is not enough. It is also important to have regard to its actual presence, especially when a vital criterion is the effect on the Conservation Area.

5.4.39 The Council's Conservation Area leaflet recognises the importance of the grounds of Deerleap in contributing to the character and appearance of the Area. They are recognised as *a basic landscape component to the village as forming a firm rural edge to its southern side*. That assessment is not challenged, and I endorse it. The openness of the grounds, including the paddock, is crucial in any appreciation of that character and appearance. The designation of a Conservation Area does not proscribe development from taking place, but the Planning (Listed Buildings and Conservation Areas) Act 1990 Section 72 requires, in essence, that a scheme must preserve or enhance the special qualities that led to designation. In 1997, an Inspector dismissed an appeal against the refusal of planning permission for a mews development adjacent to the house "Deerleap" because of the harm that it would cause to the Conservation Area. That decision is still relevant, in that I agree with that Inspector's assessment of the special qualities of the Conservation Area and the harm that residential development would have on it.

5.4.40 Irrespective of the degree to which it might be seen, the actual presence of development on this Reserve Site would materially detract from the open character of this part of the Conservation Area, and from that Area in its entirety. It would irretrievably erode *the firm rural edge* of the Conservation Area and the setting of the village hereabouts to a degree that it would be profoundly harmful to both. Development of this land as proposed would fly in the face of the relevant legislation that is designed to protect these Areas. It should not be countenanced.

5.4.41 The Council rightly sees matters of flooding and traffic as important and requiring more attention, and accepts that these could be addressed at the development brief or detailed application stage. The responsible agencies, however, raise no objection in principle to development on these grounds. **English Heritage's** original objection that development would harm the SAM, is withdrawn following the change to the eastern boundary of the allocation. The land does not qualify as a Site of Nature Conservation Interest (SINC) and so this type of interest could presumably be safeguarded under SDDP Policy CS. Accordingly, I find no sustainable objection to the allocation on these grounds. Presence and effect on the Conservation Area are by far the prime considerations.

5.4.42 This proposed allocation has attracted more objections than any other SDDP

proposal or policy, That does not surprise me, and I agree with the *gist* of the representations made. The deletion of this site from Table H2 means that alternative land should be sought. I discuss this below.

Recommendation

5.4.43 I recommend that the SDDP be modified by the deletion of the Reserve Site . at Deerleap from Table H2.

Rowlands Castle Parish Council

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Annex C:

Response to EHDC's Consultation on Site SA39 (Land at Oaklands House) for Emerging Local Plan – December 2021

Site name
Land at Oaklands House, Rowlands Castle – (EHDC reference SA39)
Name of Parish/Town council responding
Rowlands Castle Parish Council (RCPC)
<p>In responding to these questions, the Parish Council defined the following general principles, recognising that the EHDC Local Plan (Regulation 18) proposed that this site would be allocated for development 2033-34 to 2035-36 and that consequently the dwellings would be occupied in to the 22nd century and should be designed accordingly:</p> <ul style="list-style-type: none">• Housing density to be kept to a quality of life enhancing limit of 15 dwellings per hectare of developable land. The site would be on the edge of the Rowlands Castle Settlement and surrounded on 3 sides by a rural landscape, and such a density would provide a transition from the rural countryside to a less intense development.• Inclusion of eco-friendly features including: grass/matrix pavements, double/triple glazing, roof insulation, passive heating, heat pumps, integral solar panels, rain water collection, harvesting and res-use of grey water.• Provision of private residential gardens for relaxation, growing of plants and vegetables, drying washing etc (Policy S27 g)).• Plenty of parking commensurate with a modern, semi-rural life (on average spaces 2.5 per household).• Incorporation of parking bays and laybys (of generous size) into the design and layout where necessary.• Design features and dimensions to add character and enhance the appeal of (all) the houses (e.g. finials, flint features, brick garden walls, weatherboarding, etc.). (Policy S27 d)).• Variation in styles and distribution of houses to break up uniformity of the streets and add character and identity to them.• Quality of build, brickwork and finish for long-term aesthetic appeal, irrespective of a dwelling's type of tenure. (Policy S27 d)).• Overarching aim to create homes that people will value and care for over a long term, resulting in safe, harmonious, and attractive neighbourhoods• Provision of Public Open Spaces that are overlooked by the front of dwellings. (Policy S27 b) and d)).• The development should utilise local materials, architects and businesses as much as possible to tie the development to Rowlands Castle and reduce carbon footprint.• With its elevated position and sloping landscape with the large central oak tree as a natural focal point and surrounded by attractive woodland, the site provides an excellent opportunity to be a model estate with eco-friendly features and to serve as a template for other developments. The design and layout of the site must be sympathetic to this topography.

1. What are the important natural, historical, heritage and landscape features of the site and its environs? Please list and/or describe them

- a. A large oak tree at the centre of the site subject to Tree Preservation Order (TPO) ([EH1121](#))19.
- b. The 'Oaklands Meadow 1 & 2' (Reference EH0242) Site of Important Nature Conservation (SINC) occupies about 1.8 hectares of the southern part of the site adjacent to Whichers Gate Road, and there must be no building on this as is required by EHDC Local Plan Joint Core Strategy (2014) policy CP21 'Biodiversity' which states: 'New development will be required to: a) maintain, enhance and protect district wide biodiversity, in particular the nature conservation designations..... iii) Sites of Importance for Nature Conservation (SINC) (Hampshire)'. This SINC covers about 50% of the total area of the site.
- c. Within this SINC there are a Beech (T3) and Goat Willow tree (T5) subject to TPO (EH1121)19.
- d. Along the northern boundary of this SINC and the open field there are two individual Oak trees (T2 and T4), and a group of eight Oak trees, and all ten of these are also subject to TPO (EH1121)19. Any development must not impact these trees or their root protection areas by, for example, constructing a roadway through them.
- e. Adjoining the eastern boundary of the site is the Oaklands Woodland SINC (Reference EH0247) and any development must not adversely affect this.
- f. The north-western boundary of the site is with the land adjoining Woodlands Avenue which was designated as 'Open Space' in EHDC Planning Application 30016/18, so the development must not encroach on this attractive feature and should retain the hedgerow along the boundary.
- g. The landscaping design should, where appropriate, demonstrate how the Rowlands Castle Local Landscape Character Assessment (2012) has been taken into account.
- h. The design should:
 - Conserve and enhance those features that contribute to the character, pattern and evolution of the landscape.
 - Respect natural features.
 - Not have an adverse effect on the visual quality of the landscape.
 - Conserve and enhance the parish Network Opportunity Areas identified in the 2019 East Hampshire Green Infrastructure Strategy

2. What do you think is valuable about the features that you listed in your response to question 1?

These features preserve the rural aspects from and to the site. They are to the benefit of residents in the long term because they would enhance the quality of life and provide a sense of wellbeing arising from a connection with the countryside.

3. If there are views into or from the site that are particularly important for you, please describe these views (what you can see and from where) and say why they are important to you.

- a. The panoramic view from the higher part of the recently constructed footpath along the northern boundary of the site and leading to Bridleway 24, southwards over the site, over the Oaklands Meadow 1 & 2 SINC and the wooded areas, and Whichers Common towards Havant.
- b. Views from within the site and from Woodlands Avenue over the steeply sloping site, towards the Oaklands Woodland SINC. This includes the focal point of the much admired oak tree in the centre of the open part of the site.
- c. The site should remain screened by the hedgerow and trees along its boundary with Whichers Gate Road.

4. From where (i.e. from which road(s) and/or point(s) on the site's boundary) should vehicles gain access to the site?

Vehicular access should only be from the roundabout at the junction of Woodlands Avenue and Oaktree Close.

<p>5. From where (which path(s) and/or point(s) on the site's boundary) should pedestrians gain access to the site?</p>
<p>a. There should be pedestrian access from the roundabout at the junction of Woodlands Avenue and Oaktree Close.</p> <p>b. A link for pedestrians could be provided from the site to the recently constructed footpath along the northern boundary of the site. This would facilitate access to Bridleway 24 and enable the centre of the village and its amenities to be reached on foot.</p>
<p>6. Are there any opportunities for increasing access by cycle modes in addition to the access points identified under questions 4 and 5? If so, please give details of where these opportunities are on the site's boundary</p>
<p>The link referred to above in 5a, could be extended to accommodate cyclists so that by using Bridleway 24, cyclists would not need to use the busy main roads to reach the village centre.</p>
<p>7. What type(s) of housing do you think would be most appropriate for the site from the following list: detached, semi-detached, terraced, flats? Please identify as many types as you think are suitable and explain why.</p>
<p>a. To cater for the needs and aspirations of a wide community, the site should provide high quality mainly detached and semi-detached dwellings and some terraced dwellings.</p> <p>b. There should also be some bungalows and ground floor apartments suitable for elderly/disabled people and perhaps properties suitable for those who wish to downsize within Rowlands Castle but are unable to find a smaller property close to the village. The need for such accommodation was clearly identified in the Housing Needs Survey undertaken for our emerging Neighbourhood Plan. Such accommodation should include wider doorways, level access, space provision for future internal lifts, accessibility for wheelchairs etc. These features could be provided for at the design stage at very low cost and will allow extended age living whilst still looking like standard housing for all. There should be conditions preventing bungalows from being extended to include additional floors to maintain their original purpose and encourage down-sizing by those looking to do so.</p> <p>c. The type of housing should accommodate the following tenures: Market (Freehold), Affordable (Social Rent and Intermediate, and age-related).</p>
<p>8. Are there parts of the site that would be more suitable for new homes than others? If so, please give details of which parts (e.g. northern, southern etc.) are more suitable and explain why</p>
<p>a. Only the part of the site outside the 'Oaklands Meadow 1 & 2' SINC (about 1.7 hectares) would be suitable for the development of new homes because the SINC should be preserved. In accordance with the 'Principles' defined above, this part of the site would accommodate about 30 new homes. This provides a density consistent with that of the adjoining 'Land South of Oaklands' (now Woodlands Avenue and Oak Tree Close) development which has a density of 19 dwellings/hectare, but unlike this part of this site, it includes a significant amount of public open space including an attenuation pond.</p> <p>b. All age-related accommodation should be constructed in proximity to the lowest part of the site adjacent to Woodlands Avenue to avoid the need to walk up the sloping site. Such accommodation is likely to be single-storey bungalows and so they would not significantly prevent views over the site to the surrounding woodland or the central oak tree.</p>
<p>9. Where should other land uses (such as public open space, new community buildings and shops (if proposed)) be located on the site, in relation to new homes? Please explain your answer.</p>
<p>The following Public Open Space amenities should be provided:</p> <p>a. There should be an area of Public Open Space surrounding the oak tree at the centre of the developable area of the site.</p> <p>b. Only the fronts of dwellings should face and overlook the Public Open Space (POS) surrounding the central oak tree. The streets would be in front of the dwellings, and the POS would be on the opposite side of the streets. (Policy S27 b) and e)). See Appendix A, Figures</p>

1, 2 and 3.

- c. The POS must be provided on the site in advance of dwellings being occupied and must be accessible to all including people with disabilities.
- d. Boundaries of the POS should protect them for their proper use. For example, measures should be implemented to prevent unregulated and anti-social parking.
- e. Public seating should be provided.
- f. A scheme for the ongoing maintenance and management of the POS must be provided.
- g. Consideration could be given to providing at least part of the "Oaklands Meadow 1 & 2' SINC as Public Open Space' provided this would not have an adverse impact on the SINC.

10. A location plan image of the site at an appropriate scale has been e-mailed to your clerk. If you feel comfortable in doing so, you may annotate this plan (either electronically, if you have access to appropriate software, or by drawing on a printed-out version) to clarify your answers to questions 1-9. If you intend to supplement your answers with an annotated plan or drawing, please upload a scanned copy here.

N/A

11. If you were to think about the design of any new streets on the site, how do you think they should appear? You might wish to consider whether the new homes should be set back a constant distance, or whether this should vary; how much tree cover you might expect; how enclosed by buildings the streets should be; how the boundaries of new homes might be dealt with. If desired, please upload any photos of good examples.

a. Design of streets:

- The streets should be curved to provide more visual appeal.
- They should be wide enough to allow cars to pass unimpeded any cars parked along the road. This would discourage the parking of cars partially on the pavement.
- The pavements should be of tarmacadam on only one side of the roads, and of grass on the other to make the street scene more attractive. See Appendix A, Figures 4 and 6.
- To enhance the appearance of the streets (and possibly provide traffic calming), a variety of surfaces should be provided. See Appendix A, Figure 2.
- The streets should be lined with as many trees as possible to provide shade and to improve appearances, and where possible, incorporate rain gardens to cope with the predicted climate change. The 'Planning for the Future White Paper' stated: ' We will also deliver our commitment to make all new streets tree-lined, by setting clear expectations through the changes to the National Planning Policy Framework which will be consulted on in the autumn, and informed by the outcome of this summer's consultation on the England Tree Strategy'.
- The streets, surface and foul water drainage should be constructed to adoptable standards.

b. Design of housing:

- The streets should be curved to provide more visual appeal.
- They should be wide enough to allow cars to pass unimpeded any cars parked along the road. This would discourage the parking of cars partially on the pavement.
- The pavements should be of tarmacadam on only one side of the roads, and of grass on the other to make the street scene more attractive. See Appendix A, Figures 4 and 6.
- To enhance the appearance of the streets (and possibly provide traffic calming), a variety of surfaces should be provided. See Appendix A, Figure 2.
- The streets should be lined with as many trees as possible to provide shade and to improve appearances, and where possible, incorporate rain gardens to cope with the predicted climate change. The 'Planning for the Future White Paper' stated: ' We will also deliver our commitment to make all new streets tree-lined, by setting clear expectations through the changes to the National Planning Policy Framework which will be consulted on in the autumn, and informed by the outcome of this summer's consultation on the England Tree Strategy'.
- The streets, surface and foul water drainage should be constructed to adoptable standards.

12. How would you expect car parking to be dealt with on the site from the following list: on residential plots (e.g. driveway or garage); within parking bays along a street; within a parking courtyard in front of new homes; within a rear parking courtyard; by a mix of these approaches across the site; by another approach (please specify)? Please explain the reason(s) for your choice

- a. Car parking should wherever possible be on residential plots for ease of access by residents and to facilitate the overlooking of parked cars for security reasons.
- b. If car parking has to be provided within a courtyard either in front of or to the rear of dwellings which cannot have a driveway and garage, it should not have to accommodate a large number of vehicles. The following features should be provided to minimise the visual impact of such parking:
 - Between pairs of parking bays there should be a landscaped strip within which small bushes or shrubs would be planted. Arrangements would have to be made for the long-term maintenance of these. See Appendix A, Figure 7.
 - Instead of delineating parking bays with white paint lines, more aesthetically pleasing setts, metal studs or lines of timber should be used.
 - To prevent vehicle parking from visually dominating the streetscape, along the boundary of parking courtyards and streets, brick walls (and not wooden fences) to match adjoining dwellings should be built (except along the entrance to the courtyard) or tall hedgerows should be planted. See Appendix A, Figure 7.
- c. Parking in courtyard to the rear of dwellings should still be overlooked for security reasons. See Appendix A, Figure 8.
- d. Laybys should be provided for use by visitors as along Woodlands Avenue in Rowlands Castle.
- e. Measures to reduce 'residual parking' should be implemented.
- f. Car parking design should accommodate EV charging points either on the plot of a dwelling or in adjacent car parking areas such as courtyards.
- g. Evidence from recent developments in Rowlands Castle is that the residential parking standards in the EHDC Vehicle Parking Standards Supplementary Planning Document (July 2018) do not require the provision of sufficient residential and visitor parking spaces. Therefore, when a planning application is submitted, an assessment should be undertaken of how many parking spaces should be provided on the site.

13. Having listened to, or watched the recording of the developer's presentation about their vision for the site, did you agree with their proposals? Please explain your answer.

Not applicable because there was no developer's presentation made to support this consultation by EHDC.

By ticking this box, you acknowledge that this form will be submitted to East Hampshire District Council on behalf of your parish or town council and used by the planning policy team to inform the emerging Local Plan. The information you have supplied may be shared with the Planning Inspectorate and published only as part of the Council's evidence base for its Local Plan. All comments submitted as part of the consultation will be used in line with our Planning Policy Privacy Notice and kept according to our Retention Schedule, both of which can be found on our website (www.easthants.gov.uk/draft-local-plan)

Appendix A

Figure 1 – Dwellings with fronts adjoining access road and facing Public Open Space – Oak Tree Close, Rowlands Castle



Figure 2 – dwellings with fronts adjoining access road and facing Public Open Space – junction of Woodlands Avenue and Oak Tree Close, Rowlands Castle. This also shows different road textures



Figure 3 – dwellings with fronts adjoining footpath and facing Public Open Space, Woodlands Avenue, Rowlands Castle.



Figure 4 – grass pavement on one side of road and tarmac pavement on the other side - Oak Tree Close, Rowlands Castle



Figure 5 – brick and flint dwelling



Figure 6 – grass pavement – Oak Tree Close, Rowlands Castle



Figure 7 – Parking bays separated by landscaped strips – Oaklands Avenue, Rowlands Castle



Figure 8 – Courtyard Parking to rear of dwellings, but still overlooked – Woodlands Avenue, Rowlands Castle



Rowlands Castle Parish Council

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Annex D

Response to EHDC's Consultation on Site SA41 (Little Leigh Farm) for Emerging Local Plan – October 2021

Site name
Land South of Little Leigh Farm, Rowlands Castle – (EHDC reference SA41)
Name of Parish/Town council responding
Rowlands Castle Parish Council (RCPC)
In responding to these questions, the Parish Council defined the following general principles: <ul style="list-style-type: none">• Housing density to be kept to a quality of life enhancing limit of 20 dwellings per hectare.• Plenty of parking commensurate with a modern, semi-rural life (2.5 per household)• Incorporation of parking bays (of generous size) into the design and layout where necessary• Design features and dimensions to add character and enhance the appeal of (all) the houses (e.g. finials, flint features, brick garden walls, weatherboarding, etc.). (Policy S27 d)).• Variation in styles and distribution of houses to break up uniformity of the streets and add character and identity to them.• Quality of build, brickwork, and finish for long-term aesthetic appeal. (Policy S27 d))• Inclusion of eco-friendly features such as grass/matrix pavements, double/triple glazing, roof insulation, integral solar panels, harvesting and re-use of grey water.• Overarching aim to create homes that people will value and care for over a long term, resulting in safe, harmonious, and attractive neighbourhoods• Provision of Public Open Spaces that are overlooked by the front of dwellings. (Policy S27 b and d).• Provision of private residential gardens for relaxation, growing of plants and vegetables, drying washing etc. (Policy S27 g)).
1. What are the important natural, historical, heritage and landscape features of the site and its environs? Please list and/or describe them
<ol style="list-style-type: none">a. Prospect Lane to the north of a proposed access has a rural nature. This should be retained.b. The trees and bushes along the boundary with Worldham Road should be retained except for the three short stretches where pedestrian routes would be provided as shown on the Illustrative Master Plan.c. Along the boundary of the site with Prospect Lane, as stated in the Land Availability Assessment (LAA), there are mature landscape barriers (e.g. trees and bushes) and these should be retained and additional native species planted where there are no trees at present.d. The distinctive landscape vistas and the visual connectivity between the surrounding countryside and the site development should be maintained. Therefore, any additional planning along the eastern edge of the boundary should not be of a type which would grow to obscure the view from the dwellings over the surrounding countryside to the wooded landscape beyond. The planting should be sufficient to soften the visual impact of the dwellings from the surrounding countryside.e. It is noted that the Illustrative Master Plan shows a 15m buffer woodland strip at the northern edge of the site. However, this strip is outside the application site boundary ('red line') but

within the 'blue line' boundary indicating it is in the same ownership. It must, therefore, be specified that this woodland strip would be retained.

- f. Site boundaries should, where appropriate, be planted with locally native tree and hedge species in preference to walls and fences. These species should not be of a type which would grow sufficiently to excessively overshadow dwellings.
- g. The landscaping design should, where appropriate, demonstrate how the Rowlands Castle Local Landscape Character Assessment (2012) has been taken into account.
- h. The design should:
 - Conserve and enhance those features that contribute to the character, pattern and evolution of the landscape.
 - Respect natural features.
 - Not have an adverse effect on the visual quality of the landscape.
 - Conserve and enhance the parish Network Opportunity Areas identified in the 2019 East Hampshire Green Infrastructure Strategy

2. What do you think is valuable about the features that you listed in your response to question 1?

These features preserve the rural aspects from and to the site. They are to the benefit of residents in the long term because they would enhance the quality of life and provide a sense of wellbeing arising from a connection with the countryside.

3. If there are views into or from the site that are particularly important for you, please describe these views (what you can see and from where) and say why they are important to you.

- a. The views 1, 2a, 2b, 3 a, 3b, 4, 5,6 and 7 in the Landscape and Visual Impact Assessment (LVIA) (Figure 6) are important because they face towards and from land in the current strategic gap between Rowlands Castle and Havant and so contribute to the visual separation of these settlements. They demonstrate the visual appeal of the rural nature of the site and the surrounding countryside.
- b. View 1 demonstrates the rural nature of Prospect Lane which should be retained.

4. From where (i.e. from which road(s) and/or point(s) on the site's boundary) should vehicles gain access to the site?

- a. Vehicular access should be from Prospect Lane at the same location as the existing gate to the site.
- b. As stated in the Land Availability Assessment (LAA) (December 2018) the options for highway access to this site need to be tested.
- c. The Illustrative Master Plan presented at the workshop on 1st September 2021 showed a vehicular access onto Prospect Lane only about 20 to 25 m south of Stansted Close to the west of Prospect Lane. The access to this site (SA41) would serve between 100 and 115 dwellings while the two junctions of Stansted Close and Prospect Lane serve about 90 dwellings. The viability and safety of locating this site access so close to one of the Stansted Close accesses must be very carefully assessed and any junction designed accordingly.
- d. As stated in the HCC East Hants Site Assessment, Prospect Lane is predominately a narrow single-track road with an average width of 4m and soft verges to either side.
- e. The design and location of the access from Prospect Lane should recognise the rural nature of the landscape of the Lane rather than being a suburban access road, and it should respect the design of the 19th Century Prospect Farm Cottage which would be in close proximity to an access.
- f. The rural nature of Prospect Lane north of the site access must be retained. It is important to recognise that it is designated as a bridleway and is known as Shipwrights Way and Stansted Way and it forms part of National Cycle Route 22. There are stables on both sides of Prospect Lane. Accordingly, the Lane must safely accommodate all users (vehicles, pedestrians, cyclists, horse riders and horses). The road should not be widened for vehicles, but a pedestrian footpath/cycle way should be constructed.

- g. If the layout of Prospect Lane is to be changed, as stated in the LAA, the mature landscape barriers must be retained. This would include the trees, recognising that the Lane is in the 'strategic gap' between RC and Havant (EHDC JCS Policy CP23).
- h. Signs should be placed at both ends of this narrow part of Prospect Lane, stating there is a width restriction allowing only cars and small vans to use it. By keeping it narrow the majority of motorists would be discouraged from using it and would turn southwards when leaving the site.
- i. This site is at present within the catchment area of St. John's Church of England Controlled Primary School, Whichers Gate Road, Rowlands Castle and so parents/carers and children from this development who would attend this school would have to travel along it by foot or by car to reach the school the grounds of which has no parking for other than vehicles owned by staff. The addition of a pedestrian footpath/cycle way would benefit parents/carers and children.
- j. It is nevertheless possible that there would be an increase in traffic on Prospect Lane arising from vehicles which would use it to travel north-eastwards and thence north-westwards or south-eastwards along Whichers Gate Road. Therefore, the capacity, design and layout of the stretch of Prospect Lane between the proposed site access and Whichers Gate Road must be given very careful consideration. The following factors must be considered:
 - The visibility splay and layout of the junction of Prospect Lane and Whichers Gate Road must be assessed because of the increased traffic arising from this development. The large increase in traffic forecast for Whichers Gate Road because of new developments in Rowlands Castle and the sites allocated in the emerging Havant Borough Local Plan, must also be considered. It is acknowledged that the visibility on the south side of the junction could be restricted because of the property on the corner and its boundary wall.
 - Part of Prospect Lane about 100 metres south of its junction with Whichers Gate Road lies within a Flood Zone 3 where a main river crosses the road. Measures should be taken to mitigate the impact of flooding on the additional traffic arising from this development. Flooding is very likely to increase at this point because of increased and intense rain so this aspect also needs good mitigation, perhaps a proper culvert under the road if the lie of the land permits it.
 - It is understood that HCC and EHDC intend to use S106 contributions to improve the safety of the crossing from Bridleway 24 (Shipwrights Way/Stansted Way) across Whichers Gate Road and its junction with Prospect Lane. This would make the crossing safer for horse riders, horses and cyclists. These proposed changes should be coordinated with any changes to the junction of Prospect Lane and Whichers Gate Road being proposed for this site.
 - It is also understood that HCC may be implementing further traffic calming measures along Whichers Gate Road using another S106 contribution. Again, any changes proposed to this junction because of the traffic arising from this development must be consistent with those changes.

5. From where (which path(s) and/or point(s) on the site's boundary) should pedestrians gain access to the site?

- a. The pedestrian accesses and links shown as dotted yellow lines on the Illustrative Master Plan should be provided.
- b. A large stretch of the pedestrian link to the north of the site is outside the application site boundary ('red line') but with the same ownership as that of the site to be developed ('blue line'). It must be ensured that this pedestrian link would be provided when the site is developed and subsequently maintained.

6. Are there any opportunities for increasing access by cycle modes in addition to the access points identified under questions 4 and 5? If so, please give details of where these opportunities are on the site's boundary

The suggested pedestrian footpath/cycle way along Prospect Lane would encourage an increased use of cycles.

7. What type(s) of housing do you think would be most appropriate for the site from the following list: detached, semi-detached, terraced, flats? Please identify as many types as you think are suitable and explain why.

- a. To cater for the needs and aspirations of a wide community, the site should provide high quality mainly detached and semi-detached dwellings and some terraced dwellings.
- b. There should also be some bungalows and ground floor apartments suitable for elderly/disabled people and perhaps properties suitable for those who wish to downsize within Rowlands Castle, but are unable to find a smaller property close to the village. The need for such accommodation was clearly identified in the Housing Needs Survey undertaken for our emerging Neighbourhood Plan. Such accommodation should include wider doorways, level access, space provision for future internal lifts, accessibility for wheelchairs etc. These features could be provided for at the design stage at very low cost and will allow extended age living whilst still looking like standard housing for all.
- c. The type of housing should accommodate the following tenures: Market (Freehold), Affordable (Social Rent and Intermediate, and age-related).

8. Are there parts of the site that would be more suitable for new homes than others? If so, please give details of which parts (e.g. northern, southern etc.) are more suitable and explain why

- a. When identifying which parts of the site would be suitable for new homes, the housing density of the site should be considered. The density of the housing on the site should be consistent with that of the sites in Rowlands Castle Parish allocated in the EHDC Local Plan (Housing and Employment Allocations) (April 2016) according to the following policies:
 - RC1 - Land at former Rowlands Castle Brickworks, The Drift (now Bailey Road) - Density: **19** dwellings/ha. This area includes an attenuation pond and public open space
 - RC2 – Land South of Oaklands (now Woodlands Avenue and Oak Tree Close) – **19** dwellings/ha. This includes an attenuation pond and public open space.
 - RC3 – Land North of Bartons Road (Eastleigh House Cottages) Havant – **28** dwellings/ha. This does not include an attenuation pond and public open space

The development on the site of the former Keyline Builders Merchants in Rowlands Castle (approved on appeal in August 2014) (now Deerleap Lane) has a density of **13** dwellings/ha and this area includes an attenuation pond and public open space.

The net developable area should accommodate the following:

- Public Open Spaces (including a play area). The existing adjoining sites in Havant do not provide any public open space.
- A transition to a less intense development than that of the existing adjoining sites because it borders the rural countryside and the strategic gap between Rowlands Castle and Havant.
- Sufficient private garden space of, say, on average 40 sq. metres per dwelling
- Provision of SuDS (Sustainable Drainage Scheme) which could require an attenuation pond.
- If foul water drainage is to lead to sewers along Prospect Lane, pumps would have to be provided because the site slopes downwards to the east from Prospect Lane.

The EHDC Draft Local Plan (2017 – 2036) (Regulation 18) proposed for site SA41 a density of between **28** and **32** dwellings/ha which would not accord with the above principles. For example, it would not provide a significant area of POS.

The area of this site is 3.56 ha so, in order to accord with the principles defined at the start of this document, including a Density of **20** dwellings/ha, the number of dwellings that could be accommodated on the site would be approximately 71. The density of a development affects both its aesthetics and the long-term quality of life of its residents and so too dense a development would have an adverse effect. (See NPPF paragraph 122 d) and e)).

b. All age-related accommodation should be constructed in proximity to the access to Prospect Lane to facilitate access to public transport and where it would be on land at about the same level as Prospect Lane. The further East it is constructed the greater would be the slope that would have to be negotiated to reach Prospect Lane. The land closest to Prospect Lane is at an elevation of 40m AOD (Above Ordnance Datum), but it slopes eastwards to 25m AOD.

9. Where should other land uses (such as public open space, new community buildings and shops (if proposed)) be located on the site, in relation to new homes? Please explain your answer.

a. Public Open Space:

- Only the fronts of dwellings should face and overlook the Public Open Spaces (POS). The streets would be in front of the dwellings, and the POS would be on the opposite side of the streets. (Policy S27 b) and e)). See Appendix B, Figures 1, 2 and 3.
- POS must be provided on the site in advance of dwellings being occupied and must be accessible to all including people with disabilities.
- Boundaries of the POS should protect them for their proper use. For example, measures should be implemented to prevent unregulated and anti-social parking.
- Children's Play areas and equipment should be provided. These areas should be located in accessible places that are well overlooked but do not risk unacceptable disturbance to neighbours.
- The POS should meet the needs of the whole community.
- Public seating should be provided.
- A scheme for the ongoing maintenance and management of the POS must be provided.

b. Local amenities:

It would be anticipated that the dwellings on this site would generate a need for amenities (e.g. shops, restaurants, post office) so an assessment of how this increased demand could be met, considering the capacity of the existing local facilities, and the availability of public transport to reach such facilities. However, it may not prove to be practical to provide any such facilities on the site.

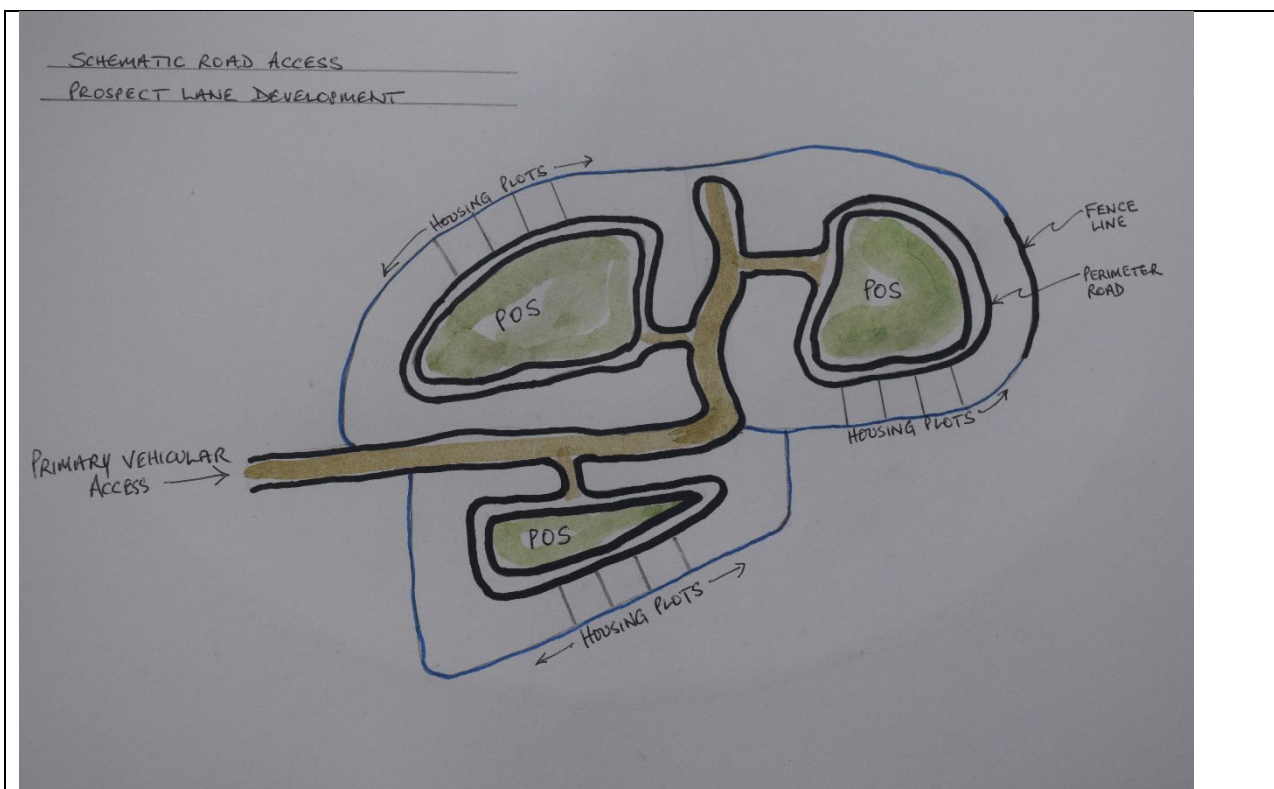
c. Community Facilities

It should be considered what community facilities must be provided on the site.

10. A location plan image of the site at an appropriate scale has been e-mailed to your clerk. If you feel comfortable in doing so, you may annotate this plan (either electronically, if you have access to appropriate software, or by drawing on a printed-out version) to clarify your answers to questions 1-9. If you intend to supplement your answers with an annotated plan or drawing, please upload a scanned copy here.

The following schematic depicts a design that would accord with the responses to the questions in this survey, and the principles defined at the start of this document. Particular features would include:

- There would be no road around the northern perimeter of the site as proposed in the Illustrative Master Plan.
- The existing and proposed planting and woodland features around the boundary of the site would remain as proposed in the Illustrative Master Plan.
- The pedestrian links depicted in the Illustrative Master Plan would remain.
- Public Open Spaces (POS) would be overlooked by the front of dwellings which would be on the opposite side of the road from the POS. See Appendix A.
- The east-west access road would be shorter and, therefore, more visually attractive than that proposed in the Illustrative Master Plan.
- If the rear gardens of any dwellings were to face or adjoin a road, for aesthetic reasons, the boundary could, for example, be a brick wall with shrubs or other landscaping along it.



11. If you were to think about the design of any new streets on the site, how do you think they should appear? You might wish to consider whether the new homes should be set back a constant distance, or whether this should vary; how much tree cover you might expect; how enclosed by buildings the streets should be; how the boundaries of new homes might be dealt with. If desired, please upload any photos of good examples.

a. Design of streets:

- The streets should be curved to provide more visual appeal.
- They should be wide enough to allow cars to pass unimpeded any cars parked along the road. This would discourage the parking of cars partially on the pavement.
- The pavements should be of tarmacadam on only one side of the roads, and of grass on the other to make the street scene more attractive. See Appendix B, Figs 4 and 6.
- To enhance the appearance of the streets (and possibly provide traffic calming), a variety of surfaces should be provided. For example, different surfaces (tarmac, block paving, cobbles) could be provided for each of the three groups of dwellings surrounding the Public Open Spaces shown in the schematic under question 10. See Appendix B, Figure 2.
- The streets should be lined with as many trees as possible to provide shade and to improve appearances, and where possible, incorporate rain gardens to cope with the predicted climate change. The 'Planning for the Future White Paper' stated: ' We will also deliver our commitment to make all new streets tree-lined, by setting clear expectations through the changes to the National Planning Policy Framework which will be consulted on in the autumn, and informed by the outcome of this summer's consultation on the England Tree Strategy'.
- The streets, surface and foul water drainage should be constructed to adoptable standards.

b. Design of housing:

- The development is on the edge of the countryside, within the current 'Strategic Gap' and within the Rowlands Castle parish and should therefore reflect the more rural feel, appearance and sense of place shown in general by properties in Rowlands Castle.
- The design and setting of the dwellings should be sympathetic to the design of the adjoining Prospect Farm Cottage which probably dates from the 19th century.
- The houses should be set back from the road at different distances to provide a variety of appearances.
- The dwellings should be of a variety of different styles ('patterns') and be constructed of a variety of materials which respond to the Rowlands Castle character of red brick and flint in

order to reinforce local distinctiveness. See Appendix B, Figure 5. The other Figures in Appendix B also demonstrate a variety of different styles and the dwellings are set back from the road at different distances.

- Boundaries of properties with the streets should be of the same style of brickwork as the dwelling or a hedgerow.
- The housing must exhibit green credentials which could include:
 - Solar panels and tiles which sit flush with and are well integrated into roofs, rather than panels retrospectively bolted to roofs.
 - Triple glazing
 - Facilities to make use of 'grey water'.
 - Incorporate heat pump systems and under-floor heating in dwellings

12. How would you expect car parking to be dealt with on the site from the following list: on residential plots (e.g. driveway or garage); within parking bays along a street; within a parking courtyard in front of new homes; within a rear parking courtyard; by a mix of these approaches across the site; by another approach (please specify)? Please explain the reason(s) for your choice

- a. Car parking should wherever possible be on residential plots for ease of access by residents and to facilitate the overlooking of parked cars for security reasons.
- b. If car parking has to be provided within a courtyard either in front of or to the rear of dwellings which cannot have a driveway and garage, it should not have to accommodate a large number of vehicles. The following features should be provided to minimise the visual impact of such parking:
 - Between pairs of parking bays there should be a landscaped strip within which small bushes or shrubs would be planted. Arrangements would have to be made for the long-term maintenance of these. See Appendix B, Figure 7.
 - Instead of delineating parking bays with white paint lines, more aesthetically pleasing setts, metal studs or lines of timber should be used.
 - To prevent vehicle parking from visually dominating the streetscape, along the boundary of parking courtyards and streets, brick walls (and not wooden fences) to match adjoining dwellings should be built (except along the entrance to the courtyard) or tall hedgerows should be planted. See Appendix B, Figure 7.
- c. Parking in courtyard to the rear of dwellings should still be overlooked for security reasons. See Appendix B, Figure 8.
- d. Laybys should be provided for use by visitors as along Woodlands Avenue in Rowlands Castle.
- e. Measures to reduce 'residual parking' should be implemented.
- f. Car parking design should accommodate EV charging points either on the plot of a dwelling or in adjacent car parking areas such as courtyards.
- g. Evidence from recent developments in Rowlands Castle is that the residential parking standards in the EHDC Vehicle Parking Standards Supplementary Planning Document (July 2018) do not require the provision of sufficient residential and visitor parking spaces. Therefore, when a planning application is submitted, an assessment should be undertaken of how many parking spaces should be provided on the site.

13. Having listened to, or watched the recording of the developer's presentation about their vision for the site, did you agree with their proposals? Please explain your answer.

- The presentation showed the Illustrative Master Plan, but little explanation was given about it. For example, it was not stated how many dwellings were proposed for the site. To determine that, it was necessary to consult the EHDC Draft Local Plan (2017 – 2036) (Regulation 18) that indicated there would be 100 to 115 dwellings on the site. However, we do not know how much weight (if any) to attach to that plan, because EHDC is now preparing a hybrid Local Plan. Rowlands Castle is developing a Neighbourhood Plan, and we have been informed by EHDC that it cannot refer to the Reg 18 plan because it has not been adopted. Similarly, it carries no weight when planning applications are considered.

- The internal layout shown on the Illustrative Master Plan is not accurately drawn to scale and does not show the objects in their accurate proportion, nor does it indicate private gardens. Therefore, it could be very misleading. If (and that is not certain for the reasons given in the first bullet), the plan indicates 100 to 115 dwellings, as referred to in our response to question 8, the housing density would indicate that it is proposed to provide much less Public Open Space than we would have hoped for.
- The Landscape and Visual Assessment report which we were sent on request after the workshop on 1st September 2021 was very informative and contained comprehensive details and photographs of the key views.
- We would agree with the proposed pedestrian access and links, and the proposed primary vehicular access from Prospect Lane.

By ticking this box, you acknowledge that this form will be submitted to East Hampshire District Council on behalf of your parish or town council and used by the planning policy team to inform the emerging Local Plan. The information you have supplied may be shared with the Planning Inspectorate and published only as part of the Council's evidence base for its Local Plan. All comments submitted as part of the consultation will be used in line with our Planning Policy Privacy Notice and kept according to our Retention Schedule, both of which can be found on our website (www.easthants.gov.uk/draft-local-plan)

Appendix A

Dwelling facing Public Open Space as proposed in the schematic



Appendix B

Figure 1 – Dwellings with fronts adjoining access road and facing Public Open Space – Oak Tree Close Rowlands Castle



Figure 2 – dwellings with fronts adjoining access road and facing Public Open Space – junction of Woodlands Avenue and Oak Tree Close, Rowlands Castle. This also shows different road textures



Figure 3 – dwellings with fronts adjoining footpath and facing Public Open Space, Woodlands Avenue, Rowlands Castle.



Figure 4 – grass pavement on one side of road and tarmac pavement on the other side - Oak Tree Close, Rowlands Castle



Figure 5 – brick and flint dwelling



Figure 6 – grass pavement – Oak Tree Close, Rowlands Castle



Figure 7 – Parking bays separated by landscaped strips – Oaklands Avenue, Rowlands Castle



Figure 8 – Courtyard Parking to rear of dwellings, but still overlooked – Woodlands Avenue, Rowlands Castle



Response from Selborne Parish Council (submitted via the consultation platform)

Policy S1 Spatial Strategy - What are your comments on this policy? Managing Future Development

What type and level of development would you like to see in the Parish of Selborne?

A substantial number of respondents mentioned differing types of housing; these being the provision of mainly affordable and some social housing, followed by homes for those wishing to downsize. At the same time more than a fifth of respondents wanted no new houses to be built. Respondents from areas of the Parish closely associated with nearby local housing development eg Bordon/Whitehill expressed a wish for no additional development.

Improved community facilities featured heavily throughout the responses. The community facilities requested for Selborne village included a village store with approximately a quarter of that number wanting it to be a community store. There was support for a pub/hotel with rooms for visitors and better parking facilities. A few suggested the development of the Recreation Ground Pavilion or elsewhere as a community centre. Also better access to health facilities for the whole Parish was mentioned.

Are there areas of the Parish you would like to see developed?

Building on the site of the old Pickers Huts in Selborne topped this section (respondents linked this to the current SDNPA Local Plan where this land has been designated for affordable housing development) with no new houses or new development coming in a close second. A smaller number of respondents suggested the re-development of brownfield sites e.g. the Old Brickworks site in Honey Lane. However more respondents were keen to emphasise how development should be constrained and the need to work within current SDNPA planning policy and other guidance such as the Selborne VDS.

Are there any specific areas you want protected for other uses?

Generally, there was a request for all currently undeveloped land; open land, fields and woodland etc. in the Parish, including the land that backs onto peoples houses, to be protected. Barnfield; the apron of the Hanger; designated Local Green Spaces (Dowlings Little Mead & Church Meadow, Burlands Field/Culvercroft and Selborne Recreation Ground) were all identified as of particular importance as were areas around the periphery of the villages including land owned by the National Trust in Selborne and the area of Shortheath Common in Oakhanger.

Opportunities should be availed to work closely with local landowners in land and farm management in order not only to enhance the natural environment but also to provide direct and indirect employment opportunities. A need to protect local agricultural land is identified to help ensure maintenance of animal grazing and growing crops not only to enhance biodiversity but also to help ensure food security whilst servicing the needs of the population via local shops.

Policy CLIM1 Tackling the Climate Emergency - What are your comments on this policy? - Responding to the Climate Emergency

The 2023 public consultation in Selborne Parish showed support for existing local employers should include the Gilbert White Museum, shops, pubs, Blackmoor Estate, farms, and businesses on small service and industrial estates - particularly but not exclusively at Oakhanger. There should also be support for prospective employers across the Parish. The type of support to include much improved access to fibre broadband, improved electrical infrastructure to support electric vehicle charging and significantly improved mobile telephone signal.

Improvements to local public transport provision to provide better transport options for the Parish and reduce the number of private car journeys.

Improved provision for home working (technical improvements including fibre Broadband and improved mobile phone reception) and the provision of working hubs to reflect changing working practices is seen to be important to enable local business to thrive and to support the local economy.

Policy NBE1 Development in the Countryside - What are your comments on this policy? - Safeguarding our Natural and Built Environment

In the 2023 public consultation in the Parish of Selborne, maintaining and enhancing the special character of the landscape and the unique natural environment has featured heavily. Many respondents commenting on a need for improvement in the state of the footpaths throughout the Parish. They identify a need to ensure the footpaths are well maintained and accessible, not only for our own residents but also for visitors, with potential benefits in supporting tourism and the local economy as well as encouraging healthy lifestyles via exercise generally and walking in particular.

The importance of protecting and encouraging biodiversity, to promote planting trees and wildflower on verges and other spaces, were all common comments. There was support for the Selborne Landscape Partnership, South Downs National Park and the National Trust, as well as seeing what collaborations can be developed with all landowners to help protect and enhance our landscape. Previous comments within the Land Management section reinforce the desire to work with landowners and farmers to ensure that suitable animal grazing and arable land is maintained. This not only enables the important production of food but also supports a rich biodiversity of flora and fauna and maintains the landscape for which the area is famous.

Policy DES1 Well-Designed Places - What are your comments on this policy? - Creating Desirable Places

A high proportion of respondents, including those from outside Selborne village, referred to the Selborne Village Design Statement (VDS) and the areas described in the VDS as meriting protection. The historic buildings of the villages should be protected: the Conservation Area, listed buildings, village halls, public houses, war memorials, churches and churchyards, Selborne High Street and all the lanes leading off it, the Lions Mouth and the Gilbert White Museum and café. All these are important to the Selborne village community. Listed buildings, village hall, public house, church and churchyard also important to residents of Oakhanger.

Other areas were identified and not just on account of built heritage. The Parish has strong links to the natural world and so all its green spaces both in and around the villages plus their surrounds and footpaths should be protected. This includes areas such as Barnfield, the Hanger and its green apron (the open pasture fields that define the Hanger and its relationship with the village), open spaces within the villages and behind houses, the Zig Zag, Selborne Common, the designated Local Green Spaces (Dowlings Little Mead & Church Meadow, Burlands Field/ Culvercroft, and Selborne Recreation Ground), the Plestor, the Lythes, and Shortheath Common.

Valued features of the landscape also to include open streams, tributaries and watercourses.

On drawing up priorities we recognise the statutory purposes of the SDNP and the requirements of legislation as regards the Selborne Conservation Area.

Particular features of buildings of local character

There was a strong suggestion for, where possible, the use of local materials that match the aesthetic of the villages to be used in any new small development so that this can sit happily alongside existing buildings whether of traditional or more recent design in line with the Selborne VDS.

The use of timber, local stone and traditional roofing methods should be encouraged where appropriate. A need for energy efficiency should also be prioritised in any design whilst remaining in keeping the historic nature of the setting.

Any social and affordable housing development could only be achieved if the landscape quality is preserved, and the Selborne VDS guidelines are followed.

Policy DES2 Responding to Local Character - What are your comments on this policy? - Creating Desirable Places

A high proportion of respondents, including those from outside Selborne village, referred to the Selborne Village Design Statement (VDS) and the areas described in the VDS as meriting protection. The historic buildings of the villages should be protected: the Conservation Area, listed buildings, village halls, public houses, war memorials, churches and churchyards, Selborne High Street and all the lanes leading off it, the Lions Mouth and the Gilbert White Museum and café. All these are important to the Selborne village community. Listed buildings, village hall, public house, church and churchyard also important to residents of Oakhanger.

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Any social and affordable housing development could only be achieved if the landscape quality is preserved, and the Selborne VDS guidelines are followed.

Chapter 2 Vision - What are your comments on the Vision? Vision and Objectives

Selborne Parish Council carried out a public consultation exercise in 2023 as part of the work to prepare a Parish Priority Statement for the SDNPA Local Plan Review. This work is also relevant to the EHDC Local Plan review.

The consultation identified three key priorities for the Parish are related to landscape, traffic management, and infrastructure and housing provision.

Protection of the landscape

Maintaining, protecting and enhancing the unique character of the countryside, footpaths and verges featured highly, with achieving greater biodiversity also included. Ideas included planting more trees and wildflower verges. Many respondents mentioned keeping the character of the villages and their environment in line with the Selborne Village Design Statement (VDS) and the Selborne Local Landscape Character Assessment (LLCA).

Reducing the negative impact of traffic on the quality of life and village infrastructure

Traffic through the Parish is by far the most pressing and relentless issue as detailed in the responses from residents who asked for less traffic, lower volumes and so reducing pollution in its many forms. Additionally enforcement of the speed and weight limits across the Parish is seen as a major priority. Ideas put forward ranged from traffic calming measures such as that in Greatham village, speed cameras, a bypass to be built and the Ham Barn roundabout to be changed to divert traffic away from the Parish. People stated not feeling safe walking along the narrow pavements where they exist. Wider and additional pavements were requested to enable all ages and abilities to have safer walking route options.

Improving a number of key aspects of infrastructure and housing provision.

These ranged from the need for local shops/ post offices selling affordable essentials, provision of a pub/hotel with accommodation for tourists and visitors, the need to develop regular and reliable public transport, cycle paths, the provision of free car parking, and the installation of electric charging points for cars and other vehicles. The need to improve communication via the installation of fibre broadband to all homes and local businesses and a desire for improvements in mobile phone reception featured for all villages. It was noted that home working and local businesses all require

good quality communications to enable them to thrive and maintain local employment opportunities.

The need for affordable and social housing was noted, downsizing properties for older residents was also raised so they could stay locally and thus free up their houses for new families wanting to buy in the Parish. Housing should be sustainable, eco-friendly and in line with the Selborne VDS.

Policy DGC1 Infrastructure - What are your comments on this policy? - Delivering Green Connections

In the 2023 Selborne Parish public consultation half of all respondents from across the villages within the Parish identify the need to manage road traffic more effectively; specifically, to reduce traffic speeds, volumes and HGV movements, and to improve local pavements to provide safe walking route options for all ages and abilities. Traffic is seen as being a major contributor of concern to many members of the community. It is identified as having a negative effect of the quality of life, through damage to the fabric of historic houses adjacent to the roads, and to having a negative impact on population health via pollution in its various forms.

Mobile telephone and broadband services are poor across the Parish. There is an identified need for fibre broadband connection to each property to support the introduction of Voice over Internet Protocol (VoIP) and home working together with improvements to mobile telephone reception. This was supported by almost half of all respondents.

The lack of a frequent and reliable bus service, especially but not exclusively at the start and end of the day, mitigates against its use to connect with national train services and wider regional and national public transport systems as well as access to other services including healthcare providers, schools and colleges, and shops at nearby centres. This is seen as resulting in increased use of cars for local journeys and having an unfair consequence for members of the population who, for a variety of reasons, cannot drive the young, the old and the infirm.

The provision of a local shop and post office is specifically mentioned by about half of all respondents. The provision of a pub/hotel in Selborne with rooms for visitors is also supported. Insufficient free local car parking in key locations is seen to work against residents, businesses, and visitors alike and is of significant concern.

Policy DGC5 Provision and Enhancement of Open Space, Sport and Recreation - What are your comments on this policy? - {65a5a244f840d636ccae70c6} - Delivering Green Connections

The 2023 Selborne Parish public consultation found that the Recreation Ground in Selborne was mentioned most, with ideas for improved facilities, such as an outdoor gym, wildlife garden and facilities for a greater range of ages than is currently available.

Many areas were mentioned specifically together with a variety of comments about maintaining or improving accessibility to them, from better maintained footpaths, safer crossing of the B3006 and improved parking, to enable residents from across the Parish to enjoy the beauty of the area. A need for parking in general has been mentioned in many areas of the Parish Priority Statement; there is a need to examine how this can be addressed.

To ensure equality of play opportunity throughout the Parish.

Policy DGC5 Provision and Enhancement of Open Space, Sport and Recreation - What are your comments on this policy? Delivering Green Connections

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To ensure equality of play opportunity throughout the Parish.

Policy H2 Housing Mix and Type - What are your comments on this policy? - Homes for All

What type of homes would residents of the Parish of Selborne like to see in their local community?

â€¢ Considering the presumptive nature of the question that building may take place, the responses say that, if building is to take place, it should be small scale development of affordable (with a small number of social) housing units to meet the needs especially of young families and to support and maintain the school which is seen to be important to Selborne village.

â€¢ Good quality provision for older residents to enable downsizing should also be considered. This would allow them to stay in the Parish where they have existing support structures and would free up larger houses for families.

â€¢ However, a similar number of respondents (compared with the â€˜downsizing group) take the view that there is no need for further provision within the Parish particularly in light of the recent developments at Bordon and Alton. This view varies significantly between the villages with almost three quarters of Oakhanger respondents asking for no further development.

What size of home is needed locally?

â€¢ There is some support for the provision of smaller housing units of mainly 1 to 3 bedrooms is supported. There is no desire for any market housing to be built.

â€¢ Any that are built would be for smaller families, older residents and starter homes for couples and single persons.

â€¢ Provision of elderly care facilities is noted by a small proportion of the population. They ask for this to be provided near to other amenities and public transport links.

Any other requirements?

â€¢ All new build houses to be energy efficient and sustainable using latest and/or best available technology and innovations current at the time of build.

• Owners of existing houses to be encouraged and helped (by grant or otherwise) to improve energy efficiency of their homes.

• Grey water re-use, EV Charge points, better foul and surface water management, flood prevention and the development of local energy source provision are also mentioned as being important by smaller numbers of respondents.

Policy E3 Rural economy - What are your comments on this policy? Supporting the Local Economy

The 2023 public consultation in Selborne Parish showed support for existing local employers should include the Gilbert White Museum, shops, pubs, Blackmoor Estate, farms, and businesses on small service and industrial estates - particularly but not exclusively at Oakhanger. There should also be support for prospective employers across the Parish. The type of support to include much improved access to fibre broadband, improved electrical infrastructure to support electric vehicle charging and significantly improved mobile telephone signal.

Improvements to local public transport provision to provide better transport options for the Parish and reduce the number of private car journeys.

Improved provision for home working (technical improvements including fibre Broadband and improved mobile phone reception) and the provision of working hubs to reflect changing working practices is seen to be important to enable local business to thrive and to support the local economy.

Response from Whitehill Town Council (submitted via the consultation platform)

Chapter 1 Introduction and Background - How do you feel about this chapter? - Introduction and Background

Satisfied

Chapter 2 Vision - How do you feel about the Vision? - Vision and Objectives

Neutral

Chapter 2 Vision - What are your comments on the Vision? - Vision and Objectives

Satisfied with the overall vision such as the number of houses for the Alton area but dissatisfied that the vision is unrealistic for Whitehill and Bordon at present due to the poor public transport links in Whitehill and Bordon. Until the transport system in Whitehill and Bordon is upgraded the vision in the local plan for Whitehill and Bordon is unachievable.

Chapter 2 Objectives - How do you feel about these objectives? Vision and Objectives

Satisfied

Chapter 2 Objectives - What are your comments on the Objectives? - Vision and Objectives

Ideally infrastructure needs to be built at the same time as the housing, not after. An example would be EHDC and Hampshire County Council supporting infrastructure upfront, to be reimbursed by future S106 funding.

Chapter 3 Managing Future Development - How do you feel about this chapter? - Managing Future Development

Satisfied

Policy S1 Spatial Strategy - What are your comments on this policy? - Managing Future Development

Satisfied, however further infrastructure needs built to support the extra dwellings.

Policy S2 Settlement Hierarchy - What are your comments on this policy? - Managing Future Development

Satisfied that Bordon has been placed in Tier 2.

**Chapter 3 Managing Future Development - Please provide any further comments on this chapter -
Managing Future Development**

Employment development is welcome and further work should be done to have commutable locations for business to operate. This helps with employees who cannot drive or make their own way to work.

**Chapter 4 Responding to the Climate Emergency - How do you feel about this chapter? -
Responding to the Climate Emergency**

Dissatisfied

**Policy CLIM1 Tackling the Climate Emergency - What are your comments on this policy? -
Responding to the Climate Emergency**

Further work needs done to meet the targets

**Policy CLIM2 Net-Zero Carbon Development: Operational Emissions - What are your comments on
this policy? - Responding to the Climate Emergency**

Further work needs done to meet the targets

**Policy CLIM3 Net-Zero Carbon Development: Embodied Emissions - What are your comments on
this policy? - Responding to the Climate Emergency**

It does not mention the existing infrastructure and how to improve the amenities.

**Policy CLIM4 Renewable and Low Carbon Energy - What are your comments on this policy? -
Responding to the Climate Emergency**

Further work needs done to meet the targets

**Policy CLIM5 Climate Resilience - What are your comments on this policy? - Responding to the
Climate Emergency**

Further work needs done to meet the targets

**Chapter 4 Responding to the Climate Emergency - Please provide any further comments on this
chapter - Responding to the Climate Emergency**

No further comment

**Chapter 5 Safeguarding our Natural and Built Environment - How do you feel about this chapter? -
Safeguarding our Natural and Built Environment**

Dissatisfied

Policy NBE1 Development in the Countryside - What are your comments on this policy? - Safeguarding our Natural and Built Environment

We feel that this won't work due to the poor transport infrastructure in East Hampshire especially in Whitehill and Bordon.

Policy NBE2 Biodiversity, Geodiversity and Nature Conservation - What are your comments on this policy? - Safeguarding our Natural and Built Environment

Further work needs done on this section and perhaps should be separate to the local plan.

Policy NBE3 Biodiversity Net Gain - What are your comments on this policy? - Safeguarding our Natural and Built Environment

It's not clear whom takes the Legal Responsibility for BNG. Carrying out species and habitat surveys and who is responsible for delivery of the Management Plan and Maintenance Plan either developer, the residents, the local authority or Natural England.

Policy NBE4 Wealden Heaths European SPA and SAC sites - What are your comments on this policy? - Safeguarding our Natural and Built Environment

Agree with this policy.

Policy NBE5 Thames Basin Heaths Special Protection Area - What are your comments on this policy? - Safeguarding our Natural and Built Environment

Agree with this policy however is the funding available?

Policy NBE6 Solent Special Protection Areas - What are your comments on this policy? - Safeguarding our Natural and Built Environment

No comment

Policy NBE7 Managing Flood Risk - What are your comments on this policy? - Safeguarding our Natural and Built Environment

No comment

Policy NBE8 Water Quality, Supply and Efficiency - What are your comments on this policy? - Safeguarding our Natural and Built Environment

Is this happening in the regeneration areas?

Policy NBE9 Water Quality Impact on the Solent International Sites - What are your comments on this policy? - Safeguarding our Natural and Built Environment

No comment

Policy NBE10 Landscape - What are your comments on this policy? Safeguarding our Natural and Built Environment

Agree with this policy.

Policy NBE11 Gaps Between Settlements - What are your comments on this policy? - Safeguarding our Natural and Built Environment

There should be sufficient gaps between settlements as there is already creep between towns and villages in East Hampshire.

Policy NBE12 Green and Blue Infrastructure - What are your comments on this policy? -- Safeguarding our Natural and Built Environment

Agree with Green and Blue Infrastructure policy

Policy NBE13 Protection of Natural Resources - What are your comments on this policy? - Safeguarding our Natural and Built Environment

Agree with this policy.

Policy NBE14 Historic Environment - What are your comments on this policy? - Safeguarding our Natural and Built Environment

Historic and heritage assets should be protected for future generations to enjoy. No developments should build on these sites that hold historic and heritage assets.

Chapter 5 Safeguarding our Natural and Built Environment - Please provide any further comments on this chapter- Safeguarding our Natural and Built Environment

No further comment

Chapter 6 Creating Desirable Places - How do you feel about this chapter? - Creating Desirable Places

Satisfied

Policy DES1 Well-Designed Places - What are your comments on this policy? - Creating Desirable Places

Overall satisfied with the proposals however to make rural locations desirable to live then the public transport infrastructure should be in place. If Bordon had a train station like Alton for example then this would make the town a really desirable place to live.

Policy DES2 Responding to Local Character - What are your comments on this policy? - Creating Desirable Places

Satisfied with this policy, the BOSC development is a good example of character in place with the surroundings.

Policy DES3 Residential Density and Local Character - What are your comments on this policy? - Creating Desirable Places

Satisfied with this policy. Town Centres for example should be higher density to provide footfall for shops and leisure facilities.

Policy DES4 Design Codes - What are your comments on this policy? - Creating Desirable Places

No comment

Chapter 6 Creating Desirable Places - Please provide any further comments on this chapter - Creating Desirable Places

As stated before much work needs to be done on the transport infrastructure in East Hampshire especially in the Whitehill and Bordon area. There seems to be a shift away from car use in the local plan but this is never going to happen without the correct transport in place. A modern reliable transport system will make the new build houses in Whitehill, Bordon and East Hampshire that don't have a good transport system desirable to buy.

Chapter 7 Enabling Communities to Live Well- How do you feel about this chapter? - Enabling Communities to Live Well

Satisfied

Policy HWC1 Enabling Communities to Live Well - What are your comments on this policy? - Enabling Communities to Live Well

Satisfied that a lot of good work is being done to ensure healthier living in East Hampshire. Further incentives to get people active like reduced subscription rates at fitness hubs and leisure centres would be welcome.

Chapter 7 Enabling Communities to Live Well - Please provide any further comments on this chapter - Enabling Communities to Live Well

No further comment

Chapter 8 Delivering Green Connections - How do you feel about this chapter? -- Delivering Green Connections

Dissatisfied

Policy DGC1 Infrastructure - What are your comments on this policy? - Delivering Green Connections

Much more work needs to be done in this regard. Without a reliable clean green public transport system residents of East Hampshire will not be able to reach the infrastructure whether that be places of work, shops and leisure facilities.

Policy DGC2 Sustainable Transport - What are your comments on this policy? - Delivering Green Connections

Much more work needs to be done in this regard. Without a reliable clean green public transport system residents of East Hampshire will not be able to reach the infrastructure whether that be places of work, shops and leisure facilities.

Policy DGC3 New and Improved Community Facilities - What are your comments on this policy? - Delivering Green Connections

Satisfied with the current level of investment in community facilities subject to Whitehill Town Council policy and resolved strategic plan being implemented.

Policy DGC4 Protection of Community Facilities - What are your comments on this policy? - Delivering Green Connections

Satisfied, no further comment.

Chapter 8 Delivering Green Connections - Please provide any further comments on this chapter - Delivering Green Connections

No further comment.

Chapter 9 Homes for All - How do you feel about this chapter? -Homes for All

Satisfied

Policy H1 Housing Strategy - What are your comments on this policy? - Homes for All

We fully support the allocated housing in the Alton area of 1700. The facilities and infrastructure are significantly greater, when compared to Whitehill & Bordon. It is a traditional market town, has a train station, Community Hospital (not proposed to be closed, as with Chase Hospital in Bordon) sixth form college and much larger Leisure Centre

Policy H2 Housing Mix and Type - What are your comments on this policy? - Homes for All

There is a requirement for bungalows and more of these should be built in East Hampshire along with a mix of other houses that are larger to meet demand from large families.

Policy H3 Affordable Housing - What are your comments on this policy? - Homes for All

More affordable housing should be built and the overall percentage of affordable housing on new build sites should be raised, provided that developments are still able to benefit the wider community e.g. S106/developer contributions/wider housing mix as may be desired.

Policy H4 Rural Exception Sites - What are your comments on this policy? - Homes for All

No comment

Policy H5 Specialist Housing - What are your comments on this policy? - Homes for All

Should be enhanced with more specialist retirement facilities and nursing homes required.

Policy H6 Park Home Living - What are your comments on this policy? - Homes for All

There is a requirement in the East Hampshire District for this kind of living and more sites should be created.

Policy H7 Gypsies, Travellers and Travelling Showpeople Accommodation - What are your comments on this policy- Homes for All

No comment

Policy H8 Safeguarding Land for Gypsy, Traveller and Travelling Showpeople Accommodation - What are your comments on this policy? - Homes for All

No comment

Chapter 9 Homes for All - Please provide any further comments on this chapter - Homes for All

No further comment

Chapter 10 Supporting the Local Economy - How do you feel about this chapter? - Supporting the Local Economy

Satisfied

Policy E1 Planning for Economic Development - What are your comments on this policy? - Supporting the Local Economy

Along with attracting business to East Hampshire the relaxation of planning rules, if appropriate for business use is welcome.

Policy E2 Maintaining and Improving Employment Floorspace Across the Plan Area - What are your comments on this policy? - Supporting the Local Economy

More work can be done in this area and incentives should be made to attract companies to East Hampshire to improve employment opportunities

Policy E3 Rural economy - What are your comments on this policy? -Supporting the Local Economy

To make a rural economy work further investment in the transport infrastructure is needed to ensure that workers can get to work.

Policy E4 Tourism - What are your comments on this policy? Supporting the Local Economy

Overall satisfied however to attract tourists a reliable and frequent transport system is required. Some tourist facilities should be made free as this will bring extra money in the rural economy via tourists spending in shops and cafes.

Policy E5 Retail Hierarchy and Town Centres - What are your comments on this policy? - Supporting the Local Economy

Financial incentives should be used to attract retailers to the area. Reduced business rates if appropriate should also be encouraged to attract new shops to open in closed down shops.

Chapter 10 Supporting the Local Economy - Please provide any further comments on this chapter - Supporting the Local Economy

No further comment

**Chapter 11 Development Management Policies - How do you feel about this chapter? -
Development Management Policies**

Satisfied

**Policy DM1 The Local Ecological Network - What are your comments on this policy? --
Development Management Policies**

No comment

**Policy DM2 Trees, Hedgerows and Woodland - What are your comments on this policy? -
Development Management Policies**

No comment

**Policy DM3 Conservation Areas - What are your comments on this policy? -- Development
Management Policies**

Good work already being done with conservation areas and this should be kept going.

**Policy DM4 Listed Buildings - What are your comments on this policy? - Development Management
Policies**

Happy with this policy.

**Policy DM5 Advertisements affecting Heritage Assets - What are your comments on this policy? -
Development Management Policies**

Satisfied

**Policy DM6 Shopfronts affecting Heritage Assets - What are your comments on this policy? -
Development Management Policies**

Satisfied

**Policy DM7 Archaeology and Ancient Monuments - What are your comments on this policy? -
Development Management Policies**

Agree with the policy

Policy DM8 Historic Landscapes, Parks and Gardens - What are your comments on this policy? - Development Management Policies

Agree with the policy

Policy DM9 Enabling Development - What are your comments on this policy? - Development Management Policies

Agree with the policy

Policy DM10 Locally Important and Non-designated Heritage Assets - What are your comments on this policy? - Development Management Policies

Agree with the policy

Policy DM11 Amenity - What are your comments on this policy? Development Management Policies

Infrastructure for new dwellings should be built alongside the development and not after the dwellings have been built.

Policy DM12 Dark Night Skies - What are your comments on this policy? - Development Management Policies

More work can be done in this area especially with regards to education of residents to be sure that dark skies can be enjoyed by all.

Policy DM13 Air Quality - What are your comments on this policy? Development Management Policies

Agree with this policy

Policy DM14 Public Art - What are your comments on this policy? Development Management Policies

No comment

Policy DM15 Communications Infrastructure - What are your comments on this policy? - Development Management Policies

Agree with this policy

Policy DM16 Self-build and Custom Housebuilding - What are your comments on this policy? - Development Management Policies

A policy that should be encouraged as long as it meets the objectives of the local plan.

Policy DM17 Backland Development - What are your comments on this policy? - Development Management Policies

No comment

Policy DM18 Residential Extensions and Annexes - What are your comments on this policy? - Development Management Policies

Planning laws should be reviewed so that residents can extend their homes without extra costs and bureaucracy.

Policy DM19 Conversion of an Existing Agricultural or other Rural Building to Residential Use - What are your comments on this policy? - Development Management Policies

Agree

Policy DM20 Rural Worker Dwellings - What are your comments on this policy? - Development Management Policies

Agree with this policy

Policy DM21 Farm & Forestry Development and Diversification - What are your comments on this policy? - Development Management Policies

Agree with this policy

Policy DM22 Equestrian and Stabling Development - What are your comments on this policy? - Development Management Policies

No comment

Policy DM23 Shopping and Town Centre Uses - What are your comments on this policy? - Development Management Policies

Town Centres across the country are becoming derelict due to online shopping, business rates etc. Financial incentives should be made to shops and businesses to attract them and make the business financially viable.

Policy DM24 Alton Town Centre primary shopping frontage - What are your comments on this policy? - Development Management Policies

No comment

Chapter 11 Development Management Policies - Please provide any further comments on this chapter - Development Management Policies

No further comment.

ALT8a How do you feel about this site? - ALT8 Land at Neatham Manor Farm, Alton

Satisfied

ALT8b What are your comments on this site? ALT8 Land at Neatham Manor Farm, Alton

We fully support the allocated housing in the Alton area of 1700 dwellings. The facilities and infrastructure are significantly greater, when compared to Whitehill & Bordon. It is a traditional market town, has a train station, Community Hospital (not proposed to be closed, as with Chase Hospital in Bordon) sixth form college and much larger Leisure Centre

W&B1a How do you feel about this site? - W&B1 Whitehill & Bordon Town Centre Intensification

Satisfied

W&B1b What are your comments on this site? - W&B1 Whitehill & Bordon Town Centre Intensification

We recognise the frustrating challenge that East Hampshire District Council in that it cannot include the part of the district that falls within the South Down National Park within its local plan. This includes Petersfield. This leaves Alton and Whitehill & Bordon as the only two 'towns' in the Local Plan.

We recognise that home housing increases create extra economic activity, creating jobs locally and supporting local businesses. Development can generate S106 that can be invested into the local area. We would not want to see the development and regeneration of the new Town Centre area stagnate.

We also recognise that the Planning Inspectorate is unlikely to sign off a plan that would propose housing for the Alton area, Four Marks, Southern Parishes and other villages, without including Whitehill & Bordon.

This plan proposes 667 homes to be delivered by 2040 (noting this in addition to the 2400 homes given planning permission of which about 1900 have yet to be built and any 'windfall site' e.g. a random planning application approved.)

In contrast, the Alton area is now proposed to take 1700 extra homes - just over two-and-a-half times as many as Whitehill & Bordon. We feel this is justified, based on their level of facilities and infrastructure. We also note 1073 proposed to go elsewhere in the district.

Therefore, Whitehill & Bordon is proposed to take 667 out of the 3440 total, which is 19.4%. We feel this is a fair number when looked at in this overall context and support the local plan allocations across the district.

We are concerned that any increase in housing may stretch vital facilities and infrastructure must match growth. We support the 'requirements' outlined, but express concern that the Health Hub proposed for Whitehill and Bordon is not yet 100% confirmed and thus need to ensure there is adequate medical provision if the Health Hub does not get built with the Local Plan acknowledging this. We would like to see a requirement supporting public transport e.g. via S106, as this is crucial for our community, especially where we have no train station.

W&B2a How do you feel about this site? - W&B2 Land at the Former Bordon Garrison

Satisfied

W&B2b What are your comments on this site? - W&B2 Land at the Former Bordon Garrison

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W&B3a How do you feel about this site? - W&B3 BOSC Residential Expansion

Satisfied

W&B3b What are your comments on this site? - W&B3 BOSC Residential Expansion

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W&B4a How do you feel about this site? -W&B4 Louisburg Residential Extension

Satisfied

W&B4b What are your comments on this site? - W&B4 Louisburg Residential Extension

We recognise the frustrating challenge that East Hampshire District Council in that it cannot include the part of the district that falls within the South Down National Park within its local plan. This includes Petersfield. This leaves Alton and Whitehill & Bordon as the only two 'towns' in the Local Plan.

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W&B5a How do you feel about this site? -W&B5 North of Louisburg Employment Proposal

Satisfied

W&B5b What are your comments on this site? - W&B5 North of Louisburg Employment Proposal

We recognise the frustrating challenge that East Hampshire District Council in that it cannot include the part of the district that falls within the South Down National Park within its local plan. This includes Petersfield. This leaves Alton and Whitehill & Bordon as the only two 'towns' in the Local Plan.

We recognise that home housing increases create extra economic activity, creating jobs locally and supporting local businesses. Development can generate S106 that can be invested into the local area. We would not want to see the development and regeneration of the new Town Centre area stagnate.

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W&B8a How do you feel about this site? - W&B8 Land at the Forest Centre, Whitehill & Bordon

Satisfied

OF1 Is there anything else you would like to tell us about this consultation? - Other Feedback or Comments

We understand that the new Whitehill and Bordon Town Centre development is happening in its current location because that is where the MOD land became available. However, having a shopping area in the original Town Centre area of Bordon is extremely important in serving residents in this part of town. We also support regenerating the Forest Centre offering and ensuring shops remain open in that part of Bordon.

We are also concerned with the amount of information that residents are expected to read to format a meaningful response to the local plan consultation.

Local plan response

[REDACTED]
Sat 02/03/2024 11:50

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

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

Wield Parish Council supports the SBP proposals in the latest version of the EHDC Local Plan for Upper Wield, in particular noting its categorisation as "tier 5".

[REDACTED]
Clerk
Wield Parish Council

Worldham Parish Council Response (submitted via the consultation platform)

Chapter 3 Managing Future Development - How do you feel about this chapter?

Neutral

Policy S1 Spatial Strategy - What are your comments on this policy?

There's a real need for the South Downs National Park Authority (SDNPA) to play a more significant role in providing housing. We need greater advocacy for an increased allocation of housing development within the South Downs National Park area in order to meet the target of delivering at least 9,082 new homes. At the same time we would like to emphasize the importance of sustainable and well-planned development to preserve the natural and cultural heritage of the region. We would stress that this needs to be done so by involving the park and the local residents, businesses, and other stakeholders to gather input, address concerns, and ensure that new developments align with the community's values and needs.

Policy S2 Settlement Hierarchy - What are your comments on this policy?

The area in Worldham outside the SDNPA boundary should be treated as countryside and not in tiers 1 - 5.

To note that Alton is in Tier 1. However Neatham Down is in Binsted and not Alton and therefore should be classified as rural countryside also. Therefore all policies specific to rural development, conservation, and sustainability should be taken into account when considering this site, and not Tier 1 policies.

Policy NBE1 Development in the Countryside - What are your comments on this policy?

Agree

Policy NBE10 Landscape - What are your comments on this policy?

Agree

Policy NBE11 Gaps Between Settlements - What are your comments on this policy?

Agree

Policy DES2 Responding to Local Character - What are your comments on this policy?

Agree

Policy DES3 Residential Density and Local Character - What are your comments on this policy?

Agree

Policy DGC1 Infrastructure - What are your comments on this policy?

Agree

Policy DGC2 Sustainable Transport - What are your comments on this policy?

Agree

Policy H1 Housing Strategy - What are your comments on this policy?

Agree

Policy H2 Housing Mix and Type - What are your comments on this policy?

Agree

Policy H4 Rural Exception Sites - What are your comments on this policy?

Agree

Policy H7 Gypsies, Travellers and Travelling Showpeople Accommodation - What are your comments on this policy?

Agree

Policy E3 Rural economy - What are your comments on this policy?

Agree

Policy DM2 Trees, Hedgerows and Woodland - What are your comments on this policy?

Agree

Policy DM3 Conservation Areas - What are your comments on this policy?

Agree

Policy DM8 Historic Landscapes, Parks and Gardens - What are your comments on this policy?

Agree

Policy DM12 Dark Night Skies - What are your comments on this policy?

Agree

Policy DM18 Residential Extensions and Annexes - What are your comments on this policy?

Agree

Policy DM19 Conversion of an Existing Agricultural or other Rural Building to Residential Use - What are your comments on this policy?

Agree

ALT6b What are your comments on this site? - ALT6 Land at Wilsom Road, Alton

We believe that this site should be rejected as it is a floodplain and unsuitable for such a large development.

ALT8b What are your comments on this site? - ALT8 Land at Neatham Manor Farm, Alton

Neatham Down stands as an untouched expanse of remarkable natural beauty, offering expansive views adjacent to the South Downs National Park (SDNP). The Campaign to Protect Rural England (CPRE) recognizes Neatham Down as of high value and a valued landscape. East Hampshire District Council's (EHDC) Large Development Landscape Value Statements from July 2020, viewed the landscape at Neatham Down as medium/high value, echoing the significance of the surrounding SDNP. Any development poses a threat to this landscape, jeopardizing its views, tranquility, and wildlife. As one of the six hills enveloping Alton, its undeveloped skyline is a crucial aspect of the town's landscape, as well as the skyline to the park. It is considered from the plans that the development would be visible over the bowl-like topography.

The Local Plan seems to have identified Neatham Down as Tier 1 Alton, however the site exists in Binsted and therefore should be regulated against policies specific to rural development and not Tier 1 policies. However its integration with the surrounding areas of Alton is a key concern, as noted in the same document, with the A31 acting as a barrier. The physical and psychological separation from Alton and the parish of Binsted raises concerns about community interaction. The absence of planned infrastructure for the first "6-10 years" into the development emphasizes the risk of Neatham Down becoming an isolated estate. This would be further compounded on the roads leading into Alton and despite development of foot and cycle lanes and the proposed electric bus route these are unlikely to have the proposed effect of dramatically reducing private car travel in the area.

The overdevelopment of Alton and oversubscribed services are additional factors against the proposed development. Alton's existing strain on services like education and primary care, coupled with the delayed establishment of a school at Neatham Down and the potential traffic increase, underscores the impracticality of the development. Moreover, an outdated employment assessment from 2013 and 2018, recommending office space allocation at Neatham Down, raises questions about the current relevance of these reports post-Covid. The evolving landscape of work may render the suggested office spaces unnecessary

Worldham Parish Council would also like to raise concerns about groundwater flooding as highlighted in the East Hampshire District Local Plan Development Regulation 18 Consultation (September 2019), which assigns a RED Groundwater Flood Risk to Neatham Down. Approximately 44% of the site is at risk, and the potential exacerbation of groundwater flooding due to climate change further compounds the issue.

Considering these issues Michael Gove's recent stance on allowing authorities to allocate less land for development if it threatens the character of an area or involves building on greenbelt land could be a pertinent argument against developing Neatham Down.

W&B8a How do you feel about this site? - W&B8 Land at the Forest Centre, Whitehill & Bordon

Satisfied

W&B8b What are your comments on this site? - W&B8 Land at the Forest Centre, Whitehill & Bordon

Will it be demolished before renovation? Thanks