

**Responses from Organisations and Interest Groups**  
**East Hampshire Draft Local Plan 2021-2040 Reg18, 2024**

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## ACAN Response to Consultation on East Hampshire Draft Local Plan 2024

### Introduction and General Comments

Alton Climate Action Network (ACAN) generally welcomes the Plan, in clearly setting out a general direction and a set of underlying policies which could be a valuable tool in helping to limit and mitigate the effects of the climate and biodiversity crises.

We have provided detailed comments on individual aspects of the Plan below, but begin with a number of important overarching comments, as follows:

- In a number of places in the Plan e.g. Vision, there is reference to the “climate crisis”. Except where there is a specific climate-only issue, it is important to refer instead to the “climate and biodiversity crises”.
- In many instances the Objectives and Policies are quite vague. Wherever possible terms should be defined and targets set that are specific, time-bound and quantifiable. It should also be clear who will monitor performance, who is accountable and who will provide the necessary management resources for the long-term.
- In many cases, although the headline Policy appears strong, there are then sub-policies, which subsequently significantly weaken the main policy by allowing extensive exceptions. We would urge all exceptions to be kept to an absolute minimum. The exceptions are often dependent on proposed developments being otherwise “unviable” or instances where “the benefits outweigh the harm”; we see these exceptions as unacceptably broad and vague, potentially rendering large parts of the policy ineffective and would urge you to very tightly define these exceptional circumstances. Similarly, we would also urge EHDC to make it clear that these Policies apply to all development, not just those above a minimum scale.
- Issues relating to sustainable transport occur at many points in the Plan. Being on the Eastern edge of the District, with a main rail connection to London, Alton finds itself in many ways better connected to areas outside of East Hampshire than to the rest of the District. We would like to see more recognition throughout the Plan of the importance of connections within the area to improve the sense of community.
- There are several references in the Plan which recognise the importance of the connection of people to the natural world e.g. to enhancing and improving habitats, and to improving access to open spaces, etc. We would like to see explicit policies somewhere in the Plan that require expansion of publicly accessible natural green spaces, at least proportionately to the forecast increases in population.

- It is proposed that ecological reports are required in various circumstances regarding development approval processes. We would seek assurance that the quality of such reports is precisely defined i.e. that they are independent, up-to-date, accurate, science-based and comprehensive.
- We understand that many of the proposed standards for climate mitigation and biodiversity requirements are nationally set, but we would urge the Council to go further wherever local discretion is permitted.

## Comments on Specific Objectives and Policies

### Objective A

- we agree with the local authority's aim to support the sustainable provision of homes and the local economy. We would therefore argue that the word "growth" is unnecessary and should be deleted from Objective A1 and the word "growth" replaced by "activity" in Objective A2 and the headline title of Objective A.
- It should be recognised that many local people travel in/out of the area to work, therefore the provision of sustainable transport options for those travelling in/out of the District needs to be addressed, perhaps as an Objective A2 b).

### Responding to the Climate Emergency

Policies CLIM1,2,3 & 4 are being responded to separately by Energy Alton, a constituent group of ACAN and their comments will not be repeated here.

### Safeguarding our Natural and Built Environment

**NBE1** – we would argue that there are far too many allowances of acceptable development in the countryside e.g. extensions, recreation. In addition, there should be explicit policies to ensure that **all** such developments fully mitigate any adverse climate change and biodiversity impact. We also have some concerns about the encouragement of "suitably previously developed land" mentioned in paragraph 5.12 and would suggest that the wording in para 5.13 is amended from "it may be necessary for supporting evidence to be submitted..." to "it will be necessary...".

**NBE 2.2** – the exceptions policy is too loose.

**NBE3** – we would question how accurate and consistent NBG measures are, so that within the expected error range, a net gain may actually be a net loss. Also, the Policy is unclear on how the long-term management plans will be monitored by the Council, financed and enforced. Paragraph 5.24 cites exemptions, most of which are unjustifiable and undermine the principle of achieving a BNG outcome which should at least be encouraged in all development proposals, whatever their scale.

**NBE7** – we would argue that there should be an explicit presumption against building in flood risk zones.

### Enabling Communities to Live Well

[www.altonclimatenetwork.org.uk](http://www.altonclimatenetwork.org.uk)

**HW1.1c** – We would suggest adding reference to access to natural green spaces with high quality habitat and biodiversity. The term “blue corridor” needs to be explained – should there be policies attached to these?

### **Homes for All**

**H4** – the criteria for approving rural exceptions sites are very loose. Market housing should not be permissible on such sites. In addition, there should be explicit reference to the need for these developments to be climate sustainable and biodiversity positive.

### **Supporting the Local Economy**

**E1.1c** – this exception is very wide and includes no reference to sustainability.

**E3.1** – we would argue that the reference to having regard to the “impact on the environment” is too weak. Instead, we would look for a requirement for such developments to improve the environment.

**E4.1** – the criteria for approval seem weak. There does not seem to be any reason why failed tourism businesses should be allowed to be redeveloped; indeed, this could be used as a loophole to get permission for developments that might have been unacceptable if originally proposed for the site.

**E5.3** – we welcome the “town centre first” policy, but would question whether it has been implemented – many recent developments on the outskirts of Alton have been to the detriment of the town centre’s vitality.

### **Development Management Policies**

**DM 1.1** – the provision that development that damages the local ecology will be approved if the “benefits outweigh the harm” is extremely weak and totally undefined, so that this Policy could be completely ineffective. It needs significant strengthening.

**DM2.1 and 2.2** are very welcome. We would urge you to emphasise within the Policy the particular importance of retaining native trees, plants and hedgerows. In many developments, inconvenient established native hedges are ripped out during development and later replaced by non-native species such as Leylandii and Laurel.

**DM19 c** – the conditions in this Policy are so weak as to undermine the Policy e.g. the requirement for a local housing need would probably apply across the whole District.

**DM20.2** – this provision substantially undermines the Policy.

**DM21.d** – this exception i.e. due to “operational circumstances” risks undermining the whole Policy.

END

## Alton East Hampshire District Councillors - Letter on the Proposed draft housing allocation

Boxall, Ginny <Ginny.Boxall@easthants.gov.uk>

Sun 03/03/2024 08:39

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

Dear Residents and East Hampshire District Council Leadership ,

We, the Alton East Hampshire District Councillors, collectively voice our concern regarding the current housing allocation for Alton, which we believe to be disproportionately high compared to other areas within our district.

While we understand the necessity for housing development to meet growing demands, the current allocation for Alton places an undue burden on our community.

We believe in the importance of fair and equitable distribution of housing across the district, ensuring that the impact is shared more evenly.

Alton is an historic market town with sites of important ecology and biodiversity and is a vibrant and unique part of our district. We are committed to preserving its character and maintaining a sustainable balance between growth and the preservation of our local environment. We believe that a reduction in the housing numbers allocated to Alton will better align with the needs and capacities of our community.

Our goal is not to hinder progress, but rather to ensure that development is thoughtful, balanced, and considerate of the local environment. We invite constructive dialogue and collaboration with residents, stakeholders, and fellow councillors to find a solution that benefits both the district as a whole and our treasured town of Alton.

Together, let us work towards a future where housing development respects the distinctiveness of each community within our district, producing a sustainable living environment for all.

Sincerely,

Cllr Ginny Boxall

Cllr Suzie Burns

Cllr Graham Hill

Cllr Steve Hunt

Cllr Warren Moore

Cllr Emily Young

**Cllr Ginny Boxall**

**Whitedown Ward , Alton**

**East Hampshire Liberal Democrat**

**Your details may be stored for casework purposes**

## **Response to EHDC Local Plan, Alton Ramblers Group, Feb 2024.**

Overall, we remain neutral as a body to the plan details, but we do have specific comments relating to footpaths provisions, as follows:

1. We find the overall almost total absence of mention of PRoWs in the policies as drafted as disconcerting, given that lifestyle, health and overall sense of place come from the ability to get out and do exercise, walk the dog, family time, etc. DES section could be revised to include this. Much more emphasis on footpath connections in new Allocated sites (including “alleyway” links) to paths passing the edge of a site, all should be included when and if these sites get approved and built.
2. We of course expect all Allocated sites to maintain footpaths and bridleways before, during and after construction as required by law. But this does not get mentioned in the NBE or other policies.
3. Landscaping and access to and near ProWs is also essential, and again, no mention of the policy to respect the proximity of a site to preserve access and landscaping this and other natural amenities.
4. We comment on specific Allocate Sites in our Group area as follows:

Land at Brick Kiln Lane, ALT1:in ‘Access’ section, the potential for public rights of way network to be connected is mentioned. We believe good access to Brick Kiln Lane on the eastern edge is essential, allowing link to path 10 and 19 connecting to the path network north of Alton. A suitable crossing point on the A339 (if it can be made safe on that high-speed road) to link to path 714 and to the Whitedown Lane ALT 4 site would also be vital to “connect” the site to the rest of Alton. It is otherwise right on the Western edge and somewhat isolated.

Land at Whitedown Lane, ALT4: ‘Access’ section mentions a possible access and improvements (a new connection) to Rights of Way. Specifically path 714 and 712 could link to the site giving good access to Ackender Wood, and Beech village. Link paths form the housing areas to the ProWs will of course be part of this requirement. All paths need to be maintained for access at all times.

Land at Mounters Lane (Travis Perkins) ALT5: Access to the footpath up Mounter’s Lane is essential here, to link the new houses to Chawton Park Road for Sports centre, 64 and 38 buses etc. However the historic Mounters Lane (path 502 and 506) has a grotty surface for pushchairs etc, and the top section is narrow. All need to be improved as part of this development (CIL funding?).

Land at Wilsom Road ALT6: the site borders footpath 40 and 26 (Hangers Way) and the path access and quality should be respected. We do note however that the A31 road crossing is not very safe for groups, families or inexperienced walkers to use, due to the traffic speeds and visibility (road curves). It is frequently overgrown as it reaches the sides of the A31. A better proposal would be to add a pavement or path on the western edge of the site by the bus stop to allow walkers on Wilsom Road to walk south, cross at the bus stop area, and to then walk under the A31 bridge (if space can be made available on the northern side) on Wilsom Road and then turn north onto the proposed new footpath Worldham 504 alongside the A31 joining footpath 26 (subject to a DMMO process at present).

Land at Lynch Hill, ALT 7, 'Access' section mentions a potential to have a connection between Waterbrook Road and Golden Chair Farm over the A31 via the currently near-private bridge. We would very much support this specific initiative to convert the farm access track to a proper pedestrian and cycleway (shared) to allow a safe, more direct route to the Neatham Down site (ALT8) and to access the land and paths south of Alton generally. The additional safe crossing would greatly help families and walkers to get out into the countryside and encourage a better quality of life for residents in central Alton to get out, and the Neatham Down site residents to get into town. We believe this should be the prime consideration of the layout for the Lynch hill industrial area proposed. We note previous Planning Applications for the site with similar proposals, these do provide what we are looking for.

Land at Neatham Manor Farm ALT8: 'Access' section mentions a potential to improve access across the A31 either via the bridge off Waterbrook Road or another construction to go over A31. As for our comments on Lynch Hill above, we support this. We also commend the planned layout to be sympathetic to the footpath 1 across the site. However, the width of the "corridor" needs to be considered carefully. If the width of the tract of "green" is too narrow it will grow together and form an unpleasant tight green corridor, and overgrow the required width of path within a few years. We would suggest trees that grow upwards, more than outwards, and to allow adequate width for these trees to become mature and still give a nice width to the path (per HCC requirements). And for the trees to allow some views to the side and the sky to avoid the corridor effect. If the path is to be altered in status to Bridleway or restricted BOAT (no motors), consideration of the surface, extra width to allow users to share will be needed. A full BOAT would not be appropriate.

Link paths to footpath 1 from the housing areas would be part of the scheme. More attention to this (no. 1) footpath's exact route within the site and linking paths to housing areas need to be carefully designed to give a short route to the main PRow, path 1. Footpath 1 also needs to have made new safer crossing points (e.g. dropped kerbs, road markings, visible to motorists approaching the roundabout) over the newly expanded A31 roundabout needs to be considered also- the current crossings at the roundabout are very dangerous, and the path is rarely used as a result. The scheme employed at Chawton roundabout/Northfield Lane would be sufficient. A link to the pavement on Montecchio way on the north east side of the A31, would be useful to join up a route to Mill Lane and Holybourne/Eggar's school. This all needs to be rectified to make the footpath 1 a popular route that de facto is used and gives people true benefit to offset the harm a large site like Neatham Down would have.

We also note the quite apparently sympathetic retention of green infrastructure around the edges of the site, to protect the rural scene along the Hangers Way (paths 020/26/1, 020/70/1, 259/31/1, 259/31/2,259/32/3, 259/33/1, 020/3/1 and 002/703/1) and other paths in the region to the south, including the SDNP boundary only 1500 m away.

\*\*\*\*\*

Contact:

██████████ Walking Environment Officer, Alton Ramblers Group  
██████████

## East Hampshire District Council Draft Local Plan Consultation

Dear Sirs

We refer to the response to consultation submitted to you on the 29<sup>th</sup> February 2024 by Bramshott and Liphook Parish Council. Their response incorporated a discussion paper provided to that Council's Planning Committee by the Bramshott and Liphook Neighbourhood Plan Steering Group.

Following concerns raised by some local residents, the Steering Group felt that it was important to provide you with some context and clarification.

The paper concerned was based on a broad analysis of the Draft Local Plan against the provisions of the emerging draft Neighbourhood Plan and was intended to stimulate discussion and options to enable the Planning Committee to formulate a response to the Local Plan consultation.

The Steering Group would wish to simply clarify that they were not promoting any of the particular allocated sites within the Plan or seeking to increase the number of homes allocated within the parish. We remain concerned to ensure that sites are as sustainable as possible and meet the housing needs of local people in accordance with the provisions of the East Hampshire Local Plan and the Neighbourhood Development Plan.

Yours faithfully

Bramshott and Liphook Neighbourhood Plan Steering Group



## Plans for Deerleap, Rowlands Castle

[REDACTED]  
Fri 23/02/2024 19:57

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

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

Dear Sir,

With reference to the local plans, I see that two developments are planned for Deerleap, Rowlands Castle.

Should these developments go ahead, I suggest that it would be essential to carry out a full archaeological survey once the ground is cleared. The reasons for this are:

- The developments are very close to the scheduled monument of the Motte
- The Bailey of the Motte probably extends into the development zones
- There may well be other features associated in that area, such as Roman buildings and a Roman road
- There was a thriving Roman pottery industry in that area
- Pottery found locally is also dated back to pre-Roman and there may well be Iron Age dwellings in that area
- There is a possibility that the Bailey, which is shaped like a playing card, originated in the Roman period.

I do not believe that a search of HER records would be sufficient as this ground has never been properly investigated before.

Yours faithfully,

[REDACTED]  
Chichester & District Archaeology Society

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]



The countryside charity  
Hampshire



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

Working locally and nationally for  
a beautiful and living countryside.

Planning Policy  
East Hampshire District Council

4 March 2024

**Response of CPRE Hampshire, the Countryside Charity, to Regulation 18 Part 2 Consultation on East Hampshire Local Plan 2021-2040 (excluding the South Downs National Park (SDNP))**

CPRE Hampshire, the Countryside Charity, welcomes the opportunity to contribute to this consultation, which we do by way of this letter as the on line response is not suitable for the detail of our Response. This Response is the outcome of discussion amongst the members of our East Hampshire District Planning Group.

Overall we consider the Draft Plan to be a good plan and, on the whole well-written. We appreciate that a number of points made by us in response to the Regulation 18(1) consultation have been taken on board. Our **support** can be recorded for the plan as a whole other than as set out in the following text. Some policies have our **strong support**, as indicated in the following text.

However, there are significant areas of contention as highlighted below:

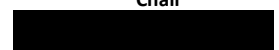
- the proposed housing numbers are unnecessarily high, totalling no less than 4764 homes additional to local need due to application of buffers, necessitating a large new settlement allocation within a Valued Landscape at Neatham Down
- there needs to be more requirement in specific policies for provision of smaller and more affordable homes and social rented accommodation
- no specific protection for Valued Landscapes is provided
- protection for tranquillity is needed
- greater protection of the natural environment from large scale solar farms is needed.

Supporting arguments are to be found in the text below

President



Chair



Registered charity number 1164410

A particular **concern** with the Draft Plan is that in relation to several policies there are important principles stated in the supporting paragraphs but not included in the wording of the Policy itself. While it may be said that supporting paragraphs may be referred to when deciding applications, our experience is that Inspectors on Appeal (pressed accordingly by Applicants) are inclined to take account only of the wording of the Policy itself. We consider it vital that all principles are included within the wording of the Policy. We point these occasions out where relevant to our comments.

## **02. VISION AND OBJECTIVES**

The current Local Plan recognises and protects the high quality landscape and natural environment of the local plan area, as does this consultation plan within Safeguarding the Natural Environment. This vital objective should be made clear in the 2040 Vision and in our view the reference to "green and welcoming places to live, work and play" does not achieve this. Nor is there any reference to the need for development to be sustainably located.

In response to the 18(1) consultation, we suggested the addition of the words underlined "*..... with green and welcoming places to live, work and play and respond positively to the climate emergency within an environment in which natural beauty and wildlife is protected and new development is sustainably located*".

We maintain that view, but do recognise that the Vision is now amplified by the Objectives, including Objective B1 relating to the built and natural environment which we agree.

As regards housing matters we support the ambition expressed in the Vision and the Objectives. We particularly welcome the phrase 'quality affordable homes' that is included in the Vision. We suggest that this point is also made explicitly in the Objectives.

## **03. MANAGING FUTURE DEVELOPMENT**

### **Policy S1 - Spatial Strategy**

#### **Some Support with Strong Concerns**

We support the building of the 7125 new homes to meet the local need, recognising that there are young people moving out of the district because they cannot find the appropriate accommodation.

We recognises that the Standard Method also requires use of an Affordability Ratio in the final calculation of the minimum target for housing in the District. However, we have long held major concerns about the use of the Affordability Ratio. This algorithm adds a buffer of 3855 homes (54%) to the minimum target for the District.

We have previously challenged the requirement for this buffer on the grounds that

- There is no evidence that it delivers against its stated purpose ie to make homes more affordable.
- Basing the Affordability Ratio in East Hampshire on the 'work-place based earnings' distorts the conclusions. As the DLP states: "*As a rural district there are no large employment centres which benefit from critical mass*". It is therefore reasonable to conclude that the majority of the adults who move into the 3855 new homes will be working outside the district. It would, therefore, be much more appropriate to base the Affordability Ratio on the 'residence based earnings'.

From this inflated figure of 10,982 new home it is proposed that 83% should be allocated to the 43% of the land area that falls outside the national park. CPRE Hampshire, along with a number of other well-informed parties, consider that this proportion is too high. We are not in a position to recommend a precise figure for the appropriate percentage, but note that this is a significant further buffer to the numbers within the Local Plan Area.

However, in determining the most appropriate percentage it is noted that all of the additional 3855 calculated using the Affordability Ratio algorithm for the total district, have been allocated to the Local Plan Area. It is clearly not appropriate for this reduced area to be expected to absorb 100% of this additional figure.

Further, in the context of the discussion about the appropriate allocation between the national park and the Local Plan Area, there is an assumption made that the SDNPA will reduce further the quantum of new houses. This was previously set at 114 pa; this has now been reduced to 100 pa. We have not seen any evidence to justify this yet further buffer.

Finally, on top of number of houses that would be required to be built for those migrating into East Hampshire; and on top of the fact that 83% of that inflated number has to be squeezed into 43% of the land area; there is added a further buffer of 643 houses. In **paragraph 9.21** it is stated: *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.*

No evidence is provided to justify this, or any, scale of 'unmet needs from South Hampshire', and we consider this large buffer of 643 homes cannot be justified, especially having regard to the reducing population in the PFSH as shown by the 2021 census, and the recent clarification by the Secretary of State that cities with a 35% housing uplift, which includes Southampton, will need to meet this requirement within city limits and not expand into the countryside. These factors should eliminate, or at least much reduce, any unmet need from PFSH.

Cumulatively, therefore the following buffers are proposed over and above the 7125 new homes to meet the local need;

- 3855 due to the chosen Affordability Ratio, all of which are allocated to the Local Plan Area covering 43% of the District
- 266 due to reduction to allowance to the national park being reduced to 100pa, and
- 643 to meet potential unmet need from PfSH

totalling no less than 4764 additional homes due to application of buffers. We therefore consider that it is justified within the parameters imposed through the NPPF to significantly reduce the number of new homes over the Plan Period.

The greater number would matter less if this number of additional homes could be developed without the need for a large new settlement within undeveloped countryside, but it appears this is not the case. We revert to that when considering the proposed allocation at Neatham Down below.

We support the spatial strategy as summarised in **Policy S1.3** *“To help achieve sustainable growth the Local Planning Authority will ensure development is distributed in accordance with the spatial strategy shown on the Key Diagram, in line with the settlement hierarchy (Policy S2), with a greater proportion of development in the larger and more sustainable settlements (as identified in Chapter 12).”*

In a predominantly rural district, it is most sensible to concentrate the greater proportion of development in the larger and more sustainable settlements. Most of the rural settlements in the district will remain car dependent for the foreseeable future, and so it would not be sustainable for major development to be placed there. This is well reflected in Policy **DGC2.1** which has our strong support.

It is stated in para 3.37 that focusing growth on the larger settlements has the potential to make best use of previously developed land. While this is correct we do not see in **Policy S1 or S2** a commitment to a "brownfield first" policy; and we consider that more work could be done to utilise brownfield sites instead of greenfield allocations to settlements, which will in so many cases be outside a "20 minute Neighbourhood" and will tend to be car dependent, which will increase transport emissions contrary to climate change policies. The sites appearing on the Brownfield Land Register are very dependent on landowners or others putting them forward and not on a proactive search. We have for some time advocated the Council carrying out an Urban Opportunities Study, to identify further sites within the urban area that could be made available for housing. And we note that no use has been made of the Part 2 of the Brownfield Land Register.

## **Policy S2 - Settlement Hierarchy**

### **Support with some Concerns**

We support the fact that EHDC have provided a revised evidence base to underpin the structure of the settlement hierarchy. The new methodology is clearly more analytical, although some aspects remain a little opaque.

We have concerns about

- The application of the concept of the '20 minute Neighbourhood'. During the period of the Plan, CPREH do not believe that this concept is going to be able to be applied in any practical way outside the larger and more sustainable settlements.
- The fact that the conclusions of the tiering that were arrived at based on the empirical analysis for the Settlement Hierarchy have been adjusted based on consideration of the scale of the population. This is clearly in conflict with the concept of the 20 min Neighbourhood. If the current population has grown in such a way that many of the new developments are outside the 20 min orbit, then it is not logical to add new developments that are even further away from the facilities.

We are unclear why Alton has become the only Tier 1 settlement, and Whitehill/Bordon is now Tier 2 when a new town centre and other facilities are being developed.

We have comments below as to the place of Pound Holt within the Settlement Hierarchy.

## **04. RESPONDING TO THE CLIMATE EMERGENCY**

### **Policy CLIM1 - Tackling the Climate Emergency**

**Strong Support subject to Concerns**The Plan states that one of the key challenges for the District is the Climate Change emergency. We fully agree.

We strongly support all new homes to be "zero carbon" and that new development prioritises the achievement of net-zero carbon emissions.

We support enabling people to live locally and reduce reliance on the car. As is made clear in Fig 4.2, the most significant source of CO<sub>2</sub> 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 Fig 10.1 demonstrates, in 2011 44% of those in employment commuted to work outside the District

As discussed in relation to Policy S1, the Plan envisage a significant number of new homes beyond those to meet local need, which will encourage people to migrate into the plan area, often retaining jobs outside the plan area. Without the provision of employment or investment in public transport this will significantly increase the amount of pollution created

by commuter traffic. This clearly undermines many of the other very positive climate change policies. It would be more consistent with the policy of addressing the Climate Change Emergency if there was a clear policy to enable those migrating into the District to be able to find employment within the District.

But what is needed is specific reference to protection and enhancement of countryside and an acknowledgement of its role in both achieving net zero, through the sequestration of carbon through intelligent land use, and the ability to mitigate impact (for example slowing or containing flooding).

The requirement that new development should prioritise the achievement of net-zero carbon emissions, emphasises the need for solar generation to be on rooftops and not greenfield sites. This is discussed further in relation to **CLIM4**.

### **Policy CLIM2 - Net-Zero Carbon Development: Operational Emissions**

#### **Strongly Support with Recommendations**

We support the intention that commercial development (500m<sup>2</sup> or more) should achieve a 100% regulated carbon emissions reduction but **CLIM2.3e** should make clear that rooftop solar will (by logic) be a standard requirement for all new build.

**CLIM2.5** has our strong support in encouraging the retrofitting of measures to improve the energy efficiency of existing buildings. This needs to include rooftop solar, to reduce the requirement for greenfield sites

### **Policy CLIM3 - Net-Zero Carbon Development: Embodied Emissions**

#### **Strongly Support**

### **Policy CLIM4 - Renewable and Low Carbon Energy**

#### **Strong Concerns**

Objective B1, Policy NBE10 and Para 5.5 make it clear that a key objective for the LPA is to continue to maintain and improve (conserve and enhance) the quality of the natural environment of the Local Plan Area, including our high quality valued landscapes. Para 5.72 states that the special qualities of the Area's valued landscapes must be respected, and Para 5.75 states new development should be designed and located to protect and enhance valued and high quality landscapes.

While CPRE generally supports the principle of renewable energy, including solar energy. we consider that solar energy arrays should be located on brownfield sites, and on the roofs of large industrial or agricultural buildings, rather than on land in use for agriculture; but where a countryside location is deemed essential, an acceptable scale and location within the landscape is vital if the proposal is to be acceptable. The overall plan needs to be landscape led. Large scale solar farms will rarely be acceptable within a "valued" or highly sensitive landscape. Cumulative impact with other solar farms must be considered. The best

and most versatile agricultural land (Grade 3a and above) should not be used for solar panels.

Also, greenfield solar may be beneficial for landowners and developers but there are significant costs to the community in terms of potential loss of heritage, landscape, amenity and tranquillity. Indeed, it is clear from recent experience that large solar farms are currently the greatest threat to landscape value, landscape character and visual amenity in the countryside. There is also a loss in terms of the potential for land to mitigate climate change through natural sequestration, and productive land at a time when the aim is to reduce dependency on imported food. Further technology that may rapidly become redundant risks causing damage to the District's countryside for a short term gain.

So, it is not appropriate to sacrifice large tracts of the countryside to solar farms, especially valued and valuable landscape.

Accordingly we consider Policy **CLIM4** is too quick to support a significant expansion of renewable energy schemes, which will include greenfield solar generation. It is important for the LPA to hold in balance its important role in protecting and enhancing the countryside, as a resource for all Residents, an asset for visitors and tourism, a vital part of the history and heritage of the District and as a key part of maximising carbon sequestration.

We understand that **CLIM4.2** is intended to cover proposals for wind and solar developments inside potentially suitable areas, as identified in the Renewable and Low Carbon Study (2018). This needs to be made clear because, as drafted it provides support for all solar based energy proposals wherever situated and without even regard to the requirements of CLIM4.1. In any event, "potentially suitable areas" is not defined. It would be clearer if an amended CLIM4.2 preceded CLIM 4.1 as suggested below.

It follows that **CLIM4.1** must be intended to apply to proposals outside "potentially suitable areas" as identified in the Renewable and Low Carbon Study (2018). Certainly, NPPF requires Local Plans to provide a "positive framework" for renewable energy development but surely that does not mandate a *presumption in favour of permission* in areas not considered to be "potentially suitable areas". The usual test of lack of significant impacts should be applied.

In order to align with other policies in the Plan, landscape value needs to be expressly referred to in paragraph (a), in addition to landscape character, and a requirement for *no significant impacts* is much clearer and less subjective than use of the word *acceptable*

As to **CLIM4.3**, this needs additionally to give support for rooftop, car park and brownfield solar proposals, but in all cases permission needs to be compliant with other policies in the Plan, such as are designed to safeguard the natural and built environment. Otherwise this Policy appears to provide support for any development that can be said to contribute to net zero irrespective of its adverse impact, which we do not believe can have been intended.



Owing to their industrial nature, we do not consider battery storage facilities to be suitable for greenfield in all but exceptional circumstances. They should be treated as industrial infrastructure inappropriate for a rural location. In any event there need to be policies to protect tranquillity as battery storage facilities can be a significant source of noise.

Accordingly, we suggest that **CLIM4** is redrafted as follows:

CLIM4.1 *The Local Planning Authority will support schemes for wind-based and solar-based energy proposals when they are located in potentially suitable areas identified in the Renewable and Low Carbon Study (2018). Site specific assessments and design will still be required.*

CLIM4.2(a) *In all other cases, proposals for renewable energy schemes, including ancillary development, will be permitted where there are no significant adverse impacts, direct, indirect, individual, or cumulative, having considered the scale, siting and design, and consequent impacts on landscape value and landscape character; visual amenity; relative tranquillity; dark night skies; biodiversity; geodiversity; food security; flood risk; townscape; heritage assets, their settings and the historic landscape including impact on the South Downs National Park and the Surrey Hills Area of Outstanding Natural Beauty; and highway safety and rail safety; and*  
(b) *aeronautical and other military considerations have been satisfactorily addressed; and*  
(c) *the are no significant adverse impacts on the amenity of sensitive neighbouring uses (including local residents) by virtue of matters such as noise, dust, odour, shadow flicker, air quality and traffic.*

CLIM4.3 *Where planning permission is needed, the Local Planning Authority will support proposals which are necessary for, or form part of, the transition to a net zero carbon East Hampshire, subject to compliance with other policies in this Plan. This could include rooftop, car park and brownfield solar development; proposals for energy generating technologies to meet the requirements of Policy CLIM2; energy storage facilities (such as battery storage or thermal storage); and upgraded or new electricity facilities (such as transmission facilities, sub-stations or other electricity infrastructure)*

CPRE Hampshire considers such amendments necessary to render the Plan "sound" and in the event that **Policy CLIM4** remains without appropriate amendment in the Regulation 19 version of the Local Plan we would feel it necessary to make a Representation accordingly for consideration by the Inspector at the Local Plan Examination.

## **Policy CLIM5 - Climate Resilience**

### **Strongly Support**

## **05. SAFEGUARDING OUR NATURAL AND BUILT ENVIRONMENT**

### **Policy NBE1 - Development in the Countryside**

#### **Strong Concerns**

This policy needs to state, as a fundamental requirement, that development will only be permitted where it can be demonstrated that a countryside location is both necessary and justified. This is an essential requirement of Policy CP19 of the current Joint Core Strategy ("genuine and proven need for a countryside location"), and all previous local plans. We cannot see any reason for leaving out this long established requirement, which would inevitably result in more development in the countryside.

This requirement is stated in **para 5.11**, but not in the wording of Policy, without which it may be left out of account by Case Officers or Inspectors on Appeal.

### **Policies NBE2 to NBE6**

#### **Neutral**

These policies relates to matters of biodiversity in which CPRE Hampshire has only limited expertise. We leave response to these policies to others with greater knowledge.

### **Water Environment**

#### **Support with Recommendation**

We welcome the recognition that the water environment is hugely important as a natural resource and plays an important part in shaping our landscape, but a more holistic view is needed than appears in the following policies. The Policies should cover aquifers, and river health, using a catchment approach

### **NBE7 - Managing Flood Risk**

#### **Support with Recommendation and some Concern**

Our comments above regarding a more holistic approach apply to this Policy.

We welcome the emphasis in **NBE7.3** on the use of SuDS, and the recognition in **NBE7.4** that SuDS play an important role in positively addressing climate resilience and assisting developments to reduce their carbon footprints; and that any 'natural' SuDS features should manage flood risk but should also seek to improve water quality, increase biodiversity and provide amenity benefits, such as additional public open space. However, we consider this policy would should state, additionally:

*Long term plans with designated agents for the permanent maintenance and management of attenuation ponds and other installed SuDs features should be decided from the outset. SuDS should be used to provide multiple functions and benefits to landscape quality, recreation and biodiversity. This can be achieved through habitat creation, new open spaces and good design.*

Groundwater flood areas are essential as space for water to go. Developing them will lead to flooding downstream. Contrary to **NBE7.5** such sites should be avoided completely. As it stands this policy is not sustainable as resilience cannot be guaranteed into the future in light of climate changes affecting water over the lifetime of the development.

## **NBE8 - Water Quality, Supply and Efficiency**

### **Strong Support with Recommendation**

Para 5.61 and NBE8.1 emphasise the link between planning and water quality, and the need for measures to protect water quality to be implemented in advance of construction, which we welcome and we strongly support the requirement in NBE8.4 for all residential development for new dwellings will to demonstrate a water efficiency standard of no more than 95 litres per person per day, subject to viability, but the Policy needs to state additionally in this context that high priority should be given to the installation of grey water systems, rain water storage and recycling systems

## **NBE9 - Water Quality Impact on Solent International Sites**

### **Support with Recommendation**

It is crucial that mitigation measures for development be within the same water catchment as the development, as stated in para 5.69, but we consider this should be stated within the Policy to read:

*NBE9.1 Development that results in a net gain in residential units and/or overnight accommodation will be permitted (subject to other material considerations) where the applicant can demonstrate through a nutrient budget and Habitats Regulations Assessment that the proposal is either nutrient neutral or has approved on-site and/or off-site mitigation measures within the same water catchment which result in the proposal becoming nutrient neutral.*

Commercial development may also be a source of nitrate and phosphate pollution, and we consider should be added to the Policy.

## **Policy NBE10 - Landscape**

### **Strong Support with some strong Concerns**

As stated above, it is clear from recent experience that large solar farms are currently the greatest threat to landscape value, landscape character and visual amenity in the countryside, and so to the natural environment. Accordingly our concerns relating to **Policy CLIM 4** re very relevant to this policy on landscape.

Objective B1, Policy NBE10 and Para 5.5 make it clear that a key objective for the LPA is to continue to maintain and improve the quality of the natural environment of the Local Plan Area, including our high quality valued landscapes. This has the strong support of CPRE Hampshire.

**NBE10.1** refers to *conserving and enhancing the special characteristics, value, features and visual amenity of the Area's landscapes*. We strongly support this policy, but would add sense of place following *value*, as appears in Policy CP19 of the Joint Core Strategy.

**NBE10.1** refers to *value* of the landscape, Para 5.72 states that the special qualities of the Area's *valued landscapes* must be respected, and Para 5.75 states new development should

be designed and located to protect and enhance *valued and high quality landscapes*. Yet, there is no specific policy to protect valued landscapes. We consider this to be an important omission.

We note, by way of example, that Policy 5 in the Proposed Submission Version of the Hampshire Minerals and Waste Plan provides:

*3. Minerals and waste development which is considered to be within a valued landscape shall only be permitted where they meet the above criteria, and where it protects and where possible, enhances the landscape with particular regard to:*

- i. The intrinsic landscape character and quality;*
- ii. The visual setting (including key views);*
- iii. The landscape's role in natural capital and ecological networks;*
- iv. The local character and setting of built development (including historical significance);*  
*and*
- v. Natural landscape features (including ancient woodland, trees, hedgerows, and water courses etc).*

And the Basingstoke and Dean Local Plan consultation version provides:

*Landscapes of particularly high value outside of the National Landscape are identified as Valued Landscapes on the Policies Map. Development proposals will only be permitted in these areas where they protect and enhance features that contribute to the character, quality and interpretation of these landscapes*

And, where Areas of Special Landscape Quality are stated to be valued landscapes, the adopted Fareham Local Plan provides;

*Areas of Special Landscape Quality have been identified in the Borough and are shown on the Policies map. Development proposals shall only be permitted in these areas where the landscape will be protected and enhanced*

It is clear, therefore that a policy for protection of valued landscapes, as needed to comply with NPPF paragraph 180(a), is becoming well established in up to date local plans. In the event that no such policy is included in the Regulation 19 version of the Local Plan we would feel it necessary to make a Representation accordingly for consideration by the Inspector at the Local Plan Examination.

**NBE10.2** fleshes out NBE10.1 and again has our strong support. However, tranquillity and dark night skies are an important aspect of landscape and experience of the landscape within the Local Plan Area as well as the national park. As regards dark night skies, this is expressly recognised in Policy NBE13.1(a), Policy DM12 and para 5.96. While these important features may be identified within the emerging Landscape Character Assessment, we consider it crucial that they are covered within a local plan policy, and that after sub paragraph (c) should be added:

*(..) tranquillity and dark night skies*

Again, views are a crucial aspect of visual amenity and scenic quality of landscape and we consider should be given some protection by amending sub paragraph (b) as follows:

*(b) The visual amenity and scenic quality of the landscape (including key views)*

Sub paragraph (d) sets out to protect the setting of the national park and has our strong support in complying with NPPF para 176.

### **NBE11 - Gaps Between Settlements**

#### **Support with strong Concern**

CPRE Hampshire has long supported a policy of protecting from development the open land between settlements in order to maintain their identity and prevent coalescence.

Paragraph 5.81 states that *the precise boundaries for the gaps have been identified and form part of the Local Plan*. We understand this to mean that all land outside settlement policy boundaries falls within the Policy, and that accordingly there is no need for specific settlement gaps as per Policy CP23 of the Joint Core Strategy. On that basis we support the Policy, albeit anxious that the gaps listed in CP23 would no longer be expressly referred to in the Local Plan and the opportunity that might give to developers.

A close in settlement policy boundary has been shown to provide protection against backland development on the edge of the settlement, and so protect settlement gaps. So, a strong concern is the way new settlement policy boundaries have been drawn, notably at those settlements which have not had settlement policy boundaries in the past. These have been drawn widely, and this will allow backland development within Policy DM17.1, which risks undermining gaps between settlement and the identity and character of the settlement.

### **NBE12 - Green and Blue Infrastructure**

#### **Strong Support with Concern**

While the aims of this policy are strongly supported, we consider it needs more attention to blue infrastructure both on and below ground, and recommend the following additional criteria:

*NBE12g it maintains the quantity and quality of surface water on, near to or downstream from, any planned development and preserves and enhances its natural biodiversity. Marginal and aquatic habitats should be protected in their natural state not landscaped.*

*NBE12h it protects the quality and quantity of water below ground as ground water or as aquifer from infiltration of any kind which would alter the water quality.*

*NBE12i Any attenuation ponds in development SUD systems are permanent, properly maintained and planted with native species, as per NBE7.4.*

### **NBE13 - Protection of Natural Resources**

#### **Strong Support with Recommendation**

Due to the importance of water as a whole as natural resource within the Local Plan Area, we consider **NBE13.1(c)** should refer to all water resources, not just groundwater resources, to read

c. Do not result in a reduction in the quality or quantity of water resources: this includes.....

As regards **NBE13.1(d)**, we consider it would be helpful to Case Officers if a summary of the objectives of relevant River Basin Management Plans were to be included as an additional supporting paragraph

#### **NBE14 - Historic Environment**

##### **Strong Support**

It is important, as required by NBE 14.2(b), that all of the criteria apply in every case.

While the inset on page 133 defines Historic Environment, which is helpful, we have not found any reference to the historic environment in the Policy wording and wonder if it has been omitted.

### **06. CREATING DESIRABLE PLACES**

#### **Support with concerns and recommendations**

The design chapter of the Plan is impressively set out with smart graphics, but overall we consider the chapter is unnecessarily complex and long as the majority of planning applications submitted to the District are of a minor nature, 'Householder' applications for extensions to or renovations of homes, or proposals for small housing developments. Advice for those applicants needs to be straightforward and accessible. The guidance in this Chapter, which includes Master-planning, seems to be aimed at large scale developers who in any event will be supported by a team of professional advisors, well versed in Master Planning. Most applicants do not fall into this category.

Other Planning Authorities have adopted a simpler approach. The South Downs National Park Local Plan has a relatively straightforward Design Policy DS5 and a specific policy for house extensions at Policy SD31. That Policy is short, informative, and easy to follow. More recently Basingstoke and Deane Borough Council is promoting a simpler draft in its Local Plan.

#### **DES1 - Well- Designed Places**

##### **Support with concerns and recommendation**

According to paragraph 6.7, this Policy is the overarching policy designed to establish a design vision and criteria that directly relate to the 'ten characteristics of well-designed places' from the [National Design Guide \(Jan 2021\)](#), which is a reasonable approach. However, the only explanation of the 10 characteristics is found in Figure 6.1 (copied from the National Guidance) and they are not easy to read.

In fact, the ten characteristics are: context, identity, built form, movement, nature, public spaces, uses, homes and buildings, resources, and lifespan. Paragraph 6.7 states that **Policy DES1** provides an interpretation of these 10 characteristics that are contextually relevant to

the Local Plan Area and that it should be considered alongside national guidance. However, in our view the Policy provides no logical relationship between the National guidance, the local plan policies and the particular, and diverse, characteristics of the plan area. It would be useful if a list of the characteristics was to be set out and then utilised to create a logical narrative of how each characteristic is relevant in the design of development in the plan area.

Regarding the design vision, **DES1.1** states that *new development will be permitted where it would help to achieve the following design vision*, it then has a list of criteria, but the design vision needs to set out at the start what a 'beautiful East Hampshire' will look like by the end of the Plan Period, and this is not provided. The criteria included tend to be generic design jargon which will provide limited aid to most users of the local plan as to what might be acceptable development in the district.

## **DES2 - Responding to Local Character**

### **Support**

We note that **DES3** 'Residential Density and Local Character' covers much of the same material, repeating many of the points in this Policy.

## **DES3 - Residential Density and Local Character**

### **Support with Concern**

This policy states that *new development within settlement policy boundaries and on allocated sites must optimise density of new residential uses through making an efficient use of land*. We support this principle, which accords with Chapter 11 of NPPF, and will save countryside. So, the need to increase densities and make better use of land should be encouraged, but the density requirement set out **DES3.1(a)** does not appear to implement the principle and we consider is likely to perpetuate current densities even where a higher density would not be inappropriate.

## **DES4 - Design Codes**

### **Support with Concerns**

We support the need for a Design Code for the Local Pan Area, but we find this Policy difficult to comprehend. **DES4.3** states *any visual and numerical design requirements that are established by design codes that have been approved by the LPA must be met through the design and layout of related new development. Such requirements must be clearly identified within a design code*. We do not understand what this means.

Paragraph 6.45 says that following community engagement a design code will be prepared alongside the Local Plan and this process will commence in 2024. This may help understanding of this process, but paragraph 6.46 states inter alia *the characteristics of well-designed spaces that are to be the focus of binding requirements should not relate to the appearance of buildings, but should be those relating to the "deep structure" of a place- e.g. the three dimensional pattern or arrangement of development blocks, streets, buildings and*

*open spaces, the way people and vehicles move around..... etc.* We do not understand how this helps someone who is trying to submit a planning application.

We consider that this Policy should sets out a formal time frame for implementation of the Design Code. Failure to do this would in our view render the Plan unsound

## **0.7 ENABLING COMMUNITIES TO LIVE WELL**

### **HWC1 - Health and Wellbeing of Communities**

#### **Support with Recommendations**

We consider that **HWC1(b)** should include a reference to mobility scooters and wheelchairs

It is unclear what type of mitigation measures are envisaged should developers be unable to demonstrate health benefits of a proposed development since neither the policy itself nor the supporting text make mention of what these might be. This needs to be clarified.

**Table 7.1** quotes Policy HWC1 whereas the indicator refers to the content of policy HWC2. We do question the veracity of the indicator since policy HWC2 requires developers to submit a HIA for all applications of more than 50 homes. The indicator would therefore be no more than a count of the number of such development proposal submitted. A better indicator would be the number submitted that provide evidence of positive health impacts of the development.

In the **para 7.7** the policy number referred to should be HWC2.

## **08 DELIVERING GREEN CONNECTIONS**

### **Support**

## **09. HOMES FOR ALL**

### **Policy H1 - Housing Strategy**

#### **Strong Concern**

See our comments on Policy S1 regarding excess numbers of new homes. We do not consider there is a necessity for a strategic allocation of 1000 new homes.

### **Policy H2 - Housing Mix and Type**

#### **Support with Recommendations**

We support the observation made in **H2.1** about the need for smaller homes to be built in the District. By smaller homes, we understand that this would be 1-2 bedroom homes which would meet the two critical needs highlighted by the HEDNA – the provision of homes for

- Young couples who are trying to get onto the housing ladder
- Older citizens who are hoping to 'down-size'.



However, we consider that Plan significantly understates the scale of the challenge that the District faces in addressing these policy requirements. The scale of the challenge can be seen from

- i) The HEDNA. Table 6.10 shows that more than 100% of the growth in population will come from the 65+ age group.
- ii) Affordability. With the Affordability Ratio of 54% there is clearly an affordability crisis.

The evidence base suggests that there is a need for more robust policies to support 'smaller housing'.

We recommend that a policy statement as to the minimum percentage of smaller homes that would be required on any development of more than 5 houses. Based on the evidence provided by the HEDNA, we recommend that this figure should be at least 75%.

### **Policy H3 - Affordable Housing**

#### **Support with Concerns and Recommendations**

It is made clear that there is a significant need for affordable housing in East Hampshire, but we consider that the proposal is not robust enough to meet the identified need.

The 'need' for affordable housing over the Plan period is assessed to be 11,647 homes. ie more than 100% of the total housing requirement. Yet, to address this need **H3.1** requires only 40% of all the planned development is supplied as 'affordable homes, ' stating *'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 policy relates to the definition of 'Affordable Housing' included in the glossary of the NPPF ie *" housing for sale or rent, for those whose needs are not met by the market".*

Generally such affordable housing is provided as housing for rent. However, we consider it to be important that in an area of high cost housing, such as East Hampshire, the building industry should also be encouraged to build market houses that people can afford, for which there is a strong need. We recommend that this is defined as *'houses that are put on the market at a price that is below the median house price for the District'.*

This highlights the fact that there are two different concepts when considering affordability

- houses for those whose needs are not met by the market.
- market houses that are affordable ie 'houses that are put on the market at a price that is below the median house price for the District'

So, to meet the challenge of the affordability crisis, CPREH recommend that within **H3.1**

- the 40% requirement for 'affordable homes' is increased, and
- a robust is added policy to ensure that a significant percentage of the market homes are put on the market at a price below the median house price for the District.

The Policy also refers to social housing, which we support, but are concerned that the challenge of need for social housing identified in the HEDNA will not be met by the requirement set out in **H3.1(ii)**

#### **Policy H4 - Rural Exception Sites**

##### **Support with Recommendations**

We consider the Policy should be strengthened in two areas.

- 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
- 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 Living**

##### **Support**

#### **Policy H6 - H8 - Mobile Home Parks, Gypsy and Traveller Accommodation**

##### **Neutral**

### **10. SUPPORTING THE LOCAL ECONOMY**

These Policies are **supported**, subject to our comments in relation to CLIM1 as regards need for local employment to reduce emissions generated by commuting in cars.

### **11. DEVELOPMENT MANAGEMENT POLICIES**

#### **Strong Support**

These policies are vital to achieving sympathetic development within the Plan area and have our strong support, notably the Dark Night Skies Policy - which is new we believe.

However, we observe that the number of policies is much reduced from those in the Saved Policies of the East Hampshire Local Plan. The principles contained in those omitted will, we trust, have been incorporated into the main Plan policies but we do not have the resources to check that before the end of the consultation period.

## **12. SITE ALLOCATIONS**

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

#### **Very Strong Concern**

While we appreciate this Site is located close to the Settlement Hierarchy Tier 1 town of Alton, and in this sense has the appearance of a being a sustainable location, the fact is that it would be separated from Alton by the busy A31 and Lynch Hill. This is confirmed in the Landscape Value Statements of the Large Development Sites of July 2020 by Terra Firma, which states as regards the then proposed Neatham Down Site (which forms part of the proposed allocation):

*The site is offset from the existing edge of settlement by the A31 and Lynch Hill beyond, although part of Lynch Hill is within the 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.*

The existing bridging over the A31 would be suitable only for walking and cycling from a limited part of this very large site. The route leads into an industrial estate quite some distance from the facilities of the town centre, and this would not be an attractive route into town. Otherwise all access would need to be onto the A31 roundabout which, without a new bridge, is difficult and dangerous to cross on foot. The reality is that most access would likely be by car onto the A31, which is specifically designed to bypass Alton, providing no incentive to use the facilities in Alton, indeed rather the opposite.

For these reasons it would be very difficult to integrate development on this site with the facilities offered in Alton. Further the site is much larger than the Large Development Site consulted on earlier in the process of developing this Plan, and for 80% more homes. Accordingly, in our view this allocation as proposed would in fact be a new settlement, largely unconnected to Alton.

This fact, and the reality of a high degree of car use by perhaps 2500 residents contrary to climate change objectives, means that this site is not in a *sustainable location*, contrary to the terms of the proposed Vision. Nor is it in the *right location*, as envisaged in Objective A1.

As such it would bring housing development over the A31 away from Alton for the first time, contrary to the longstanding policy of the Council to confine development in this area to the landscape bowl in which the town of Alton sits. Once the A31 barrier is breached the whole tract of countryside between the A31 and the national park could become available for development.

We submitted in response to the Large Development Sites consultation that this Neatham Down area is a Valued Landscape, and this was confirmed in the Terra Firma Report which, as well as drawing attention (as stated above) to its *rural and undeveloped character and its strong relationship with and connection to the wider landscape to the east*, provides;

*There is no intervisibility with the SDNP, but the attractive landscape is fairly representative of the first special quality of the SDNP; diverse inspirational landscapes and breath-taking views.*

While there may have been no intervisibility with the national park for the considerably smaller Large Development Site under consideration in the Report, we believe any development on the eastern slopes of Golden Chair Hill would have intervisibility with the national park, and so be within its setting.

Further the Report identifies key aspects of value associated with the site as;

- *The locally distinct 'bowled' topography of the site and its immediate setting*
- *Positive characteristics of the wider LCA:*
  - 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 sites strong relationship and continuity with the countryside to the east*

and concludes that

*Within the context of this study, no aspect of the site has a high value, but several factors contribute to this site being out of the ordinary, with a medium/high value.*

This assessment refers to the much smaller site proposed in the Large Development Sites consultation, which it confirms has demonstrable attributes beyond the ordinary and is a Valued Landscape.

Yet, the site now proposed includes Neatham Down, Golden Chair Hill and Copt Hill. High points which, with the original proposed Large Development site, form part of a tract of landscape which is of the highest quality within the Plan Area, and undoubtedly a Valued Landscape. The character of this landscape would be lost; along with 98 hectares of good agricultural land, currently producing food and absorbing CO2 emissions

This fine undeveloped landscape is clearly visible over the A31 from the high ground on the other side of the valley, including Brockham Hill and Holybourne Down, from which Alton and Holybourne in the valley are hardly visible. Development would compromise these fine long distance views over the proposed site towards the national park. *Is this correct?* Also the experiential and aesthetic qualities of journeying towards the national park through this valued landscape using the public rights of way leading from Alton and Holybourne would be compromised by the built development. Clearly, there would be serious adverse impact on Dark Night Skies and tranquillity of the area.

For these reasons, it falls within an area of low landscape capacity for housing development as assessed in the East Hampshire Landscape Capacity Study.

The value, high quality and visibility of the landscape means that its development would be entirely contrary to Objective B1 *to make sure that new developments are located to maintain and improve the quality of.....natural environments, including our high quality and valued .....landscapes*, and contrary to NPPF policy Para 170 which states that: *planning policies and decisions should contribute to and enhance the natural and local environment by: a) protecting and enhancing valued landscapes.....*

All of which only adds strongly to the conclusion that site is simply not in the *right* location, and its development for large scale housing would be highly detrimental to the much valued natural environment of the Plan Area.

As is made clear in the consultation paper, sites are only being *proposed* in this Draft Local Plan and the Council wishes to hear the views of residents. As set out above CPRE Hampshire's view is that this proposed allocation is not in the *right* location,

- being a new settlement not in a sustainable location
- would generate significant extra transport emissions
- is within a landscape of the high value, quality and visibility, a Valued Landscape
- is partly within the setting of the national park,
- would have serious adverse impact on dark night skies and tranquillity, and
- is in an area assessed as of low landscape capacity for housing development

And should be **withdrawn**

While we accept that being a Valued Landscape does not prevent all development, the presumption is firmly against large scale development, which can only be justified if absolutely necessary. For the reasons stated in relation to **Policy S1**, we consider the housing numbers being proposed are excessive and that a significant reduction in number is justified within the parameters imposed through the NPPF. Further, so far as the allocation includes the whole or part of the buffer of 643 homes to meet possible unmet need in South Hampshire we do not see how a large allocation in the north of the District would be capable of meeting that need.

Accordingly we consider a large development site near Alton of the size proposed in a valued landscape is unnecessary and unjustified, and withdrawal of the proposed allocation is necessary to render the Plan "sound" and in the event that the it remains in the Regulation 19 version of the Local Plan we would feel it necessary to make a Representation accordingly for consideration by the Inspector at the Local Plan Examination.

## **HOP1 – Land west of Fullers Road, Holt Pound**

### **Concern**

Holt Pound has been re-assessed as a Tier 3 Settlement, but is essentially a small hamlet and *hardly a focal point for the surrounding villages and rural areas in terms of the provision of local services and facilities* so as to justify becoming a Tier 3 Settlement. We consider it should return to Tier 4 and, as such, the allocation of the site west of Fullers Road would not be justified.

Further, we note that in 2018 the Council 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 follows that proposed form of development would be at odds with the setting, form and semi-rural character of Holt Pound.

For these reasons, we consider this proposed allocation should be **withdrawn**

*CPRE Hampshire South Downs & Central Planning Group*

**From:** [REDACTED]  
**Sent:** 08 March 2024 14:33  
**To:** [EHDC - Local Plan](#)  
**Subject:** local plan consultation comments  
**Attachments:** [EHCP local Plan - Energise South Downs comments\(final\).docx](#)

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

Dear East Hants Local Plan

Apologies for yet another update to my comments to the local plan. Here is my final version,

Many thanks

[REDACTED]  
[REDACTED]  
Project Director



[ESD.ENERGY](#) - Powering the Energy Transition in the South Downs and Surrounding Areas  
Energise South Downs Ltd. Community Benefit Society Registered with the FCA Number 8880.

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## **Energise South Downs response to the consultation on East Hants draft Local Plan 2021-2040, Regulation 18**

<https://www.easthants.gov.uk/planning-services/planning-policy/local-plan/draft-local-plan-2021-2040>

This document lists the consultation comments submitted by Energise South Down on 8<sup>th</sup> March.

Overall, we feel that this is a very good plan and we support it. We welcome the opportunity to respond to the consultation and have proposed some suggestions on the subject of community energy and renewable energy in the relevant sections.

### **04: Responding to the climate emergency**

#### **CLIM1 Tackling the climate emergency**

Energise South Downs supports the policy with suggestions for the following additions:-

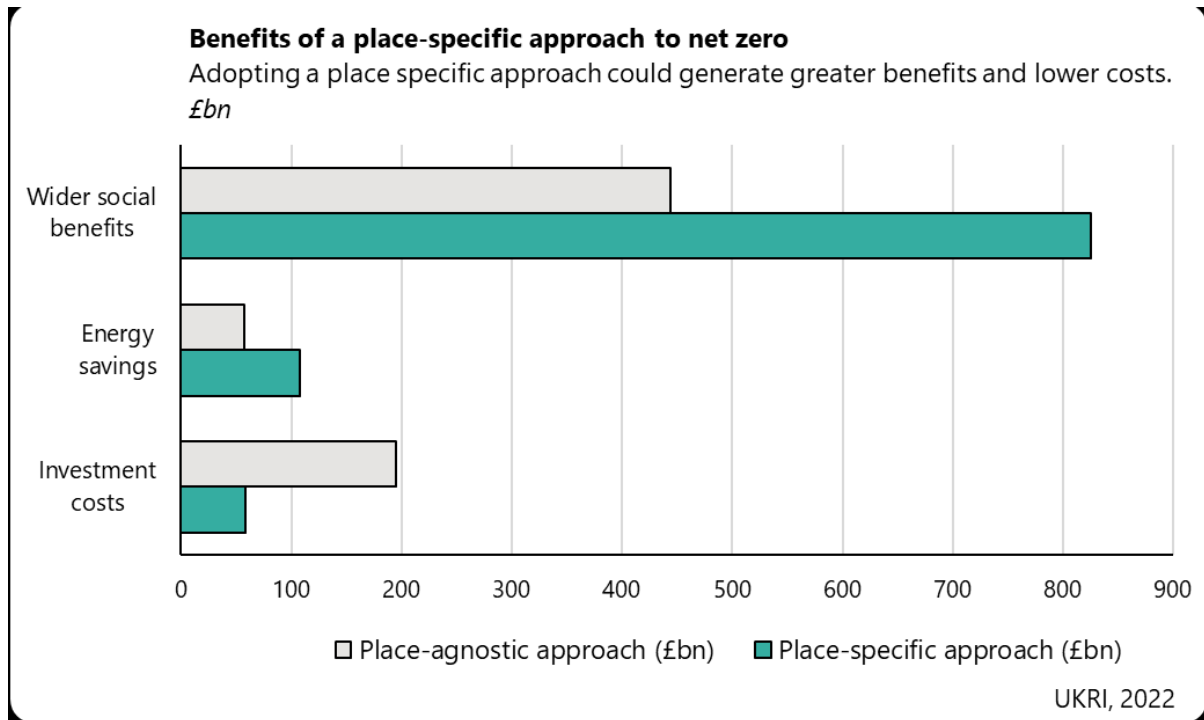
#### **IMPLEMENTING THE POLICY**

- ‘By driving action from a community level upwards, local authorities can make sure that it is tailored to local situations, responsive to local needs, makes the most of local opportunities, and is more popular and impactful as a result’ (Mission Net Zero – Independent Review Skidmore 2023 pg 185)
- ‘Recognising **this more locally-led, place-based approach to net zero delivery will not just deliver a better tailored, more supported transition, but it can also deliver greater economic and social benefits**’. UKRI's *Accelerating Net Zero Delivery* report found that “a place-specific approach delivers more benefit for less cost”.<sup>521</sup> (Mission Net Zero – Independent Review Skidmore 2023 pg 186)

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**Benefits of a place-specific approach to net zero<sup>522</sup>**

- ‘The opportunity for better economic returns is largely because the costs and benefits of the transition to net zero will vary by place. For example, cities with poor air quality may see greater health benefits from investing in active transport solutions. Rural areas may need a greater focus on retrofitting older, less dense housing where residents could see greater savings on their energy bills. A locally-led approach is better placed to identify such challenges and opportunities’ (Mission Net Zero – Independent Review Skidmore 2023 pg186)

**CLIM4 Renewable and Low Carbon Technology**

**Energise South Downs supports the policy with suggestions for the following additions:-**

Community Energy to be mentioned in the main policy

**CLIM 4.4**

The Local Planning Authority will support community energy in delivering renewable energy projects that are at least partly owned, led and/or controlled directly by communities. Community energy projects not only contribute to net zero but are a distilled example of [ESD.ENERGY](#) - Powering the Energy Transition in the South Downs and Surrounding Areas



energy security and sovereignty, with many communities moving towards a goal of energy self-sufficiency. (Mission Zero - Independent Review of Net Zero Skidmore pg 213)

Community energy projects involve groups of people coming together to purchase, manage, generate, or reduce consumption of energy. This includes (but is not limited to), solar panels, wind farms, hydro power, rural heat networks, electric vehicle charging points, car clubs and fuel poverty alleviation schemes. Programmes are usually not-for-profit, and profits raised from projects are reinvested back into the communities which they power. Government recognises the role community groups play in our efforts to eliminate our contribution to climate change and offers a range of support to community energy projects.

(<https://www.gov.uk/government/publications/local-net-zero-support-for-local-authorities-and-communities/local-net-zero-central-support-for-local-authorities-and-communities>)

## IMPLEMENTING THE POLICY

- A well-managed solar farm can become a nature reserve for its operational lifetime, resulting in huge benefits for wildlife and biodiversity. Their ecological value is recognised by organisations such as the National Trust, the RSPB, Friends of the Earth and the Bumblebee Trust. Solar Energy UK's 'Natural Capital Best Practice Guidance' published in May 2022 shows the important contribution that well-managed solar projects can make to enable wildflowers, pollinators and other wildlife to thrive, contributing many thousands more acres of high biodiversity habitats, and providing a broad range of benefits for people who live nearby. Sites should comply with the BRE (2014) Biodiversity Guidance for Solar Developments
- A 50MW solar farm in Leicester has produced a 62% biodiversity net gain <https://www.solarpowerportal.co.uk/50mw-solar-farm-biodiversity-net-gain-leicestershire/>
- It is recognised that despite rapid changing technology this should not be a reason to delay the implementation of renewable energy projects especially if rural communities are keen to move away from expensive and polluting fossil fuels.

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Renewable sources of energy including solar farms wind turbines can be upgraded, replaced or removed as necessary. They are not permanent structures.

Other comments:-

1) Might there be some reference to areas undertaking the Local Area Energy Plan (LAEP)? as described by Skidmore (2023),

‘Many areas want to undertake Local Area Energy Planning (LAEP), an approach that aims to identify the most effective route for an area to decarbonise its energy supply, which can be a foundational building block for net zero plans. This is an area where more precise central government guidance would be helpful:

*“[LAEP] could underpin a clearer, more evidence-based process to identify key collective investments and strategic choices that could achieve a more cost-effective local balance of energy resources, including opportunities to partner with local industrial clusters.” – Energy Systems Catapult530 (Mission Zero - Independent Review of Net Zero Skidmore pg 135)*

2) The government provides a range of support to help local areas decarbonise. This includes:

The Local Net Zero Accelerator Programme

The Local Net Zero Hubs Programme

Funding for Net Zero Go, an on-line platform to provide councils with information to develop Locally focused net zero projects

Funding for Community Energy projects

<https://www.gov.uk/government/publications/local-net-zero-support-for-local-authorities-and-communities/local-net-zero-central-support-for-local-authorities-and-communities>

3) It is good to see the Renewable and Low Carbon Study for the East Hampshire District (2018) referenced. It might be helpful to also reference some of the recent assessments that have been carried out by Southampton University

i) An updated assessment of the technical and economic potential for renewable electricity generation in the pan- Hampshire area (v2.0)

ii) An assessment of the wider Hampshire distribution network capacity and potential constraint points for renewable generation.

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1 March 2024

## Energy Alton's Response to EHDC's Draft Local Plan 2021-2040

Generally East Hampshire District Council (EHDC) should be complimented on the sentiment and tone of the Draft Local Plan as a response to the Climate Emergency. The Local Plan will affect the environmental standards of thousands of homes (at least 9,082) to be built over the period of the plan, a critical time for achieving net zero. This Plan will have a significant effect on the carbon emissions produced in East Hampshire. It is, however, particularly important that EHDC ensures that the final document will be fully enforceable. and it is in this area that we feel certain serious omissions need to be drawn to EHDC's attention. We set out below the proposed policies and Energy Alton's related comments (in blue text, for clarity):

### Policy CLIM 1 Tackling the Climate Emergency

**CLIM 1.1** Development must contribute to mitigating future climate change whilst adapting to its impacts and helping society to meet local, national and international climate related objectives.

**CLIM 1.2** Buildings and open spaces will be designed to maximise their resilience to extreme weather whilst offering nature-based solutions to a changing climate.

**CLIM 1.3** Planning permission will be granted when the following requirements are met:

- a) The operational carbon dioxide emissions of residential development would be reduced to a net zero level through on-site measures that are appropriate to site related constraints and opportunities.
- b) The regulated carbon dioxide emissions of major non-residential development would be reduced to net zero through on-site measures that are appropriate to site related constraints and opportunities.
- c) The embodied carbon emissions of development would be reduced, including through the careful choice, use and sourcing of materials.
- d) Any transport infrastructure (roads, footpaths, cycleways) has been designed to prioritise walking and the use of public transport.
- e) Infrastructure to support the use of zero-emission vehicles would be provided.
- f) Development has been designed to minimise the overheating of building, conserve water supplies, reduce the 'urban heat island' effect and provide or contribute to shaded and sheltered routes through open spaces.

**CLIM 1.4** For new-build residential development (other than householder applications) and non-residential developments over 500m<sup>2</sup>, a Sustainability Statement will be submitted to demonstrate a development's compliance with the energy hierarchy, its achievement of net-zero requirements and the ways in which it prioritises sustainable transport and implements climate resilience. The Sustainability Statement will include details of how policy criteria a) to f) are met by a development proposal and how this will be monitored through its implementation.

With respect to CLIM 1.3 a) and b) above there is no definition as to how the term 'appropriate to site related constraints' would be interpreted. Without such a clause the document is wide open to challenge by developers who will be able to use their 'Sustainability Statement' provided under Policy CLIM1.4 to argue that any minor improvements they have suggested meet the criteria required.

With respect to CLIM 1.3 c) whilst it is heartening to see mention of embodied carbon in the document, there is no reference to any specific accepted method of assessing levels of embodied carbon which would be used for calculating reductions in embodied carbon.

We strongly suggest that EHDC adopts or adapts the Net Zero Carbon Toolkit, recently produced by three District Councils as a practical and easy-to-navigate guide on how to plan a Net Zero housing project: <https://www.westoxon.gov.uk/media/2ddb125k/net-zero-carbon-toolkit.pdf>

## **Policy CLIM 2 Net Zero Carbon Development Operational Emissions**

### **Policy CLIM 2.1**

New development will demonstrate how it addresses the climate emergency through implementing the principles and meeting the relevant requirements that are set out below.

- a) All proposals should follow the Energy Hierarchy (set out in the document fig 4.4) when designing new buildings and structures for purposes of minimising their energy demands.

Requirements for all new residential development

- b) All proposals for new homes will be informed by calculations of their predicted energy use intensity (EUI) prepared using an operational energy model. The calculations should be set out in the Sustainability Statement and will be expected to demonstrate that each new dwelling would achieve a space heating demand of not more than 15 kWh/m<sup>2</sup>/year and a total energy demand of not more than 35 kWh/m<sup>2</sup>/year.
- c) Developments will generate at least the same amount of renewable energy on-site as their annual electricity demand for the operational energy of new homes (which should accord with criterion b), above.
- d) All heating requirements should be met without on-site use of fossil fuels.

Whilst it is welcomed that CLIM 2.1 b) states that each new dwelling would achieve a laudable space heating demand of not more than 15 kWh/m<sup>2</sup>/year and a total energy demand of not more than 35 kWh/m<sup>2</sup>/year, there is no reference to a fabric first approach to energy conservation. Instead, the Policy relies on the generation of on-site energy through solar energy

[www.energyalton.org.uk](http://www.energyalton.org.uk)

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Company number 7886523

which in turn increases the amount of embedded carbon dioxide within the development. Such an approach would be extremely difficult for a planning authority to enforce and hence we would suggest that projects employ a fabric first approach to energy conservation and be required to be enforced using the Passivhaus Planning Package design tool to ensure compliance.

The East Hampshire Net Zero Evidence Base Study states that (p28) “an alternative approach might be to give developers the option of showing compliance via some sort of third party assessment scheme. In this case they would simply be asked to show proof of certification, and EHDC would not need to review detailed energy statements.” Passivhaus certification would fulfil that requirement and remove the demand for expertise to assess applications which have an increase in specialism around energy.

Detached dwellings in particular (with a poorer form factor) should be required to have Passivhaus certification to ensure meeting the target of 15 kWh/m<sup>2</sup>/yr for space heating. This would lead to inherently more thermally efficient design solutions. As a rural area, tendency towards detached dwellings is likely to be strong, but needs to be balanced with appropriate energy measures.

A report on Passivhaus Construction Costs - [https://www.passivhaustrust.org.uk/UserFiles/File/research%20papers/Costs/2019.10\\_Passivhaus%20Costs\(1\).pdf](https://www.passivhaustrust.org.uk/UserFiles/File/research%20papers/Costs/2019.10_Passivhaus%20Costs(1).pdf) - references (p11) an analysis that the additional cost of meeting the 15 kWh/m<sup>2</sup>/year space heating requirement is only around 4% of the average build cost. The benefits of Passivhaus construction go beyond reducing carbon emissions, to also reducing the risk of moisture, noise and other issues, bringing broader improvements in health and wellbeing.

Exemplar Local Plans, produced by other local authorities and drawing on Passivhaus requirements and methodology, can be viewed via <https://www.passivhaustrust.org.uk/news/detail/?nId=1209>

We suggest that a pre-application design review should be mandatory to ensure appropriate quality schemes reach planning application stage.

With respect to EHDCs background paper <https://www.easthants.gov.uk/media/7870/download?inline> Energy Alton believes this report to be unduly pessimistic in view of the experience in Ireland which had the same Building Regulations as Britain in 2010 and a very similar building stock. Ireland stayed on their pathway to sustainable, zero carbon homes, however George Osborne cancelled the same approach in Britain in 2015, with his Fixing the Foundations report. Ireland is now building near zero carbon homes with an airtightness of 1 air change per hour at 50 Pascals and ventilated using MVHR systems.

**CLIM 2.2**

Exceptions to meeting criteria b)-d) will only be made due to site-specific technical constraints or where development would otherwise be rendered unviable as per the outcomes of a project-specific viability assessment. Where exceptions are made, the Sustainability Statement must explain why the requirements of b)-d) cannot be met and the degree to which each requirement will be met, where the objective is to address the requirements as far as practical to do so given the relevant constraint(s).

CLIM 2.2 suffers in the same way as CLIM 2.1 a) & b) above, in that the terms 'site-specific technical constraints' and 'project-specific viability assessment' are too broad and not defined sufficiently to be easily enforceable. Also, if a sustainability statement can justify exceptions to this rule, this compromises the target entirely if offsetting is allowed – new buildings could generally meet this standard with appropriate design approaches.

The East Hampshire Net Zero Evidence Base Study makes several mentions of using offsetting for developments to reach net zero “where this cannot be delivered onsite” (p27). We strongly agree with the suggestion that “there are legitimate concerns about the effectiveness and additionality of offsetting schemes”. For example, a recent investigation found that over 90% of rainforest carbon offsets by the largest global certifier, Verra, were worthless - <https://www.theguardian.com/environment/2023/jan/18/revealed-forest-carbon-offsets-biggest-provider-worthless-verra-aoe>. For new developments, offsetting offsite should not be allowable and becomes a easier temptation to use rather than intrinsically improving a design. Comment should be explicitly made in the local plan to reflect this. This would avoid lower standards in implementing a fabric first approach (as identified in fig. 44 energy hierarchy).

**CLIM 2.3**

Applicants should confirm a metering, monitoring and reporting strategy as part of a detailed (i.e. full or reserved matters) planning applications.

Requirements for all new non-residential development

- e) All proposals for the development of 500m<sup>2</sup> or more of non-residential floorspace (measured as gross internal area) should achieve a 100% regulated carbon emissions reduction from Building Regulations Part L 2021 (or future equivalent legislation). On site renewable energy generation should be proposed where this would meet the requirements of Policy CLIM4
- f) All other proposals must demonstrate how they have sought to reduce emissions as far as possible, exceeding the energy efficiency requirements of Part L 2021 (or future equivalent legislation).

CLIM 2.1 e) refers to a 100% reduction on the Building Regulations. This is an unhelpful way of expressing any saving, as a clear quantitative target has not been given.

Requirements for development involving existing buildings

**CLIM 2.4**

Where development involves the extension, alteration or retention of existing buildings, applicants should aim to meet the above residential or non-residential policy requirements (criteria a)—f) as applicable. If this is not technically feasible or where development would be rendered unviable as per the outcomes of a product-specific viability assessment, the Sustainability Statement must explain why the relevant criteria cannot be met and how criterion a) has been implemented to reduce energy demands to the lowest practical level.

**CLIM 2.5**

Retrofitting measures to improve the energy efficiency of existing buildings will be supported, subject to other policies of the development plan.

**CLIM 3 Net-Zero Carbon Development: Embodied Emissions**

**CLIM 3.1**

All development will be expected to reduce the carbon emissions arising from the production of its building materials, their transportation, installation and maintenance and their disposal at the end of their lifecycle.

**CLIM 3.2**

For development proposals of 10 or more new homes, estimates for the development’s whole life-cycle emissions (excepting operational energy) should be calculated and reported in accordance with a nationally recognised Whole Life Carbon Assessment, Throughout the design, procurement, construction and post-construction stages, decisions should be taken to identify and make reductions in carbon emissions.

CLIM 3.2 should relate to all developments of 4 or more new homes, to include all speculative development other than very small sites. This will also avoid the possibility of developers of larger sites splitting their development into smaller sections to avoid the possibility of enforcement.

**CLIM 3.3**

For proposals on previously developed land the following hierarchy should be followed in respect of any existing buildings and structures:

- a. Renovate and retrofit
- b. Re-design and re-purpose
- c. Demolish and re-use or recycle the materials on site.



There is a presumption against demolition unless it is demonstrated that steps a) and b) would lead to a similar or higher embodied carbon emissions or that there would be significant planning benefits that outweigh the carbon savings of retaining existing buildings or structures

[CLIM 3.3 is a welcome inclusion.](#)

## **CLIM 4 Renewable and Low Carbon Energy**

### **CLIM 4.1**

Proposals for renewable energy schemes, including ancillary development, will be under a presumption in favour of permission where the direct, indirect, individual and cumulative impacts on the following considerations are or will be made acceptable. This means that:

- a) The impacts are acceptable having considered the scale, siting and design and consequent impacts on landscape character, visual amenity; biodiversity; geodiversity; flood risk; townscape; heritage assets, the settings and the historic landscape including impact on the South Downs National Park and the Surrey Hills Area of Outstanding Natural Beauty and highway safety and rail safety and
- b) Aeronautical and other military considerations have been satisfactorily addressed and
- c) The impacts are acceptable on the amenity of sensitive neighbouring uses (including local residents) by virtue of matters such as noise, dust, odour, shadow flicker, air quality and traffic.

**CLIM 4.2** The Local Planning Authority will support schemes for wind-based energy where they are located in potentially suitable areas. The Local Planning Authority will also support schemes for solar-based energy proposals. Site specific assessments and design will still be required.

**CLIM 4.3** Where planning permission is needed, the Local Planning Authority will support proposals which are necessary for, or form part of, the transition to a net zero carbon East Hampshire. This could include proposals for energy generating technologies to meet the requirements of Policy CLIM2; energy storage facilities (such as battery storage or thermal storage) and upgrade or new electrical facilities (such as transmission facilities, sub-stations or other infrastructure).

## **CLIM 5 Climate Resilience**

### **CLIM 5.1**

All development should be located and designed to avoid or minimise the risks associated with a changing climate, taking account on the latest available evidence on the nature and extent of these risks.

**CLIM 4.2**

Development proposals should include site-specific and building-specific measures that ensure the safety, comfort, health and well-of occupiers and visitor. These measures should include:

- a) Building designs that will minimise the risk of overheating (focusing on layout, form, massing, fenestration, materials, roof design and shading devices) whilst also allowing for a level of passive heating so that net zero carbon requirements would be efficiently achieved.
- b) The inclusion of green and blue infrastructure that introduce or augment natural features to provide substantial areas of shade, shelter and cooling within the development and where appropriate on its boundaries. New green infrastructure should provide a mix of species that are resilient to pests, diseases and changes in growing conditions associated with climate change: and
- c) Site and building layouts that will provide comfortable external spaces and internal refuges to mitigate the effects of extreme weather

**CLIM 4.3**

For new residential development, private or communal space should be of a size, shape and orientation to enable residents to grow food and create space for nature within residential plots or the development site as a whole.

**CLIM 4.4**

All development that include landscaping must also include some form of rainwater collection to reduce reliance on mains water for irrigation



Local Plan Team  
East Hampshire District Council  
Penns Place  
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GU31 4EX

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

4 March 2024

Dear Sir / Madam

**East Hampshire Draft local plan 2021-2040 (Regulation 18) January 2024**

Master Land & Planning Ltd is instructed by **English Rural Housing Association (ERHA)**, who welcome the opportunity to comment on the Regulation 18 consultation for the East Hampshire Draft Local Plan 2021-2040.

These representations are submitted via email and comprise:

- Representations below with cross-references to the appropriate paragraphs and policies; and
- Associated evidence.

Please can our client be kept informed of the progress of the Local Plan.

Yours faithfully

## **Paragraphs 9.62 – 9.70 Rural Exception Sites – the role of English Rural Housing Association**

English Rural Housing Association (ERHA) are a non-profit organisation that have been providing affordable housing to rural communities in England since the early 1990s. ERHA works in partnership with those communities, parish councils, landowners and local authorities to deliver a unified approach, and aims to be the foremost specialist provider of rural affordable housing in England to help sustain the economic and social life of rural areas.

Affordability in rural areas is worsening, with high property values, increased aspirations to live in the countryside and limited development of new homes meaning many local households are now unable to find a home they can afford and remain within the rural community where they have grown up or where they work. The absence of affordable homes is a national crisis, exacerbating rural poverty and driving the real and growing problem of rural homelessness. The **'Homelessness in the Countryside: A Hidden Crisis'** (March 2023) report (enclosed) conducted by University of Kent and University of Southampton identify that rural areas receive 65% less funding per capita than urban areas for homelessness prevention resulting in the funding for genuinely affordable housing being highly inadequate and having limited impact in rural areas.

The provision of affordable housing can therefore have a transformative impact on individual lives and communal vitality, being an effective economic stimulus to support communities and rural regions to thrive. Planning policy needs to actively enable the growth and development of rural areas. In order to achieve this, the Country Land and Business Association set out that in their 2022 report **'Sustainable Communities: The Role of Housing in Strengthening the Rural Economy'** (enclosed) that LPAs should be mandated to undertake housing needs assessments across all rural settlements so that identified local needs can be met at the local level.

Currently owning and managing over 1,500 homes across 130 villages, the mission of ERHA is *"to build and manage affordable housing for local people in rural communities in England and to be an advocate for affordable rural housing"*. They seek to build high-quality attractive homes with minimal environmental impact through energy efficient solutions that ensure affordability and local access for generations to come.

ERHA are a trusted partner and registered housing association with a top-tier regulatory grading for Governance (G1). Their financial stability and status as an Investment Partner with Homes England ensure that resources can be secured to develop affordable housing, catering to a diverse range of needs through affordable rental properties, shared ownership and other discounted sales options.

Most of the affordable houses delivered by ERHA are through rural exception sites. Delivering small scale bespoke developments that are built to meet local needs for local people. However, there are many challenges to their delivery, of which planning policies is one. The recent paper **'Land, Landowners, and the Delivery of Affordable Homes in Rural Areas'** (September 2023) (enclosed) was completed by University College London in collaboration with ERHA undertakes a 'deep dive' into the use of rural exception sites as a mechanism for delivering new homes in the countryside. The number of new homes built using rural exception sites is a fraction of wider housing delivery and, more crucially, a drop in the ocean when it comes to responding to demonstrable unmet housing needs in rural areas. The many challenges of bringing forward new exception sites span a range of issues, however planning policy and the approach of each local planning authority do have significant impacts, as outlined within the paper.

ERHA therefore welcomes the opportunity to contribute to your emerging Local Plan so that it sets a proactive and viable framework to encourage rural exception sites to be brought forward at the earliest opportunity.

## Policy H4 – Rural Exception Sites

### Existing National Policy Context

The NPPF (December 2023) defines rural exception sites as:

*“Small sites used for affordable housing in perpetuity where sites would not normally be used for housing. Rural exception sites seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection. A proportion of market homes may be allowed on the site at the local planning authority’s discretion, for example where essential to enable the delivery of affordable units without grant funding.”*

A variety of NPPF policies support the delivery of housing to meet specific needs and boost the supply of housing in rural areas, by stating:

*60. To support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay. The overall aim should be to meet as much of an area’s identified housing need as possible, including with an appropriate mix of housing types for the local community.*

*63. Within this context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. These groups should include (but are not limited to) those who require affordable housing; families with children; older people (including those who require retirement housing, housing-with-care and care homes); students; people with disabilities; service families; travellers; people who rent their homes and people wishing to commission or build their own homes.*

*82. In rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs, including proposals for community-led development for housing. Local planning authorities should support opportunities to bring forward rural exception sites that will provide affordable housing to meet identified local needs, and consider whether allowing some market housing on these sites would help to facilitate this.*

*83. To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.*

The PPG provides further guidance on a range of points, stating:

***How can planning policies support sustainable rural communities?***

*People living in rural areas can face particular challenges in terms of housing supply and affordability, while the location of new housing can also be important for the broader sustainability of rural communities. Strategic policies will need to be informed by an understanding of these needs and opportunities, especially where authorities in designated rural areas wish to demonstrate that it is appropriate to set lower thresholds for affordable housing than those which apply generally.*

*The nature of rural housing needs can be reflected in the spatial strategy set out in relevant policies, including in the housing requirement figures for any designated rural areas. A wide range of settlements can play a role in delivering sustainable development in rural areas, so blanket policies restricting housing development in some types of settlement will need to be supported by robust evidence of their appropriateness. A neighbourhood plan can allocate additional sites to those identified in an adopted plan so long as the neighbourhood plan meets the basic conditions.*

*Local planning authorities can support opportunities to bring forward rural exception sites by working proactively with landowners and potential delivery partners such as parish councils and community land trusts.*

*Paragraph: 009 Reference ID: 67-009-20190722*

***Where can rural exception sites come forward?***

*As set out in the National Planning Policy Framework, rural exception sites can come forward in any rural location. In designated rural areas and areas designated as Green Belt, rural exception sites are the only sort of exception site than can come forward.*

*Paragraph: 011 Reference ID: 67-011-20210524*

***What sorts of affordable housing can be delivered on rural exception sites?***

*Rural exception sites should seek to address the affordable housing needs of local communities. They can be used to deliver any form of affordable housing, including First Homes, provided this is supported by appropriate evidence of local need, such as a local housing needs survey.*

*Paragraph: 012 Reference ID: 67-012-20210524*

### ***Can rural exception sites deliver market housing?***

*Rural exception sites can deliver a small proportion of market housing, provided that it can be demonstrated that this is necessary in order to ensure the overall viability of the site. Local authorities and neighbourhood planning groups are encouraged to produce policies that specify in further detail the proportions of market housing would be considered acceptable, and under what circumstances.*

*Other than allowing for market housing, what other ways can the viability of rural exception sites be improved? Where a local authority is satisfied because of the evidence provided that a rural exception site would not be viable if it were required to deliver only affordable housing, they may wish to consider whether alternative approaches to securing site viability could be pursued. This could include (but is not limited to):*

- allowing for flexibility in tenure, size, or type of housing to be provided*
- allowing for flexibility in the phasing of the development*
- accepting the provision of a commuted sum to be used for provision of affordable housing on another site or sites*
- obtaining other sources of funding such as grants*

*Plan-making authorities are encouraged to set policies that set out in greater detail the circumstances in which alternative approaches to viability would be considered.*

*Paragraph: 013 Reference ID: 67-013-20210524*

### ***How can land for rural exception sites be identified?***

*Organisations, local authorities, or individuals seeking to bring forward rural exception sites are encouraged to take a proactive approach to identifying suitable locations for rural exception site delivery through such measures as:*

- actively seeking the details of relevant landowners and approaching them directly, in order to determine their level of interest in putting their sites forward for such developments*



- *working in collaboration with local communities, parish councils and other relevant groups to identify and deliver rural exception sites*

*Paragraph: 014 Reference ID: 67-014-20210524*

#### ***How can rural exception site delivery be encouraged?***

*Strategies for bringing forward rural exception sites will vary depending on local circumstances. However, where local authorities are keen to increase the number of rural exception sites that can come forward in their areas, or developers or landowners have site(s) that they wish to pursue, they may wish to consider establishing or strengthening working relationships with relevant groups including (but not limited to):*

- *parish and town councils*
- *neighbourhood planning qualifying bodies*
- *housing associations*
- *local landowners*

*Close partnership working between these different groups may assist in managing expectations in terms of the timescales, financial rewards and resource commitments required for effective rural exception site delivery.*

*Paragraph: 015 Reference ID: 67-015-20210524*

### **Existing Local Plan Context**

The existing East Hampshire Draft Local Plan 2021-2040 has an objective to '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'. Based upon the unmet housing needs and past delivery within the Planning Position Statement (2023), the minimum number of homes required in the Local Plan Area between 2021-2040 is 9,082 homes which is equivalent to 478 homes per annum. For affordable homes, the East Hampshire Authority Monitoring Report 2022-2023 (AMR) has analysed that a net total of 134 affordable homes were delivered between 2022 and 2023 across the district, accounting for approximately 30% of all completions.

### **Policy H4 and whether it is a sound way to deliver rural affordable housing through exception sites in East Hampshire?**

The Housing and Employment Development Needs Assessment 2022 (HEDNA) for the District Council states that there is an annual need for 316 affordable home ownership homes and 297

social and affordable rent homes in the district, totalling 613 units per annum up to 2038. This equates to a split of 52% affordable home ownership and 48% social and affordable rented housing.

ERHA support the inclusion of a rural exception sites policy within the Local Plan as an important mechanism to deliver small scale rural affordable housing. However, modifications are required in order to address paragraphs 16 and 35 of the NPPF to ensure a positive framework is set for rural exception sites.

The first paragraph of the policy states that, outside of settlement boundaries, developments of affordable housing or closely related to villages will be supported. Typically, Rural Exception Sites meet the needs of a parish and not purely a specific village. Therefore, the reference to the relation to villages should be amended to refer to a settlement to avoid confusion and not limit development to a specific place. There are also other cases where Rural Exception Sites may meet the needs of adjoining parishes, resulting in a range of smaller parishes or settlements and development in one will support a range of communities. A flexible wording is required to address these concerns.

Bullet point A of the policy makes reference to the local needs and states where this has been established by specifically referencing Hampshire Home Choice which was agreed by the Local Planning Authority. The point clearly sets out that Rural Exception Sites should refer to this information to support development and understand current needs. However, there are a range of additional sources that are equally applicable to identify needs including the Local Housing Needs Surveys, such as an Applicant or community commissioned housing needs survey. Therefore, further reference to additional documents would be needed to widen the evidence upon which schemes can come forward.

Bullet Point B states that the proposal must not be in excess of the local identified need, this should be taken out completely as a provision if limited under A to the Hampshire Home Choice. There will be circumstances where the register is inaccurate primarily because there will be individuals who are unaware of the Housing Register or do not think they are eligible for the need, therefore do not sign up. If the development then doesn't exceed minimal requirements, there is likely to be an overall shortfall in the total number of affordable homes required in the borough if every development follows the same procedure. Paragraph 83 of the NPPF states that '*planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services*'. Therefore, local needs should be sufficiently met to support the growth in settlements. It is recommended that this part of the policy is removed to allow for

more flexibility in order to equate for the concealed households who are not on the Council's Housing Register but would benefit from being so, including those identified through Housing Need Surveys.

Bullet Point C suggests that any site must be adjacent to and well related to the village and existing facilities while the second part of Bullet Point D states that the settlement should have adequate facilities and services to ensure the development is sustainable and the proposals will enhance or maintain the vitality of rural communities. The terminology 'adjacent to' is unduly restrictive and some flexibility is sought as not all land that comes forward for exception sites is contiguous and adjacent to a settlement / village. The PPG at Reference ID: 67-011-20210524 confirms rural exception sites "*can come forward in any rural location*". While it is likely to be that the majority of needs would arise associated with the defined villages (in the spatial strategy) where adequate services and facilities are located, restriction of meeting needs away from other rural communities would go against responding to local needs with resultant harm to their vitality and viability.

Bullet Point D requires the proposal to be at a '*size proportionate the settlement*' which the EHRA consider should be deleted. There is no basis for imposing such a criterion that restricts the size of a rural exception site to be proportionate to an existing settlement, as paragraph 78 of the NPPF only permits those schemes that directly respond to local needs. The key consideration is that exception sites are '*small scale*' and this accords with the definition in the NPPF. The extent of local needs will therefore be the determining factor to influence the scale of a proposal, to be shaped by the constraints and opportunities of each individual site.

Bullet Points E and F, in short, ensure that long-term occupancy of dwellings are controlled by a legal agreement so housing will continue to be available for local needs at affordable prices and to ensure affordable rent prices are brought forward to be managed by an affordable housing provider. These principles are supported.

Bullet Point G sets out the occupancy restrictions of Rural Exception Site development to a person in housing need that is either a resident of the parish, works in the parish, or has strong links with the parish. The point emphasises on a parish, which is contrary to the references made to villages and settlements used throughout the policy, therefore this should be amended to be coherent throughout. However, the point does reflect the importance of identifying existing needs and concealed households by making the right provision of housing for the right people to meet local needs in rural communities, in turn enhancing its vitality and viability.

Bullet Point H requires consideration to be made to Entry-Level Exception Sites suitable for first time buyers or those looking to rent their first home. However, this type of Exception Site is now irrelevant within the NPPF and has been replaced with community-led developments or similar. Therefore, it is a requirement that this point is removed entirely. Furthermore, Entry-Level or Community-Led Developments should be covered by a separate policy.

Bullet Point I suggests consideration to be given to incorporation of a small proportion of (up to 30%) market housing if it can be demonstrated that it is necessary to ensure overall viability of the site. This point is supported because it encourages better proportions of affordable homes over market homes to meet current demands. It recognises that market housing is still needed to help deliver a viable scheme and ensure affordable housing needs are met and clearly addresses the persistent and acute undersupply of rural affordable housing in the district.

The PPG at reference ID: 67-013-20210524 allows for the inclusion of a small proportion of market housing where necessary to ensure the overall viability of the site. Whilst it is important to ensure the primary purpose is to provide affordable housing in perpetuity, in our experience it is becoming increasingly necessary for proposals to provide some market housing to make the proposal viable and deliverable in the short term, as a result of external factors such as higher build costs and landowner expectation. This has recently become more evident through the regrading of many registered housing providers from V1 to V2, which reflects the broader decline of economic conditions and business capacity from the disconnect between rent levels and costs. Therefore, it can be understood that Bullet Point I of the Policy recognises that market housing may be needed in some cases to deliver schemes and ensure affordable housing needs are met.

### **Modifications to Address Consistency with National Policy**

Amend Core Policy H4 (Rural Exception Sites) as follows:

Outside of defined settlement boundaries, small scale developments of affordable housing on land adjoining or closely related to ~~villages~~ settlements will be supported provided that:

- a) there is an identified local need as indicated by the most recent Hampshire Home Choice, Housing Need Survey or other evidence, ~~and as agreed by the Local Planning Authority~~; and
- ~~b) the proposal must not be in excess of the local identified need; and~~

- c) any site must be adjacent to ~~and~~ or well related to the ~~village and existing facilities settlement~~; and
- d) the proposal ~~to be of a size proportionate to the settlement which has adequate facilities and services~~ responds to the local needs to ensure the development is sustainable and the proposal will enhance or maintain the vitality of rural communities; and
- e) the Local Planning Authority must be satisfied that the long-term occupancy of the dwellings can be controlled to ensure that the housing will continue to be available for a local need at an affordable price and this will be defined by a legal agreement; and
- f) the affordable rent products will be brought forward and managed by an affordable housing provider, approved by the Local planning Authority; and
- g) occupancy (rented tenures) both initially and on subsequent change of occupancy, will be restricted to a person in housing need, unless otherwise agreed by the Local Planning Authority, that is:
  - a. A resident of the parish; or
  - b. works in the parish; or
  - c. has strong links with the ~~parish~~ settlement as set out by Hampshire Home Choice or Housing Need Survey;
- ~~h) proposals for Entry Level Exception Sites suitable for first time buyers (or those looking to rent their first home) will also be considered; and~~
- i) consideration will be given to incorporation of a small proportion (up to 30%) of market housing, if it can be demonstrated that this is necessary to ensure the overall viability of the site.

# HOMELESSNESS IN THE COUNTRYSIDE: A HIDDEN CRISIS

March 2023

Dr Carin Tunaker, Professor Helen Carr and Dr Laura Burke with Dr Guillermo Reyes-Pascal



# Executive Summary

This report was commissioned, funded and co-designed by a coalition of housing and homelessness organisations concerned by the growing yet unacknowledged problem of rural homelessness.

## The research found that:

- Rural homelessness is a real and growing problem that requires specific, locally informed and properly funded policy interventions. Without active interventions and good preventive services rural homelessness will keep increasing.
- People with intersecting disadvantages are particularly at risk of homelessness in rural areas. Support services are very dispersed and often unavailable.
- The voices of those experiencing, or who have experienced homelessness in rural areas are rarely heard. They told us about the high costs of food and transport and unavailable support services.
- The shame and stigma associated with homelessness in prosperous areas is a significant barrier to getting support. This intensifies the invisibility of rural homelessness which in turn leads to reduced support services, exacerbating need.
- Frontline workers have valuable insights into rural homelessness. 91% of professional respondents to our survey in rural areas told us that they think homelessness has increased in the last five years. This is corroborated by our analysis of the latest statistics from DLUHC which indicates that there is a 24% increase in rural rough sleeping in the past year.
- Rural poverty exacerbated by high housing costs are fundamental drivers of rural homelessness. Severe restrictions in local authority funding since 2009 intensifies risk. Rural areas receive 65% less funding per capita than urban for homelessness prevention who themselves are severely underfunded. Funding for genuinely affordable housing and state support for housing costs are also highly inadequate and have limited impact in rural areas.
- The aftermath of the Covid-19 pandemic and the current cost of living crisis leave people in rural areas at much greater risk of homelessness than before. We have a particular concern that 83% of respondents who work in rural areas think that addressing homelessness has become harder in the past five years.



## We recommend:

- Improved information about the scale and distribution of rural homelessness and more developed understandings about what is distinct about rural homelessness.
- Recognition of and strategies to respond to the problem of rural poverty. This is particularly urgent in the context of the aftermath of Covid-19 and the cost of living crisis.
- A renewed political commitment to ending all homelessness including rural homelessness and other hidden forms of homelessness.
- In the light of market failure, a reconsideration of what it means for housing to be affordable and how genuinely affordable rural housing should be provided.
- A radical rethink of Local Housing Allowances and how they operate to exclude many from accessing housing in rural areas.
- Flexible, multi-disciplinary prevention services must be provided in rural areas with mental health services a priority. Those services must be proactive and seek out those in need. There needs to be innovation and joined up thinking in responding to the dispersed nature of rural homelessness.
- The provision of sustainable, reliable and affordable public transport links between rural and urban areas and market towns.
- Listening to those who are experiencing, have experienced or are at risk of experiencing homelessness in rural areas. Those experiences provide vital underpinnings to effective policy making.





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# 1. Introduction

This research report, written by researchers from the University of Kent and the University of Southampton, was funded and commissioned by a number of organisations and Housing Associations working in rural areas who were increasingly concerned by what seemed to them to be a growing yet unacknowledged problem of rural homelessness. Inspired by Rory Weal's research into rural homelessness in the United States, funded by a Churchill Fellowship (Weal 2021), they organised themselves into a Steering Group to see how the knowledge gap and policy vacuum around rural homelessness could be addressed. The members of the steering group are listed in Appendix A.

Research on homelessness in most countries focuses on urban areas, where official statistics record larger concentrations of homelessness. The more dispersed nature of homelessness in rural areas and the perception that these areas are more affluent means they do not receive the same attention. This is not to say that there has not been research on rural housing and homelessness in the UK (most notably Cloke et al 2002, but also Satsangi et al 2010 and Gibbons et al 2020), but there is a significant knowledge gap, particularly post-pandemic, about contemporary rural housing and homelessness issues and the scale, effectiveness and nature of local interventions. There is significant research on rural homelessness in the United States (Spissinger 2019, Weal 2021) and Canada (Waegemakers et al 2016, MacDonald and Gaulin 2020, Buck-McFadyen 2022), as well as some comparative projects (Milbourne and Cloke 2006). An interesting consensus emerges from the literature:

- Rural homelessness is often hidden, invisible and under-reported.

- Rural homelessness requires targeted and specific interventions that are different from those in urban areas.
- National welfare programmes and initiatives are rarely set up to consider their impact in rural areas, which limits their ability to tackle rural poverty (Milbourne 2010).

Our research took place between January 2022 and February 2023, and was a collaboration between the Steering Group and Research Team. The project also benefited from advice and support from a Sounding Board, comprising key organisations and stakeholders concerned with homelessness in the UK. Further information about those involved is available on the project website: [www.research.kent.ac.uk/rural-homelessness](http://www.research.kent.ac.uk/rural-homelessness)

Whilst this report has been written independently of the Steering Group, the authors are very grateful for its careful reading and comments on the contents and would like to acknowledge in particular the input and insights of Martin Collet and Rory Weal. The authors would also like to acknowledge the time and thoughtfulness of all those who responded to the survey, participated in interviews, invited us to projects and joined in conversations about rural homelessness. Without their insights, particularly of those who are experiencing or have recently experienced homelessness, this report would be considerably diminished.

## Research Questions and Aims

The aim of the project is to address the lack of evidence about rural homelessness, paving the way for possible larger scale research projects into rural homelessness. For the purposes of the project we took a broad definition of homelessness, incorporating not only rooflessness but those living in insecure accommodation and/or at risk of becoming homeless in the near future. This

moves beyond England’s definition of statutory homelessness to include consideration of all ‘core’ and ‘wider’ homelessness categories (Bramley 2017). Although the project is small in scale, it has enabled a review of existing knowledge and data and the identification of research gaps. We have also been given ‘snapshot’ insights into the experience of homelessness and rough sleeping in the countryside from interviews and conversations with people who are currently, or have recently been in this situation, who were very generously willing to share their stories. In addition we have benefited from the insights of housing/homelessness professionals from statutory and third sector organisations. Many of those who talked to us have worked on housing and homelessness issues in rural areas for a very long time. We recognise that without their dedication and expertise the situation for those experiencing homelessness or who are at risk of homelessness would be considerably worse.

The research aims to:

- Identify the evidence gap between rural and urban homelessness;
- Consider possible intersectional causes of homelessness that structurally disadvantage certain populations;
- Investigate whether ending rural rough sleeping requires distinct policy responses; and
- Inform government responses to rural homelessness and rural housing policy.

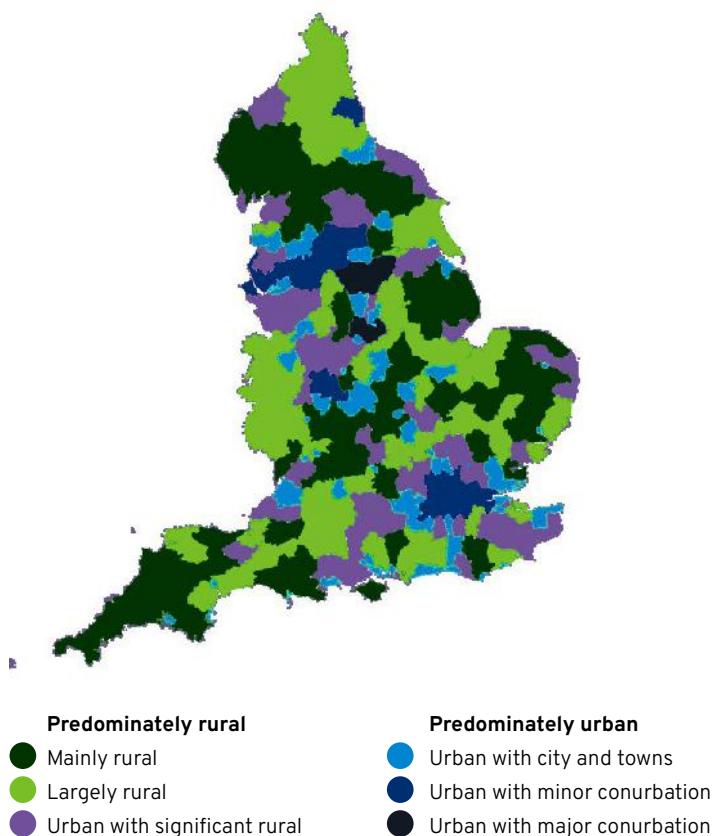
### Field sites

Our research took place in four rural areas, selected to represent different types of rurality throughout England. Choosing a range of rural areas was important as the ways in which homelessness is experienced and responded to locally differs.

In making our selections we drew on the 2011 Rural-Urban Classification for Local Authority Districts in England (Government Statistical Service 2017) which categorises settlements

with a population of over 10,000 as ‘urban’, and recognises three different types of rural local authority districts: ‘mainly rural’ ‘largely rural’ and ‘urban with significant rural’. For coherence and policy impact in a small scale project, we focussed our qualitative research in England, but our survey was open to anyone in the United Kingdom. As the legal framework for housing and homelessness is different in each of the devolved nations, our recommendations and findings focus on England only.

### 2011 Rural-Urban Classification for Local Authorities in England



Our choices of field sites reflected the need to consider areas from different geographical locations in England, and took into account the different dispersal of centres of population within and within reach of the area. We also considered proximity to urban areas, as well as proximity to larger settlements that are still considered rural within the Rural-Urban Classification system. We chose areas

which were not, or at least not predominantly, coastal. We focussed on rural settlements of under 10,000 inhabitants within the counties chosen, and paid particular focus to smaller settlements of under 3,000 inhabitants. Our research sites were South Cambridgeshire, Herefordshire, North Yorkshire and Kent.

### South Cambridgeshire, mainly rural

The district comprises more than 100 villages, and no towns. The district totally surrounds the City of Cambridge, a large urban district with a significant population of students and those working in higher education and research. The district is around 50 miles from London and combines traditional sectors such as farming with technology, finance, and business located at a small number of business and innovation parks. The South Cambridgeshire District Council (SCDC) is based at a business park in the village of Cambourne, about 1 hour from the City of Cambridge. SCDC reports<sup>14</sup> low levels of people who are sleeping rough (5), whereas the City of Cambridge report high levels (23). People migrate from the SCDC area to the city of Cambridge to access the support available there such as hostels and hot food provision. They are also directed to the City by the SCDC. Despite the City of Cambridge and SCDC being two different district councils, there is a clear relationship between them, with people experiencing homelessness, as well as housing and homelessness providers in SCDC, relying on the City to provide support for people sleeping rough, as well as a joint housing strategy. According to our conversations, at the time of the research there were three individuals 'living off grid' in the rural areas on the edge of the City and into South Cambridgeshire. These individuals have been contacted and apparently chosen not to engage with services. The main issue SCDC reports is homelessness arising from the termination of Assured Shorthold Tenancies (ASTs) with no other affordable options available. Homelessness in the area rose significantly between 2012 - 2019 with the largest factors being terminations of ASTs, which overtook the factor 'parents no longer being able to accommodate' their children. Based on

these trends and taking into account rising private rents, SCDC expects homelessness to continue to increase significantly. There has also been a notable increase in complex cases with clients requiring mental health support.

### Herefordshire and North Yorkshire, largely rural

In largely rural areas, such as Herefordshire and North Yorkshire, urban conurbations are further away. Our research found that many people who sleep rough in rural areas are escaping challenging situations in urban centres, such as violence, abuse, crime and drug related negative relationships. This means they do not want to seek support or accommodation in cities or towns, but then find that rural areas have limited options for emergency or temporary accommodation and support. Furthermore, people do not necessarily escape the problems of the urban; county lines drug operations may operate in rural areas that have easy access from the motorway and congregate in the larger market towns.

Public transport to urban centres or larger towns has become more inaccessible in recent years due to reduced services and increased prices, thus limiting options for support even further. Some also told us that they were 'born and bred' in the area and reluctant to go elsewhere, so offers of accommodation out of the area have not been right for them. Some mentioned not wanting to leave support networks in the area or leaving behind their sense of belonging to a village or hamlet. There are therefore both emotional and practical reasons for those experiencing rural homelessness to stay in their local areas. One person with experience of homelessness in a rural setting described it as a 'postcode lottery'; if you happen to be born in a rural area you simply do not have access to appropriate services and support when in a crisis.

In Herefordshire we found that most services were based from the central town of Hereford. Travelling to Hereford from the surrounding market towns and villages was expensive and difficult without a car as the area comprises mainly C roads leading

<sup>14</sup>Rough sleeping snapshot data 2022 <https://www.gov.uk/government/statistics/rough-sleeping-snapshot-in-england-autumn-2022/rough-sleeping-snapshot-in-england-autumn-2022#annex-regional-maps> [accessed 03/03/2023]

off single carriageway A roads. A number of charitable organisations, food banks and church run services provided support in areas outside the town. Farming is the main industry alongside manufacturing and food and drink production. Agricultural jobs are often seasonal meaning that those relying on work in the industry could be without work in the winter months.

In North Yorkshire we found it was challenging to access shelters and support. Much support for rough sleeping is based in areas with more dense populations. However food banks were in operation and were reported to be very busy. There were a range of small charitable and religious organisations providing different kinds of support such as warm spaces and community fridges. Tourism is critical to the economy in North Yorkshire, particularly in the Craven District, which sits on the edge of the Yorkshire Dales National Park. The increase in holiday lettings including AirBnB was explained to us by local organisations as a significant issue affecting the housing market. The area also sees migration of people begging from urban centres to more affluent market towns and those popular with tourists.

#### Kent, urban with significant rural areas

Kent, which is classified as urban with significant rural areas, sees more frequent movement between rural, urban and coastal settings. Kent, like Cambridge, is within easy reach of London, which probably impacts upon the forms of homelessness found in the county. The South East is also the area with the highest concentration of rough sleeping after London (gov.uk). We focussed our field work in the Ashford and Canterbury districts, but spoke with services and organisations across the county. We found that bus services are more frequent than in the more rural counties, and in many places have direct connections to larger towns or cities where support is readily available, compared to more rural areas. However transport in and out of smaller villages can be challenging as some locations have only one service per day. Organisations in Kent talked to us about the transience of homeless populations, particularly those rough sleeping. A typical scenario would be for someone sleeping rough moving between larger towns or cities to

find shelter, support, healthcare and food when needed, but moving into more rural parts for safety at night. However, issues with attachments to smaller villages and not wanting to move out of their locality were also prevalent. Poverty prevents people from staying in their local areas, when they want to. Finding appropriate types of property in terms of affordability and size in rural villages is problematic, and those on the housing register can wait for years, unless they are willing to move to an urban area, as rural housing stock has disappeared through the 'Right to Buy' scheme and has not been replaced.

### Data collection

This research project made use of quantitative and qualitative data. Our methodology comprised four strands of data gathering and evidencing.

- Research/literature review with focus on information and research already available regarding rural homelessness, identifying the gaps;
- Analysis of existing data from DLUHC (Department for Levelling Up, Housing & Communities) regarding rural homelessness and rough sleeping;
- Quantitative data collection: Survey distributed to NGOs and Local Authorities (LAs), distributed nationally via a project website and social media;
- Qualitative data collection: Short-term ethnographic research in our four field sites, and telephone interviews with organisations from other rural areas in the country (see Appendix B). The ethnographic research took place between May 2022 and January 2023, with site visits ranging from 2 to 10 days. During this time we had group and/or individual conversations (informal or semi-structured interviews) with staff in NGOs and local authorities (LAs) as well as conversations with people with experience of rural homelessness. We aimed to speak with at least three people with experience of homelessness

in each area, but there was some variation depending on the time of year of our site visit and people's willingness to partake in the research.

For the ethnographic research we identified local organisations concerned with rural homelessness and we interviewed key personnel, including representatives from the Local Authority Housing and Homelessness teams. We also met and spent time with people currently experiencing homelessness in each area, and completed in-depth interviews (full breakdown of interviews in Appendix B). In collaboration with all interviewees, we mapped out availability of vital services, including health, food, advice, hygiene, public transport.

Our survey (N=157), which was completed by staff members in organisations working with housing and homelessness in the UK (see Chapter 3 for further details), comprised questions relating to experiences of homelessness in different areas of the UK, including specific questions about how rural homelessness differs from urban. Survey data was analysed and cross-tabulated using SPSS and produced statistically significant findings.

### Ethics

We worked with our Steering Group to identify our case study areas and potential participants and to gain informed consent. We prepared information sheets, aimed at different audiences, to inform participants about the project aims and activities, including the organisation and funding of the research, the process of ethical approval, the intended beneficiaries, the project team and access to the data. The sheets also explained what participation in the project would mean (time commitment, activity), how data would be used, the measures to protect confidentiality, the process of data anonymisation, where results will be published, how data will be stored, feedback on the project outcomes, and the right to withdraw from the research. Participants were asked to complete and sign a consent form<sup>5</sup> before taking part in any research activities. People who were experiencing

homelessness at the time of the project were offered shopping vouchers for their time. To protect those taking part in the project we ensured that all interviews took place with a support worker present, or in a shelter with support staff available. All participants have been anonymised, including place signifiers that may give away their locations.

For qualitative data we made use of a confidential, professional transcription service to transcribe recordings of interviews and meetings. Ethnographic fieldnotes, interviews, telephone interviews and group interviews were analysed in a two-tiered thematic approach, using coding to identify key issues and then completing more detailed analysis to unpack relevant information that related to our key themes.

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<sup>5</sup>In some instances verbal consent only was obtained at the request of interviewees.

# Good practice example: **Pop-up legal clinics**

## **Pop-up Legal Clinics**

The Chief Executive of two small separate homeless charities told us about how they responded to the problem of getting legal advice to people who are homeless or threatened with homelessness in rural areas. They created 'pop-up' legal clinics which use local libraries and similar sites. They bring in a solicitor from a London Law Centre on Zoom, they

have support workers there, and they provide legal advice that way. It has a cost, but it is much more sustainable than setting up a law centre which would not really work in a rural area. At the moment the advice is limited to housing and homelessness but they are thinking of extending it to adult social care.





## 2. Rural Governance and Housing Law

**In this section we explain the formal policy responsibilities for housing and homelessness in rural areas and set out the legal framework as it impacts upon people who are experiencing or threatened with homelessness. Here we will also consider the criminal law as it affects people experiencing homelessness. The section will put the findings from the survey and field sites into their broader legal and bureaucratic context.**

### Local government

The structure of local government varies from area to area. In most of England there are two tiers of local government – county and district – and responsibility for council services is split between them. District councils are responsible, inter alia, for housing and homelessness services. County councils are responsible for social services including adult social care. The complexity of the problems that underpin rural homelessness means that responsibilities for services that individuals may require may be split between district and county level. Our professional interviewees noted that the bureaucratic divisions between county and district councils can impede the wraparound care that those experiencing homelessness or are at risk of homelessness may need. Particular difficulties have been experienced as a result of county councils historically having control of Supporting People funding whilst district councils have housing and homelessness responsibilities.

The county council/district council split is not present in all rural areas. Whilst unitary authorities which provide all local government services in their areas are generally concentrated in cities and larger towns there are now six shire county councils that are unitary, including Herefordshire, one of our field sites. North Yorkshire, another of our field sites, is due to become a unitary local authority in April 2023 replacing North Yorkshire County Council, and seven district and borough councils. This will bring together spending power and services to reduce the impact of rising costs. It is anticipated that savings will be directed towards housing, health care, transport links and local enterprise.

At the time of our field work, in each of our other two research sites, Kent and South Cambridgeshire, there was a county council/district council split. South Cambridgeshire is however part of a combined authority, Cambridgeshire and Peterborough. Being part of a combined authority does not replace the existing local authority structure but it is a means for pooling resources and making collective decisions. There was some evidence that this worked well for the effective delivery of services.

### The legal framework

The legal framework differs in each of the devolved areas of the UK. In this report we are concerned with England where the law about individual entitlement to housing assistance is set out in Part 7 of the Housing Act 1996. The responsibilities upon housing authorities have been considerably extended since then, first by the Homelessness Act 2002 which facilitated a strategic approach to housing and homelessness and more recently by the Homelessness Reduction Act 2017 which focussed on prevention. It places duties on local authorities to intervene at earlier stages to prevent homelessness in their areas. It also requires housing authorities to provide homelessness services to all those affected, not just those who have ‘priority need’.

The current Homelessness Code of Guidance was last updated on 31st January 2023. It provides extensive policy guidance on how local authorities should operate the legislation. Some of the housing professionals we interviewed suggested that priority need requirements were a barrier to providing effective help.

### The Housing Act 1996 (HA 1996)

The law about homelessness is not expressed in terms of individual rights but in terms of duties that local housing authorities have towards certain individuals who are homeless or threatened with homelessness.

In summary, local authorities owe duties to provide accommodation (or assistance to obtain accommodation) to some people experiencing homelessness. These duties only arise if an applicant is

- i. homeless or threatened with homelessness
- ii. not subject to immigration control, and
- iii. has not left their previous accommodation intentionally.
- iv. In addition, they must fall into a category of priority need, which includes
  - a. pregnant women
  - b. people with dependent children, and
  - c. people who are 'vulnerable as a result of old age, mental illness or handicap or physical disability or other special reason'.

Where the local authority has reason to believe an applicant is homeless or threatened with homelessness, they have a responsibility to inquire whether any duties are owed to them. If an applicant successfully establishes they are owed a duty, the local authority can decide to house them in the private rented sector.

### Priority need

Various updates have been made to the categories of priority need since 1996. The Homelessness (Priority Need for Accommodation) (England) Order 2002 strengthened the assistance available to people who are homeless or threatened with homelessness by extending the priority need categories to homeless 16 and 17 year olds; care leavers aged 18, 19 and 20; people who are vulnerable as a result of time spent in care, the

armed forces, prison or custody, and people who are vulnerable because they have fled their home because of violence.

The Domestic Abuse Act 2021 amends Part 7 of the 1996 Act to further strengthen support available to victims of domestic abuse by extending priority need to all eligible victims of domestic abuse regardless of whether they have children, if they become homeless as a result of fleeing domestic abuse. Domestic abuse is broadly defined in the legislation to include behaviour which is controlling or coercive, psychologically or emotionally abusive and financial abusive as well as physical or sexual abuse and violent or threatening behaviour.

The other significant legal change in connection with priority need is the decision of the Supreme Court in *Hotak v London Borough of Southwark* [2015] UKSC 30 (Meers 2017). The Court decided that when judging vulnerability a housing officer must compare the applicant before them with an ordinary person if made homeless, and not, as previously thought, with an ordinary actual homeless person. This not only simplifies the legal test but also makes it clear that decisions on vulnerability must take account of all an applicant's circumstances.

### Local connection

Several of our professional interviewees suggested that the lack of local connection was a barrier to people receiving local authority assistance. This may be because they have misunderstood the law on local connection, or that local authorities are inappropriately using local connection as a gate-keeping exercise.

The Housing Act 1996 provides that, if an applicant has no connections in the area they are applying, but they do have a connection (known as a 'local connection') to another local authority, the local authority receiving the application is permitted to refer them back to that other authority. It does not, as is often mistakenly stated, mean that an individual must have a local connection with a particular area if they are to make an application there. A local connection can be established through residence, work or family connections.

### Ineligibility

There are certain categories of people who cannot apply for housing help because they are statutorily ineligible for housing assistance although they are entitled to advice and information free of charge. These rules are complex and subject to change, but in summary they require either that an applicant is habitually resident (has a settled home) in the Common Travel Area i.e. the UK, the Channel Islands, the Isle of Man and or the Republic of Ireland or that they are people from abroad who are specifically eligible for housing assistance. In general people subject to immigration control (that is people who require leave to enter or remain in the UK (whether or not such leave has been given) are not eligible for housing assistance but there are some exceptions. These include refugees, people with indefinite leave to remain and EU settled status as long as they are habitually resident, people with humanitarian protections and people with leave granted under Article 8 of the Human Rights Convention.

### The Homelessness Act 2002

This Act introduced requirements that local housing authorities adopt strategic approaches to tackling homelessness by requiring (i) regular reviews of levels and likely future levels of homelessness in their districts and (ii) homelessness strategies aimed at the prevention of homelessness.

### The Homelessness Reduction Act 2017 (HRA)

The HRA, which came about at least in part as a result of the campaigning work of Crisis, introduced five key changes to the legal framework set out in the Housing Act 1996 (Cowan 2019 )

- i. people threatened with homelessness should receive proper advice;
- ii. a duty is placed on specified public authorities to refer applicants to housing authorities ('the referral duty');
- iii. local authorities must work with applicants to produce a personalised plan of action following an assessment;

- iv. local authorities have a duty to prevent homelessness ('the prevention duty')
- v. local authorities have a duty to relieve homelessness ('the relief duty').

The Act also extends the definition of 'threatened with homelessness' so that duties are owed if it is likely a person will become homeless within 56 days (as opposed to 28 days under the 1996 Act). Someone who is served with a valid notice under s.21 of the Housing Act 1988 to end their assured shorthold tenancy is also treated as if they are threatened with homelessness if the notice has expired or will expire within 56 days and their rented accommodation is the only accommodation that is available for them to occupy.

Our professional interviewees generally welcomed the Homelessness Reduction Act, although one commented that it was like 'Marmite'; either loving it or hating it. Whilst it was full of good intentions it was a 'bureaucratic sledgehammer'. Their wish was that the bureaucracy be streamlined, and that front line workers should be involved in the design of any preventive service.

### Criminal law and homelessness

Concerns about the unproductive impact of criminal law on people sleeping rough are long standing. Although provisions repealing the Vagrancy Act 1824 have been enacted via the [Police, Crime, Sentencing and Courts Act 2022](#), the repeal is not to be implemented until the government decides upon replacement provisions. The government has indicated that it intends that the replacement law will prioritise those specific forms of begging that can be most detrimental and which may involve aggressive behaviours and it will provide for responses that encourage and mandate individuals into support (DLUHC 2022). The consultation on the replacement provisions closed in May 2022 but to date there have been no proposals published about alternative provisions. Squatting of residential property was criminalised by s.144 of the Legal Aid, Sentencing and

Punishment of Offenders Act 2012 despite evidence from Crisis that criminalising squatting would only work to further criminalise vulnerable people and that squatting was more a reflection of scarcity of provision and inadequate support and assistance than evil intent (Crisis 2011). There have been some suggestions that the criminalisation of squatting has led to poor outcomes and even death (Hern 2013).

There is a raft of other anti-social behaviour measures from criminal behaviour orders to dispersal orders that are available to the authorities to control the behaviour of experiencing homelessness. Of these perhaps public space protection orders (PSPOs) are the best known. Introduced by the Anti-Social Behaviour, Crime and Policing Act 2014 PSPOs replaced previous legislation and introduced flexible locally focused powers to deal with nuisances or problems which are perceived to harm the local community's quality of life. An order will specify an area where harmful activities may be taking place and can impose conditions and restrictions on people using the specified area to prevent the prescribed behaviour. The impact of these measures on people experiencing street homelessness has been researched by Heap et al (2022) who note a strong correlation between the behaviours associated with people experiencing street homelessness and the sanctioned behaviour such as sitting on the pavement. They report that,

*People experiencing street homelessness said they felt constantly policed within a PSPO area. The PSPO can be considered a mechanism for controlling the street sleeping population. Many of our participants felt harassed by the nature of the policing, feeling continually on edge. This was fuelled by the high volume of informal interactions with the policing bodies where they were repeatedly told to move on.*

*(Heap et al 2022: 136)*

*People sleeping rough are also more likely to be subject to informal enforcement measures, such as being moved on by the police (Crisis 2017, Heap 2022).*

Avoiding the police is likely to contribute to the invisibility of rural homelessness. It also potentially diverts people from support rather than engaging with their needs. As Heap et al note,

*There was consensus amongst our participants that the way the PSPO was policed, such as moving people on and tipping away alcohol, did not solve the underlying ASB problems. This view was supported by the participants experiencing street homelessness who confirmed that the PSPO did not change their behaviour, but instead made their lives more difficult and unpleasant. It was also clear from these participants that the PSPO was not often used to engage and support (Heap 2022: 138).*

#### Criminality associated with homelessness

The association of homelessness with criminality can act as an additional barrier to the provision and access to effective support.

One hostel in Cambridge often got phone calls from the police after noise complaints from neighbours. The neighbours complained about groups of people smoking crack and being antisocial in a park backing onto the hostel and assumed it was people using the hostel who were causing the issues. A charity worker told us that it wasn't people in the hostel, whose beds were in high demand, who were being antisocial in the park. However, neighbours simply linked the behaviour to the hostel. This served as an example of how people in the area had a lower tolerance for anti-social behaviour as well as the stigma and criminal association attached to homelessness. This is despite the fact that research by Crisis has shown that people sleeping on the street are almost 17 times more likely to be victims of violence compared to the general public.

On the other hand sometimes breaking the law was the only way some people felt they could survive on the streets:

*"I know a lot of homeless people like me brother, he was, and me brother was homeless for five and a half years before he got his*

*property. And yeah, and then the council was on the verge of kicking him out 'cos they didn't like him and because of his criminal record. Obviously, he had to go out stealing to go and get food. He had to do what he had to do to survive, that's what most homeless people do, that's why some homeless people go out, do serious crimes 'cos they know they can go to prison, they've got a roof over their – they've got three meals a day, at least they've got a bed and everything to depend on like”.*

Instances of crime can have serious effects on community attitudes. Cambridge is a city known for cycling, and bicycles are a popular mode of transportation. One charity worker told us how they were disgusted by an online social media group that named and shamed bicycle thieves.

Often, stealing and selling bicycles was a source of income for people experiencing homelessness. The online group claimed that thieves were mainly drug addicts who had ‘already lost all dignity’ and invited photo and video footage to be posted to the group so the community could identify them. Whilst it was obviously wrong to steal bicycles, the charity worker was disgusted at the aggression and verbal abuse the online group directed at people experiencing homelessness, and the lack of sympathy and understanding for their situation. Sometimes people’s family members would intervene and defend people accused of theft, explaining their difficult situations and asking the community to ‘give them a break’.



# Good practice example: Mobile community hub

Turning Tides is a West Sussex single homelessness charity that runs various rural homelessness initiatives. Their mission is to end local homelessness, putting local communities at their heart. This includes the predominantly rural areas of Horsham and Mid Sussex. Rough sleeping is much more hidden than in the towns but with such a huge geography they struggled to make sure people rough sleeping could find them. The first thing they learnt was to enlist local businesses, park staff etc to be their eyes and ears for referrals, but a further challenge was to find a place to meet people sleeping rough. As a solution, they started a mobile hub in a converted double decker bus.

It is highly visible when parked up in various locations. It meant Tom, who has been rough sleeping for 6 years with severe alcohol issues, could meet his outreach worker safely, have showers, warm food and make plans. He had been in and out of hostels for years. Over time Turning Tide's worker based in the bus has managed to build trust with Tom and after some temporary hostel stays he will now go into one of their Housing First flats leading to long term independence.

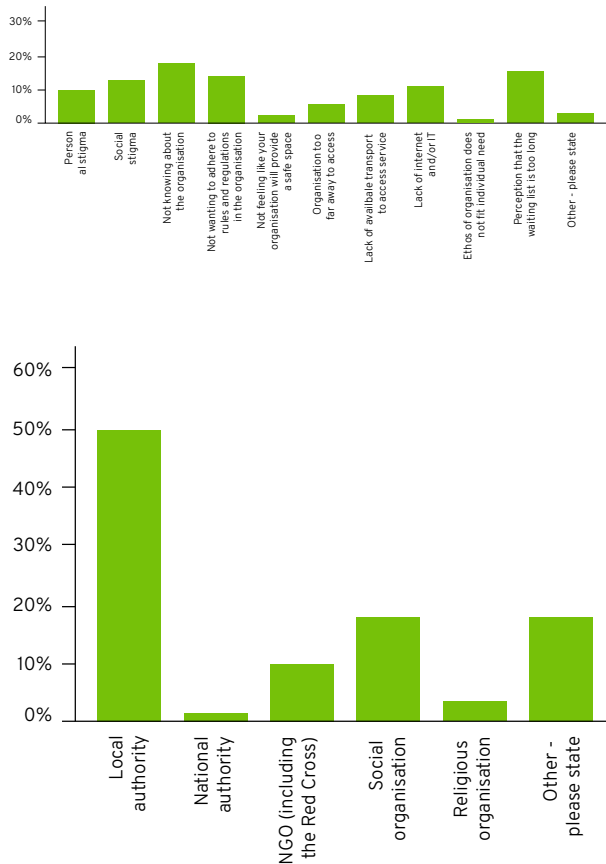


### 3. Survey Findings and National Data

The survey was distributed online via social media and email and through our project website. It consisted of approximately 60 questions relating to homelessness in rural areas, including one free text question. Our respondents (N=157) were spread across the country, with higher response rates from the South of England. The survey was open to anyone in a housing or homelessness organisation in the UK, but the majority of our respondents were from England. We have analysed findings from the survey overall, as well as analysing results from respondents who stated their organisation is based in a rural area.

Those who completed the survey were from Local Authorities (50.5%), NGOs such as campaigning organisations (10%) and social organisations, such as shelters (18%), and some did not fit any of these categories (18%) and 68% were from rural areas. It is also worth noting that 34% of those who completed the survey reported that they had experienced homelessness themselves in the past.

Our survey was not designed to, and nor did we have the resources to produce accurate figures for the scale of homelessness in rural areas, but it did give an indication of how organisations working with rural homelessness view the problem.



# Main findings



consider homelessness to be a significant or acute problem, with 55% stating it is a significant problem in their area of action, and 31% considering it a major problem or an emergency.



of all respondents from rural and urban areas think that homelessness has increased in their areas in the past five years.



of respondents from rural areas believe homelessness has increased in their location in the past five years.



of respondents who work in rural areas think that addressing homelessness in rural areas has become harder in the past five years.

## Our survey respondents highlighted that rural homelessness is distinct from urban homelessness and that those experiencing homelessness in rural areas receive less support.



of respondents believe that rough sleeping is experienced differently in rural compared to urban areas.



of the respondents consider the overall experience of homelessness in rural areas is different from urban scenarios.



of the respondents think that the reasons for rural homelessness are different from urban homelessness.



of those who work in rural areas believe that rural providers are less supported in comparison to their urban counterparts.



think that the future prospects for rural providers are negative, although nearly the same percentage of respondents stated that they do not know (44%).



The two most common responses from the open-ended question asking what is distinct about rural homelessness referred to invisibility and lack of resources. Respondents highlighted the perception that rural homelessness does not exist or that people are less aware of it, because they don't see it. They also highlighted that urban areas tend to have more resources to deal with homelessness which may be at the expense of rural settings.

*“People do not believe that rural homelessness exists, but it does. There are far fewer accommodation options in rural villages with high second home ownerships and few AST [Assured Shorthold Tenancies], and we do not build sufficient social housing.”*

*“Provision of accommodation and support for homeless people tends to be concentrated in urban areas, yet many rural residents are understandably unwilling to move to urban areas to access services.”*

## Drivers for rural homelessness

We asked our respondents to tell us what they believe are the three most important drivers for homelessness in their area. The survey showed that LAs and organisations believe the three most important drivers of rural homelessness are a lack of funding and resources, followed by a lack of affordable accommodation and emergency accommodation, and a lack of mental health provision.



80%

of respondents believe that the main obstacle in addressing homelessness in their area is structural (lack of funding/resources/housing), rather than individual (reasons relating to choices or actions by the individual).

## What are the three most important drivers?



29%

of all respondents stated that a lack of affordable housing and emergency accommodation is the most important reason for the increase in homelessness in their area in the past five years.

Respondents from rural areas stated that the three most important drivers for homelessness in their areas are:



16%

Lack of affordable housing



14%

Decline of social sector housing as a proportion of all housing



11%

Financial problems

**Other drivers:**



**9%**

of all respondents stated that substance misuse is one of the top 3 reasons behind the increase in homelessness in their area



**11%**

of all respondents believe that mental health is one of the top 3 reasons for the increase in homelessness in their area



**43%**

of all respondents stated that housing (both emergency and affordable housing), B&B's and shelters (Emergency accommodation; Hostels; Assured Shorthold Tenancies (ASTs); Housing First) are lacking in their areas

Respondents from rural areas stated that the 3 most important services lacking in their areas were:



**45%**

housing (Emergency accommodation; hostels; AST's; Housing First);



**16%**

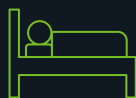
mental health services; and



**12%**

domestic abuse/gender based violence services.

**What are the services most in demand in your area?**



**18%**

of all respondents stated that the services in most demand in their area is emergency accommodation



**18%**

of all respondents stated that the services most in demand in their areas are mental health services



**12%**

of all respondents stated that food (including food banks and soup kitchens) is the service in most demand in their area

*“Lack of services available, overstretched statutory services, limited housing availability, lack of funding support for homelessness charities, breakdown of partnership working around people sleeping rough by local authority [are some of the biggest challenges]. People living with complex needs not sufficiently supported. [Further problems include] Major cuts to funding for floating support services Lack of work opportunities, lack of temporary accommodation, lack of transport.”*

### Proportion of respondents listing barriers in their top 3 in rural areas

Respondents told us that stigma is one of the most important barriers to people seeking support in rural areas. The lack of affordable and reliable public transport was also noted in the free-text comments as a very big problem in rural areas.

- 23% of respondents think that stigma, either personal or social, is one of the three most important reasons/barriers that people experiencing homelessness face when seeking support.

*“We provide services in a rural area which attracts wealthy incomers, resulting in a housing market that is almost impossible to access for those with modest incomes. It seems at times that the wealthy incomers are the most vociferous opponents of new rural affordable housing schemes, and we often hear prejudice against ‘those sorts*

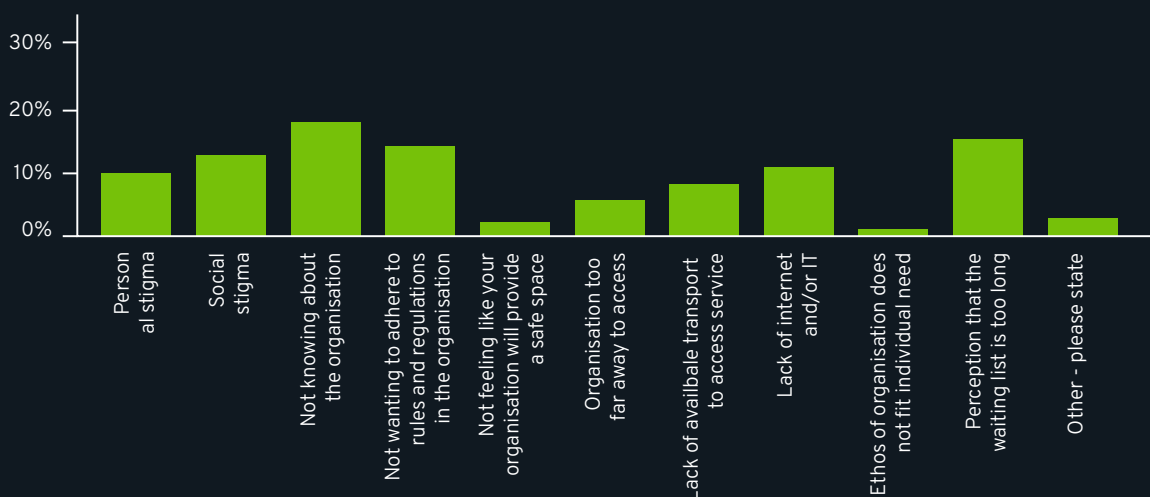
*of people’ who require affordable homes.”*

*“Rural communities tend to be more insular and sometimes less welcoming.”*

- In our free text comments many commented on travel being an extremely important factor in the challenges of rural homelessness.

*“I think that there is a lot more hidden homelessness in rural areas. There are fewer services as the demand is lower, access to services is difficult due to poor transport links. Low wage economy and super ageing population in a beautiful area means that there is a prevalence of second/holiday homes. Social/affordable housing is difficult to access so people sofa surf. There are fewer people with [no recourse to public funds] NRPF as there is little to attract them to the area - no shelters/work prospects/housing/visible migrant support services.”*

Rural respondents: Main driver for increase of homelessness in the past 5 years (choose up to 3)	Percentage
Decline of social sector housing as a proportion of all housing	14.34%
Growing fragmentation of families	4.78%
Lack of affordable housing	15.81%
Reduced welfare provision	9.19%
Tighter mortgage regulation and higher costs for first time buyers	2.94%
Unfavourable market conditions	2.21%
Addiction	7.72%
Discharge from prison	5.15%
Financial problems	10.66%
Leaving the care system	3.68%
Mental illness	9.93%
Relationship breakdown (including domestic abuse and violence)	11.03%
Other reason	1.84%
Do not know	0.74%



## National data

### Scale of rural homelessness according to government statistics

In addition to our survey analysis, we examined official statistics on rough sleeping and homelessness in England. In official statistics, the scale of rough sleeping in rural areas appears to be small in comparison to urban homelessness. In other words, the number of people sleeping rough in rural areas is smaller than that of people in urban areas. However, our qualitative research and survey have highlighted that organisations in rural areas perceive homelessness to have increased over the last five years, and many report that they believe the figures in official statistics are not accurate. Additionally, although the number of people experiencing homelessness in the countryside are lower than in urban areas, the increase in reported rough sleeping in rural areas is nearly as high as in urban areas.

### Rough sleeping data

The Department for Levelling Up Housing and Communities' (DLUHC) snapshot data from 2021 showed a total of 2443 people were sleeping rough in one single night in England, out of which 382 were found in rural areas<sup>4</sup>. The total figure was a decrease of 9% from the previous year (DLUHC 2023a).

In 2022 the number of people sleeping rough has risen drastically to 3069, which is an increase of 26% from the previous year. Rural areas: 473 people were classified as sleeping rough in one single night in rural areas. This represents an increase of 24% (23.82%) in comparison to the same areas in the previous year.

Urban areas: 2,302 people were classified as sleeping rough in one single night in urban areas. This represents an increase of 25% (24.84%) in comparison to the same areas in the previous year.

## Homelessness data

According to Crisis (2023) the rising levels of rough sleeping are also happening alongside increases in households accepted as statutorily homeless, as well as higher numbers of individuals in temporary accommodation, including children.

With figures currently available for 2021-22, the initial figures of assessments (290 180) nearly matches the pre-covid figure from 2018-19 (292 690), but the total amount of households owed a prevention or relief duty has increased (2018-19: 269 500) (2021-22: 278 110), which is an increase of 3%. Current data for the financial year 2022-23 is not yet available, but if the trend continues we can expect further increases in both households assessed as homeless, and those owed a prevention or relief duty.

## Homelessness Prevention Grant

Funding allocations for homelessness prevention in rural areas is also significantly lower than in urban areas. For example, in the total allocation of the Homelessness Prevention Grant 2022-2023 rural areas will receive £29.270.553 and urban areas £263.508.049. This means that in the next financial year, rural areas will receive £234.237.496 less financial support than their urban counterparts (DLUHC 2023b). As population size is smaller in rural areas, we looked at this figure per capita.

- **Rural** local authorities receive **£2.50** of financial provisions for homelessness per capita.
- **Urban** local authorities receive **£7.15** of financial provisions for homelessness per capita.

**Rural areas receive 65% less<sup>5</sup>** financial provisions for homelessness per capita in comparison to their urban counterparts.

<sup>4</sup>The figures disaggregated by rural and urban areas have been calculated as follows: The rural category corresponds to the category "Predominantly Rural" from the 2011 Rural-Urban Classification for Local Authority Districts in England. The urban category corresponds to the category "Predominantly Urban" from the 2011 Rural-Urban Classification for Local Authority Districts in England. The category "Urban with significant rural" has been discharged as it cannot be catalogued as either rural or urban. These UK figures are directly extracted from the raw data provided by the UK Gov and relate to the jurisdiction of England. <https://www.gov.uk/government/statistical-data-sets/live-tables-on-homelessness> and <https://www.gov.uk/government/statistics/rough-sleeping-snapshot-in-england-autumn-2022>

<sup>5</sup>This figure was calculated using government data regarding the Homelessness Prevention Fund for the year 2022-23 and calculated by total population size in Local Authority Districts considered as 'rural' and 'urban', as defined in footnote 3. We also analysed the data per household in the areas, and the figure was similar. Please note that there are other sources of funding available for homelessness, rough sleeping prevention and intervention. We have analysed one funding stream only, showing an indication that funding is significantly less in rural areas. <https://www.gov.uk/government/publications/homelessness-prevention-grant-2022-to-2023>



## Case Study **Mary's Story**

Mary\* has two children. She was evicted from her house and moved into a caravan. When her children were taken into care she moved into a tent. Someone disturbed her tent when she went into the local town to get food so she slept on a bench in the entrance of the church.

She was able to collect clean water from the farmer whose land she was staying on. She had been in trouble with the police for lighting fires to keep warm.

*'Like if I'm in a tent, obviously, I've got to – I know I've had the police come to me a couple of times, like for making a fire... they came there and told me to put the fire out, I'm like,*

*"How else do you want me to eat?" I've even had friends, obviously, I can't steal, I've even had friends who are saying, "Have you eaten today?" And I'm like, "No." And they've gone into town and they've actually stole food for me so I could eat that thing.*

*'...some of me family don't drive and they've said come over and they can stay with me and I'm like – and that's down in [place], and it's going to cost you about £60 a train ticket and I'm like I haven't even got 60p.'*

\* Names have been changed to protect people's identities.

## 4. Understanding Rural Homelessness

One of our major findings is that rural homelessness is distinct from urban homelessness and requires specific policy attention. Causes, experiences, contexts and responses differ from urban areas and there are specifically rural characteristics that need to be taken into account. In this section of the report we consider some of the ways that experiencing homelessness in rural areas is different from experiencing it in the urban context. Before we do that however we acknowledge that drawing a clear line between the urban and the rural when understanding homelessness is increasingly complex.

### Rural and Urban relations: the elimination of the rural?

In many ways our research goes against the grain of contemporary social research which suggests that the significance of place, and the meaning and importance of distinctions such as those between the urban and the rural, and the centre and the periphery, are changing and diminishing as a result of technological innovation (Agnew 2011). Whilst in this report we are insisting on the need to pay attention to the specificities of the rural, we acknowledge that it is at times challenging to draw clear distinctions between issues and experiences that are rural as opposed to urban; in a country as small and urbanised as England the urban and the rural are inextricably linked. Movement between areas takes place on a daily basis through work and other commitments, as does the transport of goods and services. People who are rough sleeping in rural areas may have recently left urban areas, perhaps driven away because of the expense of accommodation in the city, or attracted to the rural area because of the possibility of unskilled seasonal work. Alternatively they may be passing through a rural area on their way to the city. A survey respondent summarised the issues as:

*“Lack of resources, and the resources we have are in larger towns leading to migration of rough sleepers to those towns. Geographical neighbours are similarly rural and have similar lack of resources leading to a lack of beneficial sharing of what little resources are available, for example: London boroughs can share resources within a few miles, rural authorities do not have that luxury with transport infrastructure difficulties and the huge geographical areas.”*

One example of the blurring of the rural and the urban is the case of ‘county lines’. ‘County lines’ is a model of drug dealing which has emerged during the past 10 – 15 years in contrast with previous forms of street level distribution (Coomber and Moyle 2018). In the county lines model ‘drug dealers are engaging in outreach activity and travelling from their urban hub to provincial towns and cities within a wide radius of their home turf, not just to deliver their product to that location as a ‘weight’ but also to retail it there themselves’ (Coomber and Moyle 2018: 1324). Not only is the supply of drugs increased but vulnerable people are harnessed to undertake the supply operation at street-level. Dependent drug users, vulnerable women, looked after children, and adults with welfare needs are habitually targeted and recruited in a variety of front-line roles including as ‘drug runners’, ‘commuters’ and for ‘cuckooing’ - the practice of a drug dealer taking over a vulnerable person’s accommodation and using it as a drug dealing base (Coomber and Moyle 2018). Whilst people we talked to in the course of this research mentioned county lines as a problem, the scale of this research project did not enable us to investigate it further, but we consider it requires far closer academic attention as it is likely to have an increasing impact upon rural poverty and rural homelessness.

Despite this evidence of a blurring of rural and urban space, we gathered evidence of particular rural problems.

### Rough Sleeping

Specific challenges for people sleeping rough in rural areas include not being able to easily access food, water and other supplies. A common response from the people we spoke to who were currently sleeping rough in rural areas was that smaller rural shops charged higher prices, and often located too far away. Food banks in rural areas were also limited and often only open once or twice per week. Donations for food banks are often inappropriate as items need to be cooked, and most people sleeping rough do not have access to cooking facilities. There was also an interesting denial of the fact of rough sleeping in rural areas at all as well as ignorance about service provision. One of our survey respondents said:

*“There are more places to sleep in tents, cars and vans. We get a lot of people who do not realise they are rough sleeping. This is very different in urban areas where a higher proportion of people will sofa-surf. People are also much more removed from services by geography. There is a lack of knowledge about what services are where, what they do and how to access them. As a result, more people develop multiple and complex needs, fall victim to gate keeping, and their situations become more entrenched”.*

In rural locations we found that pets, in particular dogs, were important to combat loneliness and isolation, as well as being needed for safety and warmth. There is extensive literature on the importance of pets to people experiencing homelessness (Irvine 2013, Kerman et al 2019, Blomley et al 2020). Pet ownership can be problematic for people experiencing or at risk of homelessness as it can prevent people getting settled accommodation due to restrictions on pets in the private rented and social rented sectors. One of our professional interviewees told us that she was actively working on developing pet friendly accommodation. We think that pet ownership may be of greater significance in rural areas and may therefore pose a bigger obstacle to rehousing but we do not have the data to verify this. We suggest this could be the subject of specific research. One support worker hinted that they turned a blind eye

to pets being housed in temporary accommodation as they felt it helped people settle much more easily and was a source of wellbeing. A housing professional told us that they were developing accommodation which would allow pets as they recognised the need.

Rough sleeping in the countryside inevitably involves close contact with more settled residents and landowners, particularly farmers. Many of the people we spoke to had relationships with farmers, some of whom extended enormous amounts of goodwill and support to rough sleepers on their farmland. We saw examples of them providing access to clean water, offering cups of tea in the morning and allowing people to camp on their land. Some farmers were also frustrated by regulations that prevented them from allowing people sleeping rough to stay on their land, for fear of being criminalised by local authorities. We were not clear what regulations they were referring to. Not all farmers were positive about people sleeping rough on their land; some had experienced violence and aggression from trespassers and felt forced to contact police and local authorities.

### Hidden Homelessness in Rural Areas

Hidden homelessness is a commonly used term which does not have an agreed definition and can be used to encompass or even disguise a number of complex problems. It often refers to populations that are not visibly rough sleeping, such as those sofa-surfing, squatting, or living in unsuitable accommodation. The term has also been used to refer to minorities within homeless populations, such as LGBTQ+ or ethnic minorities, who are less likely to appear in statistical data. Referring to any type of homelessness as ‘hidden’ is problematic, as Pleace and Hermans (2020) have argued. Defining a person’s homelessness as ‘hidden’ does not reduce their vulnerability within the housing market and does not necessarily address the issues of exclusion they are likely to experience. It can also obscure the many reasons why different types of homelessness are not counted or included in official statistics. Many of the people we spoke with in rural areas described how much rural homelessness is not accounted for. There are



## Case Study **Resilience**

One person who had experienced homelessness in the past was able to live on a friend's dairy farm whilst doing an apprenticeship told us:

*"I grew up in a rural area and I very much felt that it was up to me to fend for myself, right? And I kind of think that is ok I guess....so it's about resilience as well and resilience of communities and resilience of people, though, I was homeless, I didn't not feel isolated, right? There was a community around me and for, you know, me. I could have been part of it if I'd wanted to be...but I think people who have a rural background might be less willing to seek help".*

People with experience of rural homelessness talked about how they were helped by community members, such as farmers who gave them access to land or water, and local people who offered them work. This willingness of support and resilience within rural communities was a lifeline for many who had experienced long term homelessness in rural areas. However this could shield these people from

view. Rural homelessness was an issue that needed resilience when services were not available, but that resilience kept the issue hidden from view.

A young person told us how he focused on survival:

*"I'm pretty screwed on, quite street smart, I know where I - I don't tell anyone my secret location. ... Cos I'm not getting mugged and I'm not getting stamped on and I'm not sleeping in a doorway. 'Cos I live in a tent or what I call a one-bed semi-detached, underneath a tree, out of the way of people, near the wood because that's how you've got to do it."*

He had really thought about what is necessary for survival:

*"Get some good boots, you know I could write a f\*\*\*\*\*g book on homelessness - Homeless for Dummies. Get a four season tent, cos come winter you're going to freeze your t\*\*s off in f\*\*\*\*\*g one season tent, especially the tents they give you here, they are s\*\*t. Sleeping bags here are s\*\*t, you've got to buy - you've got to spend at least £1,000 on stuff".*



a number of reasons for this. Visibility is more challenging in rural areas, in particular for people sleeping rough who hide in farmland or woodland. Those who would otherwise sofa-surf have limited options in rural villages, and may be forced to sleep rough for this reason. Sofa-surfing was seen as problematic by some of our participants.

One participant was concerned with the number of people relying on family and friends for housing, or 'sofa-surfers'. Another told us how the sense of community in the area can be a double-edged sword; people may be able to rely on others, particularly family, in the community, but at the same time, this reliance keeps people 'hidden' from homelessness services and local authorities for a long time. Others may simply be out of sight or relying on the good will of the community. John\* described some of the difficult situations he found himself in:

*'I've slept in abandoned hotels by the river, and under the bridge by the river, and woke up covered in snow...'*

*'One night I slept in an old car park, and the building that was at the back of McDonald's was an old garage and the people who owned it were letting us stay there in like that little garage. But 'cos we were looking after the place they agreed to stay there until he sold it, which they did say in the end and they knocked it down and built all that new motorway...but that was all, that was one of the best places we had. We could lock the door from the inside so no one could get in, and we had a carpet and mattresses on the floor with electricity going from there to the toilet.'*

One homelessness outreach team described the difficulties of engaging people in rural areas versus urban areas:

*'we don't want [our work] to be looking under the bushes. We want to know exactly who is where, and what they're doing so we can help'*

*'...one of the differences, if you were to compare us with a city, it would be, "Go and*

*find somebody in the doorway of Marks and Spencers." And the doorway of Marks and Spencers is fairly well defined. So from the office, you can go and find them, or at least find their sleeping bag. We get, "There's somebody sleeping in a tent on the riverbank. Well, going to find the tent on the riverbank will probably take you two or three hours, first to get there and then to search for the place. And also, try not to fall into the river at the same time.'*

### Youth Homelessness in Rural Areas

Young people face significant differences in their experience of homelessness generally, and also in rural areas. Finding housing for young people is a bigger challenge, due to age discrimination in the private rented sector, for instance many landlords do not accept tenants under age 26 (St Basils 2021). Cuts in benefits (discussed below) have particularly impacted upon young people and the limits placed on Local Housing Allowance for young people, their restriction to single room rates and the disadvantageous benefits rates for under 25 year olds creates further barriers. We heard reports of young people sleeping rough in rural areas, but accessing support during the day with relatives or friends because there are no services available to them.

Even if young people can get work, they remain at risk of homelessness. Mckee et al's research into young people's employment opportunities in rural areas indicated that they were 'lacking in comparison to larger towns and cities. Not only were job opportunities generally limited, participants highlighted a lack of well-paid, full-time, permanent positions as they perceived most jobs to be low-income and on a part-time and/or fixed-term basis' (Mckee et al 2017 :121).

Limited housing stock makes it extremely challenging for local authorities to find suitable accommodation for young people, or for young people to find accommodation for themselves, as most options are unaffordable, or too large or inappropriate in other ways. The housing stock is more homogenous in rural than in urban areas

with houses generally built for families, not for single occupancy or house shares (CLA 2022). Many young people are driven out of their local areas and into urban centres or towns where they might have more viable housing options. In the long term, this creates challenges for villages with ageing populations to maintain local economies. McKee et al argue for spatial nuance in housing research overall; existing literature suggests that while young people in general are facing housing and employment precarity, these challenges may be intensified for those living in rural places. Yet, despite this evidence, spatial distinctions are often overlooked in discussions of 'generation rent'.

A support worker told us about an issue with a young couple who were sleeping rough and in the early stages of pregnancy. They weren't married and due to priority need the pregnant woman was offered temporary accommodation. However her partner was not allowed to join her. For this reason the woman turned down the offer of accommodation as she didn't want to leave her partner.

Young families who had children in schools also face difficulties with the suitability of housing offers when it comes to being housed near current schools, support networks and child care. One housing professional told us:

*"...people wouldn't want to move schools. Yeah, the actual homeless legislation, it makes it clear that, you know, that isn't really a sufficient reason to refuse accommodation, but, you know, I'm a parent and I wouldn't want my children to move schools, and a lot of people might rely on family for child care. So, you know, it's all very well saying we can move, 15 miles away, but then if your child care is in a certain area and you rely on that to actually be able to go out to work in the cost of putting your child, in nursery would be more than you were using a lot of instances."*

## Experiences of Rural Homelessness

In this section we focus on what people experiencing homelessness or have recently

experienced it tell us about their experiences. We heard stories about isolation and loneliness, shame and resilience. People with experiences of homelessness told us about communities coming together to create support, and contrasting feelings of being 'outsiders', being spat on, tents set on fire and violence and abuse whilst sleeping rough.

### Isolation and loneliness

*'Rural homelessness is by far one of the worst things...nobody knows you're there, nobody cares you're there, you are on your own and you're just...free..'*

Rob\* was conflicted about his experience of rural homelessness. His mother had died when he was young and he suffered violent abuse from his step father. After working on funfairs and as a seasonal chef he became a carer for girlfriend and suffered several nervous breakdowns. He lived in the woods for 8 years, and felt it was on the one side the worst thing you could experience, but on the other liberating from the stresses of life, no one bothered him and he was able to live off the land. He would sleep in the woods and trap rabbits, but whilst there was a sense of freedom he also felt this sort of life was 'killing' him.

*'I made trenches, made sure they were water secure...out there all winters, one winter there was three foot of snow... I had to get up every hour and walk around...and I was really thinking, I can't do this, I can't do this.'*

Loneliness and social isolation brought other dangers too. Rob\* described how he was mugged by six people and suffered a brain injury and lost his teeth, he described how he then felt the need to 'get off the streets, 'because it was killing me'. For Rob, in addition to isolation he felt that stigma was a big issue 'as soon as someone looks down at you, as a homeless person, and walks off, that is the most degrading thing ever'.

We asked Fred\* a man who had experience of homelessness what the best thing to do to help people in his situation would be and he said

*“First thing is, talk to them. The homeless get ignored, everything thinks oh they’re homeless so they must be druggies and alcoholic and stuff like that...we’re not, talk to us, we’re lonely, just talking to us is nice sometimes...just don’t ignore us”.*

This participant had found long term accommodation through a charity. Now he was no longer on the streets and felt at home in his accommodation, he didn’t count himself as homeless. However he pointed out that he still referred to the community of people experiencing sleeping rough as ‘we’.

### Shame and Stigma

Another issue Fred described was shame. The shame and stigma people experienced whilst homeless was something that stayed with people long after they received meaningful support.

*“People said to me, weren’t you scared when you were homeless, and I said yeah, in the beginning I was. There were some days, three or four days, you wouldn’t eat...the one thing I didn’t like was every night, having to put your bit of cardboard down, and get into your*

*sleeping bag, and you knew people were watching you...people were staring at you, people were watching, that was the worst thing all together, I couldn’t stand that”.*

Another participant Ed\* shared his experiences of stigma he still suffers even as he is in supported accommodation.

*“To look at me, people wouldn’t realise that I’m agoraphobic and that I can’t stand being around people, and I’ve got severe depression...they only see the size of me and because I’ve been on drugs and where I live and they take an instant dislike to me. But that’s not me, that’s just something that’s happened. They need to get to know the person...don’t judge a book by its cover... this is their problem, they are projecting their own image”.*

Ed described how ultimately the thing that most helped him in the end was ‘people believing in me and being there for me and me being able to feel like I could trust someone.’





## Case Study **North Yorkshire**

Craven District in North Yorkshire is just south of Richmond, the current Prime Minister's constituency. It has a particular problem with second homes. As you approach Skipton from Leeds on the train you pass a number of locks on the canal, showing how the land rises to the Yorkshire Dales. Factory towns, small houses and tall chimneys are part of the post-industrial landscape,

and in the distance is the edge of the dales. Skipton is a small market town that relies on tourism to the Yorkshire dales. Despite a booming tourism industry, the 'economic vitality' of the town reportedly suffers from the lack of a young and enterprising demographic (Craven District Council Homelessness Strategy 2020-2025).

## 5. Drivers of Rural Homelessness

There are a number of factors that emerge from our research that indicate that rural homelessness is a growing and chronic issue that may well become acute in the near future. In this section we consider some of the structural and other issues that impact upon rural homelessness. Taking as our starting point the issues recognised by Cloke et al in 2002, we focus on how rural poverty and the lack of affordable housing contribute to rural homelessness, we then consider the overarching issue of governance of rural homelessness in a section which summarises the relevant local authority responsibilities, welfare provisions and issues relating to crime and anti-social behaviour, including county lines, before turning to recent major events, Brexit, Covid-19 and the cost of living crisis which have had a dramatic impact upon the context of rural homelessness.

Poverty is the single most important driver of homelessness in the UK (Fitzpatrick & Davies 2021) so inevitably rural poverty is a key factor in rural homelessness. Many people are surprised by the existence of rural poverty which, like rural homelessness, is characterised by its invisibility (Cloke et al 2002). This is in part because it is “widely dispersed rather than concentrated in limited geographical areas as in urban “blackspots” (Commins 2004:61) and in part because of its cultural invisibility. ‘There is a tendency to regard rural living as idyllic or ‘problem-free’, or the existence of problems is contested by ideologies which romanticise rural life and the rural environment’ (Commins 2004:61). For Cloke et al the unimaginability of rural poverty and homelessness has consequences;

*Rural spaces can be (re)purified against out-of-place people and practices, either by strenuous denial of the very existence of phenomena such as homelessness, or by purposeful exclusionary practices, designed to move the people, and the troublesome issue, on into its ‘proper’ urban place (Cloke et al 2002:80).*

Understanding the causes and scale of rural poverty and its distinctiveness from urban poverty is complex and problematic and an in-depth discussion is beyond the scope of this report. But it is important to note that whilst urban poverty dominates policy discourse there are poor people in relatively affluent rural areas of England. Our overview of existing research suggests that people in rural areas can be disadvantaged by limited social and economic opportunity, in particular the lack of educational opportunities and the dominance of low paid work, and by constrained welfare provision. In addition costs such as housing and transport can be higher than in urban areas (Cloke et al 2002, Milbourne 2004, Bernard 2019, Shucksmith et al 2021). This leads to social exclusion – the loss of the ability to connect with the services and facilities needed to fully participate in society. Shucksmith et al’s conclusions, from research carried out both before and during the pandemic, that many rural residents are at risk of poverty, while poverty is perceived as an urban issue and that the welfare system is not well adapted to rural lives (Shucksmith et al 2021:4) are very significant in the context of increasing rural homelessness.

### Rural employment

Local employment prospects in rural areas are often limited. As Shucksmith et al noted, in many instances ‘rural work is not ‘good work’, with incomes often volatile and irregular’ (Shucksmith et al 2021:4). Jobs tend to be concentrated in agriculture, tourism and services, sectors known for lower wages. DEFRA statistics published in 2020 indicate that workplace based earnings are lowest in rural areas in England. In 2020, median workplace-based earnings in predominantly urban areas (excluding London) were £25,400 while predominantly rural areas were lower at £22,900. This is distinct from residence-based earnings because many people living in rural areas work in urban areas in higher paid jobs. In 2020, the median residence-based earnings in Predominantly

Urban areas (excluding London) were £25,100, compared with £25,000 in Predominantly Rural areas. This is significant because whilst on average earnings have kept pace with inflation measured by the Consumer Price Index, which has increased by 21 per cent in the years 2009 – 2020, workplace based earnings have provided much more limited protection against inflationary rises. These figures were compiled before the post pandemic cost of living crisis (discussed below) and could explain why housing professionals believe that there are more people homeless or at risk of homelessness. The discrepancy between work-based and residence-based earnings (i.e. the difference between the earnings of those who work in rural areas and those who live in rural areas but work elsewhere) also explains why poverty can be invisible in rural areas. The problem of lower work-based earnings in rural areas is exacerbated by what might be described as a rural premium – the additional costs of energy, transport and housing.

### Energy costs and rural poverty

Individuals are defined as being in fuel poverty if they are unable to adequately heat their homes because of a lack of resources and/or because of the inefficiency of their housing insulation and heating (Boardman 2010). Rural households are particularly susceptible to fuel poverty because many of them are not connected to the gas network. This is due to their distance from the network, which forces them to rely on non-mains gas heating fuels that tend to be more expensive. Additionally, there are concerns about a lack of competition in fuel supply markets in rural areas, as noted by Roberts et al in 2015. The quality of rural housing stock tends to have lower energy efficiency standards with a greater likelihood of such homes being older, detached and built with solid walls so there is less possibility of making meaningful economies. In rural areas there is also a higher concentration of under-occupancy. This leaves ‘some smaller households in disproportionately large properties that require excessive heating to maintain adequate warmth’ (Robinson et al 2018: 80). Energy costs are also higher in private rented accommodation as

landlords have little incentive to invest in energy saving measures.

According to Roberts et al,

*‘Despite the higher probability of being trapped in persistent fuel poverty among urban dwellers, the impact of some of the characteristics already known to adversely influence the level of fuel poverty (living in a flat, and living in private rental accommodation) have an even more negative effect in rural areas than in urban areas. Moreover, they also indicate that an individual from an average rural household is more vulnerable to fuel price increases than an individual from an average urban area (Roberts et al 2015:217)*

Many participants who had experienced rural homelessness reiterated their struggle to access everyday necessities such as water, food and soap. Basic costs and lack of amenities or public facilities led one of our participants to wash clothes in a river. Below one of our participants compares the luxury of a bed and heating with the harsh reality they live with day to day:

*“...when I would stop in me friend’s flat, I actually felt like a queen. I was like, you know, heating, couldn’t get over it. A bed, literally a bed, but I tried sleeping in the bed but I got that used to sleeping on the floor. I got off and actually slept on the floor with a blanket. And like I’d just get up and have a shower or bath, I could wash me clothes any time I wanted. But now there’s no launderette in the town, obviously, I’ve had to use the river to wash me clothes in. I’ve actually gone up to [place], a little shop up town, I’ve had like £1.20, obviously, I bought like little bits and things like that and food. And I had £1.20 left so I bought a 69p bottle of liquid, just to wash me clothes in the river“.*

A housing professional described how one elderly man had been discharged from hospital and made contact with the local food bank in Hereford. However when the food bank went to drop off some

supplies for the man in his rural home, they found he had no heating and electricity.

### Affordable and accessible transport

As a result of austerity (discussed below) local authority subsidies to local transport have been dramatically reduced. The lack of access to affordable public transport plays a critical role in rural social exclusion and rural poverty (Berg and Ihistrom 2019). It provides a significant barrier to accessing services and employment. DEFRA's statistics on rural accessibility by walking and public transport for 2019 indicate that:

- The average minimum travel time to a hospital was a little over one hour in rural areas, compared with a little over half an hour in urban areas.
- Fewer than half the users living in rural areas have access to places with 5,000 or more jobs within 45 minutes, compared with 91 percent of users in urban areas.
- 51 percent of users living in rural areas do not have access to their nearest hospital (DEFRA 2019)

DEFRA's report also points out that for people living in rural areas, making the same journey by car compared with using public transport or walking, had the effect of halving the average minimum journey times. This considerably reduced the disadvantage experienced by those living in rural areas. It suggests that cars are necessary for a minimum living standard but this means that rural households face significant additional costs in order to achieve the equivalent standard of living as their urban counterparts. Smith et al argue that most rural working-age households would need incomes equivalent to 72% or more of national average (median) income. Those unable to afford a car are most likely to rely on buses. But rural bus services have been particularly badly impacted over the past decade. As one of our survey respondents said, in response to why rural homelessness is different from urban:

*“There are less services to start with. Due to distances, transport is a MAJOR issue. Lack of affordable public transport at useful times. Hubs in towns or accessing the Job centre are useless when people cannot get there. Phone and internet can be unreliable, leaving people very isolated. Services will not travel out to rural areas due to cost”.*

The Campaign for Better Transport also points out that:

- Cuts to national and local funding for buses have led to many services being reduced or withdrawn.
- Bus fares have risen much faster than rail fares or motoring costs.
- In many places buses are no longer frequent or reliable, and traffic on the roads can make journeys slow.
- Government messaging during the Covid pandemic damaged passenger trust in public transport and stay at home restrictions impacted on passenger numbers and bus operator revenue which is causing further cuts to services (Campaign for Better Transport 2023).

The CPRE - The Countryside Charity, argues that England should recognise a universal basic right to public transport, backed up with guaranteed service frequency standards, and the government should fund local transport authorities to achieve that level of service. Our research confirms that poor public transport has a very negative impact on rural homelessness.

One housing services officer told how the centralisation of resources and cost of public transport caused issues for keeping employment:

*‘...to rely on social housing, when it is such a finite resource, is very, very difficult in those areas and we have ever sympathy for those particular people, because we sometimes get people who split shifts, for example.*

## Good practice example: **Farmhouse accomodation**

Turning Tides has also leased a five bedroom farmhouse in 100 acres of National Trust land from another charity Lorica. This unique setting has meant that a person they supported had a solution to entrenched rough sleeping. Adrian who experienced homelessness after a family and mental health break down and slept rough in local woods for 4 years, now has a room which looks out

over the woods/fields from the farmhouse. Adrian has told them that it calms him when anxious and if becomes stressed he can walk straight out into the peace of the woods. He has been there over a year and has said that he feels the most settled he has been for many years.







## Case Study **Fred**

Fred\* described how he disguised himself when he was sleeping out on the streets by wrapping his head with scarves. He was afraid someone would recognise him. Fred\* became homeless after an amicable divorce. He moved into hotels, then as his savings dwindled, bed-and-breakfast, then sofa surfing, hostels and eventually found himself sleeping on the streets on a piece of cardboard with a sleeping bag. He slept on the streets of a large city where he

used to work on the public transport network. He refused to beg but was grateful when he woke up with a bag of hot food, a coffee or a sandwich next to his head. For him, the worst thing was the loneliness and lack of human connection. He eventually moved to a rural area with the help of a charity and found friends and a community. Now he likes the ruralness of the area, the peacefulness and waking up being able to see a badger out of his window.

\* Names have been changed to protect people's identities.

*So they might work a morning shift. Go home and then go back out and if they are homeless our temporary accommodations is in the main centre. So if they had to go into our temporary accommodation and they didn't drive, for example, then they would just have to give up their work because there's no way that public transport would allow them to make those kinds of journeys as well as the cost burden as well.'*

As Cloke et al pointed out in 2002, whilst 'homelessness is often about far more than a lack of housing, housing remains fundamental to its resolution. This is particularly the case in rural areas where there are quite simply not the housing options that exist in urban areas' (Cloke et al 2002:194). There is extensive evidence to suggest that the problems of rural housing costs and availability have intensified in the twenty years since Cloke et al's work was published.

Housing is much less affordable in predominantly rural areas. DEFRA statistics published in May 2022 suggest that the average lower quartile house price was 9.2 times the average lower quartile earnings, compared with 8.0 times in predominantly urban areas (excluding London) (DEFRA 2022). The Rural Services Network suggests that excluding London, the average house purchase price is £90,000 higher in rural areas than it is in urban areas. (Rural Services Network 2021). The most affordable form of home ownership, flats are rarely available in rural areas. Flats in rural areas comprise only 4% of the overall housing stock as compared to 63% in city centres (CLG English Housing Survey). Rather than flats developers focus on building larger homes on new market developments, because these secure a better financial return. The constrained supply of smaller homes, especially those that would be affordable or suitable for supporting living, compounds the challenges facing vulnerable and low-income households with little or no realistic housing options in rural areas.

The scarcity of affordable housing in rural areas is exacerbated by ownership of second homes and the increase in holiday rentals, particularly Airbnb. The CPRE - The Countryside Charity's

Chief Executive argues that there must be a 'government response to the fact that our rural housing supply is disappearing into an unregulated short-term rentals market that simply didn't exist six years ago.'

A Shelter blog provides a pithy summary of the crisis in home ownership in rural areas:

*In many rural communities, the market for housing has become divorced from local people and their incomes. Homes are sold for as much as people are willing and able to pay for them. In theory, this means that lower average rural wages should be reflected in lower rural house prices. But in much of the countryside, the market serves primarily second and holiday homeowners and retirees, who have far more to spend on housing than local workers. The market doesn't try to be affordable to local people, because it has plenty of demand from out of the area to feed on. As a result, house price to income ratios are out of control - 13:1 in Horsham, 10:1 in Central Bedfordshire, 9:1 in Cornwall and South Lakeland. (Rose Grayston Shelter blog July 6th 2018)*

With home ownership out of the question for many in rural areas, private renting is often the only option. But it has become increasingly inaccessible to those on low incomes or benefits. Whilst rental prices in general flatlined following the global financial crisis of 2009, real incomes fell, making private renting increasingly unaffordable. More recently rural rents, alongside all other rents, have increased since the pandemic. The cost of living crisis, increased interest rates affecting landlords' mortgages together with some evidence of a decrease in the supply of rented homes and increase in demand have all contributed to higher rents. Kovia Consulting, in research commissioned by the Rural Services Network found that:

*In 2021, on average, the percentage of monthly earnings spent on rent showed very similar levels of affordability in predominantly rural, predominantly urban (exc. London), and urban with significant rural areas (34%).*

*However, for households with the lowest income, rent was less affordable in rural areas. Workers in the 25th percentile for residence-based earnings spent 47% of their earnings on rent in predominantly rural areas, compared to 43% in predominantly urban areas (Rural Services Network 2022:20).*

In Cambridgeshire, one of our fieldwork sites, the university brings students and an elite middle class into the central urban area. This leads to high house prices and high rents which, when combined with the lack of social housing, means that many are priced out of the area. Support workers, usually earning around £24,000 a year, described this as 'social cleansing'.

Even for those who manage to access private renting, their housing situation remains problematic. McKee et al demonstrate their existence is stressful. Private renters experience a lack of control and insecurity which 'has significant impacts on subjective well-being. Security is pivotal to transforming a house into a home. But it also provides an important 'foothold' enabling people to get by, and get on, in life' (McKee et al 2020: 1477). In addition, 'the financial stress individuals were placed under to maintain their tenancy was also clear, with the relative cost of renting further contributing to people's precarious existence' (McKee et al 2020:1477).

There is limited social rented housing in rural settlements. According to the Rural Services Network 12% of the rural housing stock in England is social housing compared with 19% in urban areas (Rural Housing Alliance 2016). The Right to Buy initiative has had a particular impact. The Rural Services Network found that in rural areas only one replacement home was built for every eight homes sold and those replacements are rarely in the same settlement (Rural Services Network 2021). This is particularly problematic for those with strong attachments to place because of family connections or other reasons.

### Lack of emergency and move-on accommodation

People who are homeless require emergency and move-on accommodation but this is very limited in many rural areas and providers have to make difficult choices.

*"We've had to make people homeless in order to house homeless people".*

A support worker explained that in their area the local council lacked housing stock and a large number of homeless people were temporarily housed in B&Bs and hotels. A local church had run a night shelter during the winter months for those sleeping rough, but there were problems once the church was no longer able to provide this service. To provide this service itself, the council then had to convert one of their seven room supported accommodation properties into a night shelter with 17 beds. Consequently, a house which had been providing long-term support for seven people had to be used as a night shelter in order to accommodate up to 17 people nightly. This meant moving seven people out of their homes and into Bed and Breakfast - an expensive and unsatisfactory alternative.

One support worker in a city hostel told us about the lack of availability of services in rural areas:

*"We had this one lady who had lived in [village] her whole life, its a village in the county that is quite rural. Essentially her relationship with her husband had broken down. And so I think she became homeless in that area, but there just weren't any services there to support her, so she came to us".*

A housing officer told us about the issue with Section 21 evictions in rural areas:

*"people are left with eight weeks and they might have lived in a property for 15 years to then try and find somewhere else to live and if that is in a rural area, then you know, there should have more time to try and find accommodation where they want to be... because to put it bluntly, there are some areas*

*in this district where, you know, someone's more or less got to die before that property comes up. You know, it's heartbreaking, because there's, you know, there young families fighting for accommodation in areas where they just can't get rehoused.'*

## Planning, development, and building

There is an urgent need to improve the supply of housing in rural areas which is affordable for those earning local wages. Mechanisms for delivery of homes that are genuinely affordable in rural areas are limited by scale, opportunity, and conservatism.

### Planning

The National Planning Policy Framework (NPPF) sets out government policy on the development and building of new homes - this includes consideration of rural matters. Local planning authorities must operate their own planning policies within the constraints of the NPPF together with any relevant additional guidance. The NPPF provides local authorities with 'carrots and sticks.' The carrots are financial incentives, vital for local authorities that are still accommodating the impact of austerity and are otherwise reliant on local taxation or central government funding. Sticks include a controversial provision, the presumption in favour of sustainable development, which, in lay terms, means allowing more speculative building to make up any shortfall in homes necessary to meet house building targets.

### Affordable housing

Government policy acknowledges the affordability challenge of living in the countryside and the need to enable exceptions to secure land for affordable housing developments. Affordable home ownership is supported through schemes such as Help to Buy and Right to Shared Ownership, with large scale public subsidies above the investment in affordable and social rented homes targeted at lower-income households. A report by the House of Lords Built Environment committee calculated that the Help to Buy scheme would have cost £29 billion by its conclusion in 2023. This is a figure more

than double than the equivalent invested through the Affordable Homes Programme during the same period.

The 'affordable rent' tenure was introduced in 2008 and marked the shift towards lower levels of public grant for Registered Providers (Housing Associations). 'Affordable rents' means that rents set by Registered Providers are set at 80% of market rent, which is 15-25% higher than a social rent for a comparable property. These rent levels are necessary to support the financial viability of development and support higher levels of debt that Registered Providers have secured to fund investment in new homes, at historically low interest rates. But there is a fundamental flaw to the policy. In rural areas the low level of household income makes these 'affordable rents' unaffordable. There is state support available for households unable to afford the higher rents, either from housing benefit or the government's new single welfare payment system Universal Credit. However welfare support for rent is limited to a threshold known as the Local Housing Allowance. This is determined locally using (since 2009) the lowest 30th percentile of the rental market. In many rural areas this threshold is insufficient to cover private rent levels and in high value areas even falls below affordable rent levels. The repeated freezes to LHA levels in recent years have further reduced the support available. Given the level of demand for affordable housing, eligible households not fortunate enough to secure a home have been supported within the private rented sector, but again with support capped at the Local Housing Allowance. This means that substantial public sector funds have been paid to private landlords, which the National Audit Office calculated at £9.1b a year in their 2021 Private Rented Sector report. As in urban areas, the most common policy approach to securing affordable rural housing is onsite provision from market-led development. The mechanism, known as S.106 delivery (Town and Country Planning Act 1990, as amended), secures a quota of affordable homes as a condition of planning approval. These houses are generally then owned and managed by a Registered Provider. However current policy provides that

a proposed development must comprise at least 10 houses before the s.106 quota applies, unless the settlement is as a Designated Protected Area when this can be reduced to five or fewer. However almost 70% of small rural parishes (those with populations below 3,000) are not classed as Designated Protected Areas, reducing the value of the mechanism. Almost invariably the market sites made available in rural areas are small. Anecdotally the consensus is that there is a degree of ‘gaming’ by developers to ensure that thresholds are evaded and onsite provision of affordable housing avoided. Developers also argue that there is an absence of Registered Providers willing to purchase just a few homes and/or that s.106 requirements will make schemes unviable, in their efforts to avoid providing affordable homes, instead offering to pay a commuted sum. Nonetheless most affordable rural homes come forward via the s.106 route, with 4,446 being built in 2021-22 (DLUHC – LA Statistical Return Data). However this represents only 8% of overall affordable housing delivery nationally and is considerably lower than the level of rural population, which stands at 17.6% (DEFRA Statistical digest of Rural England).

The other, more rurally focused mechanism for providing affordable housing, is the Rural Exception Site Policy which is common to most adopted local plans. Sites are permitted across the countryside, including on greenbelt, Areas of Outstanding Natural Beauty, and National Parks. The principles of the policy have remained broadly unchanged since its inception in 1988, allowing for small scale mixed tenure development on land outside of, but adjacent to existing planning boundaries – usually low-grade agricultural sites.

Rural Exception Sites are appraised based on a proven need for affordable homes locally and, as a rule, developed with a high degree of community engagement. Once planning is secured, arrangements are made to safeguard the affordability of the homes into the future and a degree of preference is given to local households when allocated. Over recent years, cross-subsidy has become more common to support the viability of rural exception developments which often have high build costs associated with design, scale, and

infrastructure. Land values are negotiated within a range that allows for a modest uplift on agricultural use but remains reasonable and supports proposals that the local planning authority consider to be viable and proportionate. Rural Exception Sites are mostly developed by Registered Providers, with 548 affordable homes built using the policy in 2021/22 (DLUHC – LA statistical return data). Along with quota sites, they are the mainstay of affordable rural housing delivery with both mechanisms key to achieving the 10% affordable housing target reintroduced by Homes England in 2020.

### Rural proofing

National rural proofing of housing and planning policy is limited and reflects the restrained role that the government’s rural agency, DEFRA, can realistically play, despite its endeavours to hold policy shapers and makers to account. The continuation of the Right to Buy policy and the sustained focus on homeownership will inevitably limit the effectiveness of any efforts at rural proofing housing policy. Some local authorities have responded to the lack of affordable homes in rural areas by devising restrictive housing allocations policies, taking advantage of freedoms within the Localism Act 2011. As with national housing policy, the extent to which local authorities rural proof housing allocations varies, with households unable to afford to live in their home rural communities ending up winners and losers depending on how policy genuinely sought to accommodate the affordability of rural living.

### Constraints on the delivery of rural affordable housing.

Despite some of these successes, overall affordable rural homes have not been delivered on anything near the necessary scale. There are three main reasons for this. The first is local opposition. Anyone hoping to build even a handful of new homes, market or affordable, in smaller rural communities is likely to face vocal and coordinated local objection. Zealous conservationism and a culture of buying into the stigma associated with affordable homes and those that live in them are often at the core of such opposition.

The second challenge is securing a site. Housing delivery favours urban and larger settlements, where strategic or bigger scale sites can better meet home building targets. Smaller rural communities are quickly written off as not sustainable locations for development or fall outside of local planning authority land-supply arrangements. As a result mainly opportunities are limited to windfall, and even these often progress slowly due to limited local authority housing and planning capacity. Enabling a Rural Exception Site is not straightforward. Success is reliant on securing a site that

- a. lends itself to building homes
- b. is agreeable to planners and
- c. has the support of a landowner willing to sell for a reasonable uplift of current use value.

The third challenge is financial viability more generally. Scheme viability is impacted by

- a. Scale
- b. extent of infrastructure necessary to connect homes to services
- c. design and build quality requirements
- d. the need for and cost of environmental mitigations
- e. the level at which rents can be afforded, public grant agreed, and loan borrowing applied.

The extent to which these variables can be applied to a development, either through policy or what is practical on the site, will impact on the willingness to invest sparse resource in schemes that show limited value for money.





# Good practice example: **Warm Spaces, Churches and Food Banks**

In the winter of 2022, amid the energy and cost of living crisis, communities found spaces to invite people inside to keep warm. In a number of our field sites 'warm spaces' were opened at churches, community centres, charities and cafes. One Church, aimed to 'provide a safe, warm space', and volunteers served soup and bread for free at lunch time, then sold refreshments and cakes afterwards. Another Church hall had a sign outside inviting people in stating 'it's ok not to be ok'. Warm spaces such as churches, libraries and charity run cafes provided spaces for people to sit and sometimes get a hot drink or meal. We also found that communities were doing a lot together to support each other through times of need, in particular through food banks and churches where people gathered for purposes way beyond food. In two areas the food banks also tried to visit rural areas with mini vans or buses to provide for remote communities.

Food bank workers often consist of retired social workers and health workers, who volunteer and offer support, advice and help to people in need, including help to complete welfare benefit applications and informal counselling. Many workers reported that the demand for food banks had doubled or tripled in their areas, in particular families with children, and that there has been stark increases in people with learning disabilities needing support as they are not reaching thresholds for social care. In one area a food bank worker told us that 'People come here to cry about childcare, housing, money, food and mental health. We get an awful lot of tears'.





## 6. Contemporary issues

### Welfare cuts and austerity

One key change over the years between Cloke et al's research published in 2002 into rural homelessness and the current conditions is the impact of the decade of austerity which followed the global financial crisis of 2009 and the election of the Coalition government in 2010. Austerity measures included restrictions in local government funding and wide-ranging cuts to benefits.

As Hoolachan et al observe, 'these reductions, along with the insecure labour market, have left some at risk of greater stress and hardship; forcing them further into poverty' (Hoolachan 2016: 76). There are several strands to welfare cuts worth noting in the context of rural poverty and rural homelessness.

- The institution of the benefit cap, designed to ensure that out of work benefits do not exceed average weekly wages, the shift to uprating benefits via by the consumer price index from the previously used retail price index and several years of below CPI increases have all had a detrimental impact on benefit levels
- Benefits for housing costs have been considerably limited as a result of Local Housing Allowances being limited to the 30<sup>th</sup> percentile of local rent levels as opposed to the median and facing year on year freezes in its value. Additional factors include the increased deductions for non-dependents, benefits limited to shared accommodation rates for under 35s and the introduction of the bedroom tax
- The introduction of Universal Credit designed to increase incentives to work and the intensification of the conditionality of benefits
- Reduction of state support for young people particularly the abolition of the Child's Trust Fund, Educational Maintenance Allowance - a means tested benefit designed to support

young people with the costs of staying on at school, and tripling student fees to £9,000.

- People who are subject to immigration control are generally prevented from accessing welfare benefits including Universal Credit and from housing assistance. This bar, known as 'No Recourse to Public Funds' was extended in 2012 and was recognised by the House of Commons Committee on Housing Communities and Local Government as a serious obstacle in responding to street homelessness post the pandemic (discussed below).

Another casualty of austerity was Supporting People. Launched in 2003, in its original form it provided a £1.8 billion ring-fenced grant to local authorities for the purpose of funding housing related support services to help vulnerable people live independently. It was used to support a wide variety of provision including refuges, care leaver support, support for people leaving institutions and support for people who have been living as homeless to set up their own home. However in 2009 the ring fence was removed from the grant which enabled local authorities to spend their Supporting People allocation as they deemed appropriate. In the 2010 Spending Review significant cuts were announced to the programme. This combined with the cuts to local authority funding set out below has had a serious impact on the provision of services that helped prevent and/or assisted those living as homeless or at risk of homelessness.

Central government funding of local authorities has fallen considerably since 2010 which explains in part why Supported People funding became diverted from housing support. The National Audit Office reported in 2018 that there had been an estimated 49.1% cut in real terms to the entire Supporting People program between 2010 – 11 and 2017 – 18 (NAO 2018). Research by WPI Economics

and St Mungo's, found that council spending on support for single homeless people specifically in England fell by 53% between 2008-9 and 2017-18, and argued this was a contributing factor to rising levels of rough sleeping in this period. In a 2018 LGA briefing it was noted that these cuts happened at the same time as growing demand for services and additional burdens have been imposed upon local government. It concludes that 'Leaving councils to pick up the bill for unfunded government policies, at the same time as managing spending reduction and such growing demand for services, is unacceptable' (LGA 2018).

Already existing problems were considerably impacted by the pandemic which had a dramatic impact upon revenue, for instance commercial income from car parks and leisure centres fell, and there were difficulties in securing rental income from commercial property. The result has been significant cuts to the discretionary services provided by local government whilst it prioritised as far as possible statutory and more acute services. A 2022 report by the Institute for Government concluded that, in the last decade,

*The scope of the state has shrunk locally, across England. Within smaller budgets, councils have had to concentrate spending on statutory and demand-led services such as homelessness, waste collection and concessionary bus passes. This came at the expense of preventative and universal services such as children's centres, subsidised bus routes and housing programmes to help vulnerable people to live independently (Atkins and Hoddinott 2022:4)*

Research by Watts et al provides a close examination of the impact of austerity on homelessness prevention services run by Newcastle city council and its partners. They observe that despite great efforts by the local authority, and an impressive track record of homelessness prevention, 'The current context is particularly pernicious in this regard, with local authority efforts to prevent homelessness directly limited by national policies that increase homelessness risk and restrict local authorities'

capacity to respond effectively to it (Watts et al 2019:144).

## Covid-19

Glass et al, in the context of a wider research project into rural lives, produced a report in 2021 on the consequences of Covid-19 and lockdown on those living in rural areas. They concluded that:

*The national lockdown that began in March 2020 delivered a huge shock to rural economies and societies, most obviously through the temporary closure of many businesses and the loss of earnings to employees, self-employed and freelance workers. These impacts reinforce the importance of diversifying rural economies that rely heavily on tourism and hospitality, and of promoting 'good work' which offers a reasonable, secure income (Glass et al 2021:2).*

Their research provides an important context to our own project. Our findings focus on the consequences of policy initiatives relating to rough sleeping and private renting.

## Everyone in

Covid-19 presented particular risks to homeless populations because of the difficulties of self-isolation in hostel accommodation, and the vulnerability of homeless populations who experience multiple morbidities and are particularly susceptible to respiratory illness (BMJ 2018). In response, at the very beginning of the first national lockdown, on 26th March 2020 the Ministry of Housing, Communities & Local Government launched its Everyone In initiative. This required local authorities to provide Covid-19 secure accommodation to rough sleepers and those at risk of rough sleeping to protect public health and control transmission. Everyone In is generally celebrated as a success. The National Audit Office estimated 33,139 people were brought into accommodation as at end of November 2020 (including those who have no recourse to public funds) and Covid-19 infections and deaths were relatively low with only 16 deaths of homeless

people identified as involving COVID-19 in the first lockdown (National Audit Office 2021). There also appears to have been a quite surprising amount of success in moving people from hotels and into settled accommodation, with an estimated 26,000 people being housed either with a private tenancy providing a minimum of six months security or by being offered supported housing or social housing.

However Everyone In raised some important issues which have long term implications for housing and homelessness policy:

- Whilst the accuracy of the numbers of people helped can be debated (LSE 2021) there is no doubt that the scale of rough sleeping and those at risk of rough sleeping is much greater than the government had previously estimated.
- There was an increase in first time people sleeping rough during the pandemic probably as a result of people being evicted from lodgings or sofa surfing because of lockdown and those people who lost their jobs because of the pandemic and who therefore could no longer afford housing. Whilst it was anticipated that this increase would be temporary, the cost-of-living crisis (see below) that followed the pandemic suggests that the problems may be more long term.
- Dealing with people who have No Recourse to Public Funds has proved problematic. The first iteration of Everyone In explicitly included those with no recourse to public funds, but moving people who have no recourse to public funds into settled accommodation is problematic because they cannot claim benefits and are likely to struggle financially to move into the private rental. The House of Commons HCLG Committee concluded that 'No recourse to public funds has been an obstacle to reducing rough sleeping for a long time: the pandemic has just shone a spotlight on its impact. If the Government is serious about meeting its manifesto commitment to end rough sleeping by 2024, it must reform the no recourse to public funds policy'

(HCLG 2021)

- Shortage of affordable housing is an inevitable blocker in finding move on accommodation.

The Public Accounts Committee, in a report published in March 2021, whilst noting the remarkable success of Everyone In in limiting infection transmission and deaths among a very vulnerable population, concluded that

*This initiative has also exposed gaps in the Department's approach to tackling rough sleeping. The Department has a target to end rough sleeping by May 2024, but does not have a strategy for achieving this outcome or maintaining it once met; nor does it have a clear understanding of how it will measure and report on progress. The scale of effort required to achieve this target may also be greater than previously suggested: the number of people accommodated in the first ten months of Everyone In (37,430) was nearly nine times the number of rough sleepers recorded in the Department's last official snapshot before the start of the pandemic (4,266). This also raises further questions about whether the Department's funding of local authorities to achieve its objectives is adequate and sufficiently long-term*

For our professional interviewees responding to Covid 19 was a watershed experience.

'I suppose what Covid has done is demonstrate that if you throw money at the problem, homelessness can be resolved, because that's the issue.' (Support Worker,)

During Everyone In, some support workers found that without 'tolerance' and understanding that came through spending time with people and wrap around care, it was impossible to keep people safe. The usual policies around the behaviour in temporary and supported accommodation were too tricky for people to adhere to, particularly when service users had complex needs and were not used to living in their newly granted accommodation due to long periods of time spent sleeping rough. It was only through tolerance and

understanding, perhaps more afforded during the unfamiliar period of the pandemic, that support workers were able to maintain people in their accommodation.

*‘There’s only a certain amount of time we can actually dedicate to that and support we can put in place. And that’s been my argument, is we’re – we’ve done great throughout Covid. And we’ve housed a lot of people who’ve never been housed before. But if we don’t keep them in their accommodation, all of that doesn’t matter...and some of that actually requires almost that you go and live with them and be their buddy’*

*I think we’re tolerant because we understand the big picture of all of the things that go on around them. We don’t look at them in isolation... we see all the other services that are involved. So we understand the big picture...it makes us more tolerant, because we really know the whole thing. We’re not just seeing that person in isolation as a housing officer’ (Support Worker)*

### Private renters

It was not just those who were sleeping rough who were impacted by Covid-19. People renting in the private rented sector were also vulnerable because of their limited security of tenure. In most cases, outside of the initial six-month period or where there are fixed term agreements, private sector landlords can evict someone providing them with only two months’ notice. Lockdown and furlough inevitably placed private renters at a high risk of eviction. However, Robert Jenrick’s pledge on twitter that, “no one should lose their home as a result of the coronavirus epidemic” gave a strong indication that private renters would get protection<sup>4</sup>. What the government did was to ban evictions except in specific cases during the pandemic period. The exact details of the eviction ban differed at different stages of the pandemic. The Housing Communities and Local Government Committee in its review of the eviction ban noted housing lawyers’ criticism of the complexity of the legal adjustments (HCLG 2021:23). It recorded

evidence from Giles Peaker, Partner at Anthony Gold Solicitors, who criticised the ‘hotchpotch of interventions and last-minute secondary legislation that is very hard for anyone to grasp’. What particularly concerns housing advisers is that there is nothing in place to help renters who built up arrears during lockdown. This may well mean that there will be an increase in homelessness in the near future as private renters cannot afford to reduce their arrears. As Simon Mullings, representing the Housing Law Practitioners’ Association (HLPAs), pointed out to the HCLG, there is a lack of “long-term strategy about how to protect the sector”.

### The cost of living crisis

The cost of living crisis has rapidly succeeded the pandemic as a significant risk factor in homelessness. For a number of reasons, most particularly the war in Ukraine which has caused energy and grain shortages, inflation is high and there has been a rapid increase in the prices of basic commodities (ONS 2023). Rural households may be more affected by current price rises than other regions because of rural vulnerability to high fuel costs, high food prices and high transport costs, all of which we have discussed above. The Rural Services Network, which commissioned research into the differential cost of living between rural and urban areas (Rural Services Network 2022) is now collecting data from rural residents about the impact of the cost of living crisis on them. [Suffering from the rural cost of living? Make your thoughts known in household survey - Rural Services Network \(rsnonline.org.uk\)](https://www.rsnonline.org.uk). We expect the results of the survey to confirm that rural households are significantly more impacted than urban households.

### Adult social care

Adult social care faced a number of problems prior to the pandemic. Over the decade between 2010 and 2020 research by the Kings Fund identified that the key problems comprised means testing, catastrophic costs, unmet need, poor quality of care, workforce pay and conditions, market fragility,

<sup>4</sup> Robert Jenrick on Twitter: “Thank you @Shelter - no one should lose their home as a result of the #coronavirus epidemic.” / Twitter

disjointed care and the postcode lottery and argues that they have all been exacerbated by Covid-19 (The Kings Fund 2020). Since the pandemic there are particular problems around unmet need and there is no long term solution proposed to the staffing crisis in adult social care. There appears to be little data on particular problems of Adult Social Care in rural areas, although it is established that the demographic in rural areas is older, which means that care needs are more likely (Skinner et al 2021). Shucksmith et al suggest that in rural areas adult social care is placed under particular strain due to the 'greater distances that care workers need to travel, staff shortages and the higher costs of formal provision at home' (Shucksmith et al 2021:18).

During our research we spoke with social workers in rural areas where they explained that the system is at the brink of collapse, and they can only provide support to the absolutely most acute cases. Many of their clients do not meet the threshold requirements for adult social care and therefore the demands on NGOs and local organisations to support people at risk of or experiencing homelessness who have complex needs is far greater. People working in rural food banks told us that those accessing their services had social care needs far beyond the need for food. Many provided emotional and wellbeing support, and many reported undiagnosed or unsupported mental health needs. In one location a retired social worker unofficially supported people with care needs through the food bank on a weekly basis as a volunteer.

### Brexit and migration

In 2018 Crisis and Homeless Link commissioned a report on the potential impact of Brexit on homelessness as a policy area. The report makes several important points; 'The underlying causes and the harm caused by homelessness do not distinguish by nationality, so nor should support for people at risk of homelessness and identified the risk that EU nationals, particularly those who are homeless may fail to apply for settled status or temporary residence permits. It identifies several risk factors, for people failing to

apply, it could be because 'they are unaware of the need to do so, fear being rejected, are mistrustful of interacting with officials, or are unable to afford the fee (no more than the cost of a UK passport – currently up to £85 – a significant sum for those on low or no income). The fact that the application process is expected to be solely available online may also prove a barrier for EU nationals that are homeless with no internet access or low computer literacy'.

Our findings revealed an increase in migrants within the homeless population. In one area the local authority noted an increase of European migrants who were now sleeping rough as they did not gain settled status following Brexit, and consequently do not have recourse to public funds. A housing and homelessness manager from another local authority told us that, 'The EU/Brexit legislation and the Citizen's Rights Act has changed the way that we deal with EU migration. So there are people now who are finding themselves destitute for brand new reasons. It's kind of that we've never had to deal with before, so it has made things more complicated'. Some of our respondents also raised concerns regarding increases to the number of people from Ukraine displaced by the war whose temporary housing with British families has come to an end. Organisations and local authorities across the country are now warning that there may be a drastic increase in migrant populations at risk of homelessness.



## Case Study **David**

David\*, a 47-year-old man with a replacement hip and severe mental health issues, described how he felt ashamed to use a food bank, whilst also receiving social welfare benefits. He had to spend most of his benefits that month on a new pair of glasses so he could see, as his eyesight was so bad he had taken a few falls. He had disagreements with his mother whose house he had been staying in and now he was sleeping rough with only £20 left for the month. He explained that the price of food was going up in the supermarkets and the money wasn't going far so he went to the food bank. He explained his desperation:

'It was my eyes or my health...I just said I'm with a doctor and everything now

and the doctors that want to refer me to the mental health and things like that because I've tried to commit suicide '

He was able to receive food packages from the food bank and was regularly checked on by one of their volunteers. However, he described how he wasn't eating enough and his stomach was swollen. The doctors had sent him to the hospital to check for bowel cancer, but he didn't have the money to get the train to the hospital, so he would have to jump the fare, which he didn't like to do. David expressed guilt and shame for using the food bank, having no choice but to spend his benefits on new glasses, and the thought of having to jump the train.

\* Names have been changed to protect people's identities.

## 7. Emerging Themes

### Inequalities, intersectionality and social injustice

In this section we draw together some of the key themes that have emerged from this research and make suggestions for future research priorities.

The themes that we would like to emphasise are:

- Inequalities in rural areas may not be obvious to the casual visitor or the resident who works elsewhere but they are deeply embedded, have been exacerbated in recent years and place rural residents for whom home ownership is out of reach at serious risk of homelessness.
- The intersections of disadvantage and vulnerability with rurality intensifies the risk of homelessness and makes homelessness much more difficult to respond to
- Whilst homelessness in rural and urban areas are distinct problems there is significant movement between the rural and the urban and a clear interdependence between the rural and the urban which suggests there are policy implications and opportunities for innovation
- Whilst there is clear evidence in our research of the individual resilience of those experiencing homelessness there is a particular shame and stigma attached to being homeless in areas of affluence which can intensify the barriers to support.
- Rural homelessness and the precariousness of rural housing provides a useful lens for us to understand inequalities and social injustice more generally

#### Inequalities

Our review of the literature and our field work has demonstrated the embeddedness of rural poverty despite its invisibility. Traditional employment in rural areas is poorly paid and often seasonal. More well paid employment is difficult to access

because of limited transport options. There are also limited educational and training opportunities. The literature also discusses the rural premium, the additional costs that those who are resident in rural areas face, such as higher energy costs and more expensive fuel and food costs. Housing is a particular source of rural inequality. House prices are unaffordable for those who are working locally who face competition for housing with those who commute for work to rural areas as well as competing with those who buy houses as second or holiday homes. As a result of the reduced supply and high demand rents are high. Yet rural poverty is invisible because many people living in rural areas have high incomes from working elsewhere. The problem of rural poverty has been exacerbated by welfare cuts and by cuts to local government funding. Local government has responded by cutting funding for discretionary services, yet these are the services that sustain rural populations and their absence has been acutely felt.

The pandemic hit rural economies hard, and the cost of living crisis appears to be having a particularly deleterious impact. So the rural poor are in jeopardy and our research shows that this has contributed to the increase in rural homelessness. Whilst homelessness is often the consequence of poverty and structural disadvantage there can be multiple compounding factors. The interface of these factors is described as intersectionality and is discussed below.

#### Intersectional disadvantage

Our research has shown that within homelessness provision in rural areas, there is a lack of services for groups who are known to be more likely to experience homelessness. For example, there is inadequate provision for people who identify as LGBTQ+ (Tunaker 2023), those from ethnic minority backgrounds (Bramley 2022), people with disabilities (Housing Rights Watch 2018) and migrant populations (Bramley et al 2021). Specialist support is most likely to be located in



## Case Study **John**

John\* is 27 years old and has been rough sleeping for 3 months. He is currently sleeping in a tent on private land. He is type 1 diabetic and insulin dependent, and he has incontinence issues as a result of diabetes. He needs to keep his diabetes medication in a fridge and he has mental health issues as a result of his diabetes and rough sleeping, so he requires specialist mental health support. The local authority goes out to see him regularly and offers support, but he does not want to take up offers of support that are too far from his own local area. He does not feel confident to travel far distances due to his incontinence and being too far away from his support network.

He gets fresh water and use of a fridge from the landowner whose land he is sleeping on and buys food from a local shop but this is expensive and takes up a lot of his benefit payments. His outreach worker has explained to us that John's situation is challenging as John's own needs to stay local and familiar to his area, as well as his need for a self

contained home/flat, along with his age reducing his eligibility for higher rates of housing benefit mean he is excluded for a longer period of time as the system is set up such that out of area placements for temporary accommodation are deemed as appropriate despite his clear need to stay as close to the local area as possible. His outreach worker has explained that medical professionals are very concerned for his wellbeing as his ability to manage his health in a rural location are reduced without access to affordable transport.

His outreach worker was able to negotiate temporary accommodation centrally in the end and a private landlord sourced appropriate accommodation - the local authority covered any shortfall in rent and John's benefits were maximised so he could afford the diet he requires and became eligible for higher rent benefits as a result of receiving Personal Independence Payments (PIP). His outreach worker also managed to apply for a free bus pass based on his disability.

\* Names have been changed to protect people's identities.



urban centres, which in some cases means several hours journey from a rural location. This makes minorities even more vulnerable in rural areas, and less likely to seek or acquire appropriate support. As one of our survey respondents explained:

*“As a mainly rural area we do not have access to many of the services that urban areas have. Decreasing funding tends to centralise provision in urban areas.”*

Nearly 16% of our survey respondents highlighted that mental health support services are missing in their area. 28% of our respondents also noted that what they need in order to tackle homelessness in their area, aside from affordable housing and more homelessness services, is increased funding for prevention services.

Another respondent said:

*“Urban areas tend to have a network of agencies working closely within a close proximity to provide the support required across a range of issues. This is much more difficult to achieve in rural settings due to the area it would have to cover and the difference in population density”.*

Another summarised the issues in rural areas compared to urban as follows:

*“Less specialist support for addiction and mental health crisis. Little or no supported accommodation. Little or no 16/17 year old accommodation. Public transport makes accessing work, health and support services expensive”.*

The Covid-19 pandemic revealed existing ‘multiple and interrelating structures of inequality’ (Maestriperi 2021: 1) that together make some people more susceptible to homelessness than others. Homelessness prevention needs to focus on groups that are likely to experience marginalisation, microaggressions and discrimination in society. Unfortunately, these groups are least likely to find specialist support in rural areas. Our research respondents have also

highlighted the specific needs and concerns of the Gypsy/Traveller communities who experience marginalisation and multiple discriminations (Greenfields 2017 Richardson and Codona 2016)). The 2002 Homelessness Act requires each local authority to consider the needs of Gypsy/Traveller community in its homelessness prevention strategy. However, according to many of our respondents in rural areas, this community remains at high risk of homelessness and lacks support.

Our research suggests that problems faced by the elderly and the young are exacerbated in rural areas. It also highlighted that women’s homelessness is an increasing demographic within rough sleeping, often linked to domestic violence and abuse (see Bretherton and Pleace 2018). In rural areas women are likely to be even more invisible/hidden, and less likely to find the support they need. 7% of our survey respondents suggested that domestic violence and abuse is one of the three main drivers for the increase in homelessness in their area.

### The rural and the urban

This research is highlighting the causes, the responses to and experiences of rural homelessness. There are three points we wish to make here. First in no way are we suggesting that there should be competition between the rural and urban for scarce resources. Our point is that policy makers have overlooked rural homelessness because of its invisibility and it needs to be recognised as a significant and distinct social problem. Second, we understand that urban and rural homelessness are connected in a multiplicity of ways, not least because there is a movement of those experiencing homelessness and housing precarity from the rural to the urban and vice versa. We did not have the resources in this project to document those journeys but we consider them important from a policy perspective. We would also encourage innovative partnerships and the sharing of good practice between urban and rural services to respond more generally to homelessness. Finally the failure to recognise rural homelessness as an issue demonstrates a failure to understand the characteristics and consequences of rural poverty and rural housing precarity which in turn increases

the risks of experiencing homelessness in rural areas.

### Shame and stigma

One particular characteristic of rural homelessness that our research revealed is that those experiencing homelessness or who are at risk of homelessness feel ashamed and stigmatised by their position. The shame and stigma of being homeless or at risk of homelessness in rural areas adds to the problems of accessing services. It certainly contributes to the invisibility of homelessness in rural areas. It is also likely to exacerbate the trauma that people experiencing homelessness suffer. The relationship between trauma and homelessness is fully discussed in the literature (see for instance Maguire et al 2009, Someville 2013, Woodhall-Melnik, et al 2018).

Several people who have experienced or are experiencing homelessness told us that they tried to hide themselves away from scrutiny. Stigmatisation was experienced as people not caring. As one respondent said:

*“They don’t care to tell you the truth, as long as they can go home to a warm loving home and things like that and, you know, have a cooked meal and all that, they don’t care about the people what lives on the streets”.*

Behaviour often went beyond stigmatisation. Some of our respondents were assaulted whilst they slept on the streets. In general people reported that understanding and compassion were much more common in urban areas; people would buy food and check up on people sleeping rough and in general were experienced as more generous.

### Housing and homelessness as a lens on rural inequality

The final theme we wish to identify in this research is that looking at rural homelessness and the experiences of those at risk of homelessness, we learn as much about inequalities in rural society as we do about rural homelessness itself. We live in a society where home ownership is the marker of social inclusion. In rural areas those who cannot afford to own homes are doubly excluded.

They have failed to conform to the rural norm of home ownership and they are highly unlikely to be able to afford to rent secure and decent accommodation or be given social housing. What our research shows is that rural inequalities are increasing rapidly, this not only increases the risk of rural homelessness but also may lead to social destabilisation. The causes of rural homelessness and the scale and effectiveness of interventions need to be investigated urgently to avoid any further escalation of inequalities, social injustices and social exclusion.

### Further research

This was a small scale research project which, whilst we made important findings about the increasing prevalence of rural homelessness and rural housing precarity, also revealed the need for further research particularly in the following fields

- Housing affordability and housing economies in rural areas including community attitudes to new affordable housing developments
- Rural poverty following Covid 19 and the cost of living crisis
- The impact of the criminalisation of behaviours associated with homelessness
- Urban/rural trajectories of homelessness and precarious housing
- Community responses to homelessness, precarious housing and rural poverty
- The role of pets in the lives of rural people at risk of or experiencing homelessness

## 8. Recommendations

- The rise in rural homelessness is a strong indicator of rural deprivation. We need more information about its scale and distribution. As part of levelling-up there needs to be a renewed political commitment to ending all homelessness including rural homelessness and other hidden forms of homelessness. Part of that commitment must be an acknowledgement of the 'rural premium' which is unaffordable for the rural poor and places them at risk of homelessness.
- There is a sharp divide between the housing that is available in rural areas and the housing that is needed. Genuinely affordable housing must be a priority for rural areas. It is time for a radical rethink of what it means for housing to be affordable, and how affordable housing is provided in rural areas.
- Local Housing Allowances do not work in rural areas. Support for rental costs has to be more targeted and the government must be confident that huge sections of the rural population are not priced out of housing. Move-on accommodation must be available and affordable. Saving money on housing allowances is short sighted as the long term costs of homelessness are very high.
- There needs to be a long term commitment to providing flexible, multi-disciplinary prevention services in rural areas. Mental health services are a priority. Joined up thinking and innovation must be encouraged through pilot projects, mobile services and one-stop shops. The successes of Supporting People prior to 2009 needs to be evaluated and what worked best in those early years of Supporting People replicated.
- Local networks, local knowledge and the experience, commitment and innovation of local government, third sector and informal and community providers need to be mined for workable solutions.
- Waiting for those experiencing rural homelessness to contact services is not good enough. Providers need to understand and eliminate the barriers people have in accessing their services and be proactive in reaching out to those in need.
- The provision of sustainable, reliable and affordable public transport links between rural and urban areas and market towns must be a priority. Effective public transport would reduce costs on service provision as it would be easier for people to access those services, and will help sustain employment.
- Listening to those who are experiencing, have experienced or are at risk of experiencing homelessness in rural areas - those experiences provide vital underpinnings to effective policy making

## Good practice example: **Housing with Employment and Wrap Around Care**

Amongst people we interviewed who had experienced homelessness, and housing professionals, there was a strong desire for sustainable long term housing solutions that provided 'more than just a roof over the head'. A number of those who had experienced homelessness emphasised the positive aspects of wrap-around care they had received and the desire for meaningful activities for those in supported or temporary accommodation, alongside a supportive community of people they could trust.

Emmaus in Cambridgeshire is a self sufficient social enterprise which is part of a larger network in the UK. The site offers long term accommodation

to people who are experiencing homelessness alongside full time work in its recycling warehouse, gardens and shop. Those that join, referred to as 'companions', work alongside volunteers and staff and are involved in jobs that range from sorting books or textiles, fixing and delivering furniture, repairing computers and tech equipment to be resold, growing produce in the garden or making and sorting things to sell in the shop and cafe. The organisation operates on the principle of 'solidarity' and provides access to services such as mental health support and employment training opportunities.





## 9. Acknowledgements

We would first and foremost like to dedicate this report to people who are currently experiencing homelessness in all forms in the UK, particularly in the countryside, and to those who work tirelessly to support them. We hope that this report can bring about much needed change. Thank you to everyone who gave their time and expertise, whilst experiencing hardship and rural homelessness.

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# 10. Appendices

## Appendix A - List of Steering Group Members

The research has been commissioned by a rural homelessness task force co-chaired by Martin Collett and Rory Weal, bringing together experts from organisations listed below.

[English Rural Housing Association](#)

[CPRE The countryside charity](#)

[National Housing Federation](#)

[Homeless Link](#)

[Hastoe Housing Association](#)

[Action with Communities in Rural England \(ACRE\)](#)

[The Rural Services Network](#)

[Citizen Housing](#)

[Trent and Dove Housing](#)

[The Rural Housing Alliance](#)

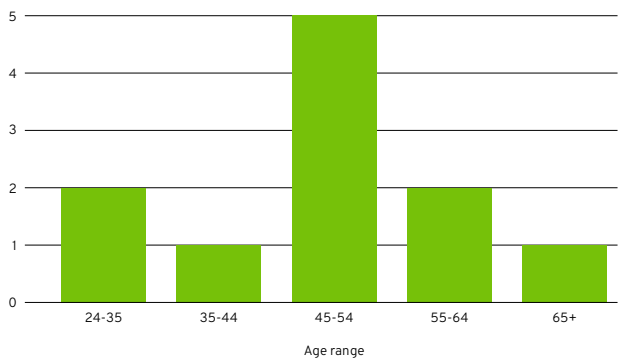
Church of England Public Policy Team

Susan Eastoe

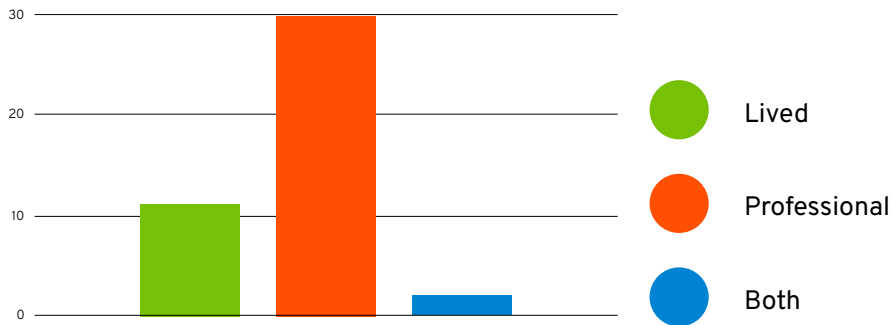
Jo Richardson, Prof. of Housing & Social Inclusion, DMU, Leicester

# Appendix B - Interviewees in Ethnographic Research

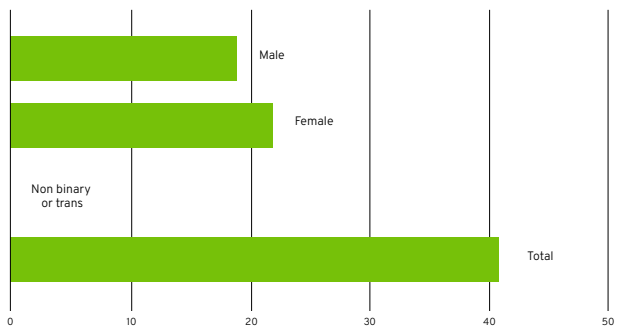
## Interviewees with lived experience of homelessness



## Interviewees with lived experience of homelessness



## Total Interviewees



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Dr Carin Tunaker, Professor Helen Carr and Dr Laura Burke with Dr Guillermo Reyes-Pascal

Report design by Harriet Lyall

# SUSTAINABLE COMMUNITIES: THE ROLE OF HOUSING IN STRENGTHENING THE RURAL ECONOMY





# Sustainable Communities: the role of housing in strengthening the rural economy

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# Sustainable Communities: the role of housing in strengthening the rural economy

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# 1. Introduction

According to Defra figures, the rural economy is 18% less productive than the national average. Closing this gap would add up to £43bn to the economy in England alone, implying the creation of hundreds of thousands of good jobs and a very positive knock-on impact on the viability of small towns and villages as places to live. To achieve this, a number of measures are necessary, including investment in skills and digital and electrical infrastructure, wholesale planning reform – and a renewed focus on housing.

Rural communities in England and Wales continue to face a number of distinct challenges compared to their urban counterparts: a population ageing at a faster rate, proportionally fewer affordable homes, pressure on house prices from second home ownership and a larger gap between house prices and wages.

These challenges are largely the result of a planning system which is not fit for purpose for rural development. The system continues to favour large-scale developments that so often fundamentally and negatively alter the fabric of the local community. Likewise, this same system ignores the advantages of small-scale developments that would improve the viability of small, rural villages. These communities, often disregarded as unsustainable villages in local plans, are thus denied the opportunity to improve their sustainability.

The lack of available and affordable homes in rural areas has resulted in young people having to move to urban areas, which not only has a knock-on effect for local employers but has led to the reduction of key rural services and amenities, such as public transport, banks, schools, and pubs which continues to hold back the economies in rural areas. This systemic failure of government planning policy is steadily killing rural communities.

Whilst Covid-19 was devastating for so many people and businesses, the increasing demand for rural homes and changes in societal patterns present new opportunities for rural areas. If rural areas are able to grow in order to meet the increasing demand, as well as accommodate the existing need, then communities, economies, and the environment in rural areas could be transformed.

This CLA report, *Sustainable Communities: the role of housing in strengthening the rural economy*, looks at the opportunities and challenges facing rural communities in a post-pandemic England and Wales, highlighting the importance for organic, incremental growth in rural areas. The recommendations set out in this publication are critical for rural renewal, for levelling up the economy and for diverse, sustainable, and resilient communities.

## **Mark Tufnell**

President

Country Land and Business Association (CLA)

## **CLA recommendations**

In order to create sustainable communities and strengthen the rural economy through housing, the CLA believes the following actions are necessary.

- 1 The National Planning Policy Framework (NPPF) must return to a policy which promotes organic incremental growth in settlements of fewer than 3,000 inhabitants, which would lead to a small number of houses in a larger number of villages.
- 2 Local authority sustainability assessments should be reformed, to place greater emphasis on digital connectivity in recognition of the services that can be accessed online; and to assess which services could be supported if development were enabled.
- 3 Local planning authorities should be mandated to undertake a housing needs assessment across all rural settlements without a housing allocation so that identified local need can be met at a local level.
- 4 Permitted development rights should be introduced for new-build affordable housing for discounted rent on rural exception sites.
- 5 Conditional exemption from inheritance tax should be expanded to affordable rented housing for the period the homes remain let as such.

## 2. The rural housing crisis

In many rural areas, housing has become divorced from local people and their incomes, with the market being driven by second homeowners and retirees. The pressure has become more acute since the start of the Covid-19 pandemic, with a surge in the number of rural properties being used for holiday lettings, owing to restrictions on international travel and with more people looking to move from towns and cities due to an increase in home working. With demand continuing to outstrip supply, rural house prices continue to rise and, as a result, local people are often priced out of home ownership and rely on the rental market.

However, there is a severe shortage of rural affordable homes, and this puts additional pressure on the private rented sector, which now supports double the number of low-income families than it did twenty years ago.<sup>1</sup> CLA members recognise the importance of affordable homes to their community: 60% of respondents to a recent member survey let homes below market rent, with 24% of all homes let below market rent, to help people live near to where they work and to enable younger people to remain living in their community. Our members are, in effect, taking on the role of a social landlord when the provision of social housing should be through the social sector rather than the private sector, and this is a clear market failure.

The pricing out of the younger generation has resulted in rural areas ageing faster than other parts of the country, yet with the least provision of suitable homes for the elderly. The loss of young people and full-time occupiers in rural areas continues to contribute to the closure and loss of key services and amenities, which will only be exacerbated by the pandemic.

For rural areas to thrive, there needs to be an adequate, available, and diverse supply of homes, which includes different tenure types of varying sizes. The existing lack of homes in rural areas prevents young families to continue living in their community, key workers to be based near to their places of work and the elderly to downsize.

### Key Statistics



In 2019, the average house price was 8.6 times the average earnings in rural areas compared to 7.4 times in urban areas, excluding London. In some rural areas, the ratio is over ten times.\*

\* DEFRA, [Statistical Digest of Rural England 2021](#)



In 2019, private rent accounted for more than 35% of many key workers' post-tax income in over nine out of ten rural areas, making them unaffordable.\*

\* CPRE, [Homes for heroes: affordable housing for rural key workers](#)



In 2020, there were over 260,000 people on a housing waiting list in rural areas\* and fewer than 4,500 social homes were built in rural areas in 2019-20.\*\*

\* Gov.uk, [Live Table 600: Numbers of households on local authorities' housing waiting lists by district: England, 31 March 1987-2021](#)

\*\* Gov.uk, [Table 1011: additional affordable housing supply, detailed breakdown by local authority](#)



The number of families classified as homeless in rural towns and villages across England has increased by 85% between 2018 and 2019.\*

\* CPRE, [Social housing waiting lists grow for over half of rural councils](#)



In 2019, only 9% of rural dwellings were affordable compared to 19% of urban dwellings.\*

\* Gov.uk, [Digest supplementary data tables, rural living](#)



In 2019, 25% of the rural population was aged over 65 compared to 17% of the urban population.\*

\* Affordable Housing Commission, [A National Housing Conversion Fund](#)



From 2012-17, 52 rural schools shut their doors to pupils, roughly one a month, and post offices closed at a similar rate. Between March 2013 and December 2016 1,365 rural pubs closed, that's seven pubs a week.\*

\* DEFRA, [Statistical Digest of Rural England 2021](#)

1. Affordable Housing Commission, [A National Housing Conversion Fund](#), 2020

## 3. An unsupportive planning system

### 3.1 Sustainable communities

Sustainable communities are places where people want to live and work, now and in the future. They meet social needs, promote economic success, and protect and enhance the environment. Communities must have the opportunity to grow and develop in order to continue to be sustainable. The Taylor Review (2008) sums it up well with its emphasis on “action, not just maintaining the status quo, and it’s about more than just the environment, it has to address environmental, social and economic issues together.”<sup>2</sup>

However, local plan policies continue to overlook the need for proportional development in smaller rural settlements. In 2017, the CLA’s report: *Sustainable Villages* found that more than 2,000 villages across England and Wales were deemed to be unsustainable due to a lack of public services.

This is an outcome of local authorities undertaking sustainability assessments and placing settlements in a hierarchy according to their services. Housing is then allocated to those towards the top of the hierarchy, such as in market towns and large villages, ignoring the needs of smaller villages and hamlets and perpetuating a vicious cycle.

A sustainability assessment is based on a list of services which the local authority believes are necessary for a community to thrive. Most local authorities include a post office, primary school, food shop, GP, village hall, pub, and bus service in their assessment. However, far fewer include broadband when determining the sustainability of a settlement, ignoring the changing role technology will continue to play in rural areas. Using antiquated methodology to measure the viability of an area is flawed and needs reform.

The assumption that a lack of services means that smaller rural communities are unsustainable for new homes is damaging, actively diminishing the sustainability of these settlements. If sustainability was at the heart of planning decision-making, then these settlements would be able to grow to meet social needs, promote economic success and protect and enhance environmental objectives.

Rather than local authorities assessing rural settlements on what services they do not have, especially when so many have been lost, **settlements should be assessed on what services could be supported if development were enabled in addition to taking greater account of digital connectivity.** The shift in emphasis to support incremental, organic growth in smaller rural settlements is fundamental for the survival of rural communities.

Making it easier to build homes in rural areas does not mean concreting over the countryside and destroying communities but preserving the identity of communities by incrementally adding homes through small-scale development. The fact that many communities find themselves battling large-scale developments underscores the lack of sustainable development in the past which has left rural areas behind and directly contributed to the situation today. Unsustainable villages are entirely a failure of government planning policy, and it does not have to be this way.

### 3.2 Rural housing need

Local planning authorities are required to calculate the housing need for their authority and ensure that they have a five-year land supply. As outlined above, sites are allocated towards the top of the hierarchy, resulting in significant expansions to market towns and larger villages, and little opportunity for smaller settlements. Once again, the methodology consistently puts rural areas at a disadvantage, and reiterates how unfit for purpose the planning system is.

2. Taylor Review, 2008

To ensure that the housing needs of rural communities are met within the community, **local planning authorities should be required to conduct housing needs assessments in settlements not allocated housing in their local plans.** This will not only enable housing to be delivered within the settlement where it is needed, but will allow for the size, type, and tenure to be identified.

This is particularly important for rural communities that have an ageing population, but where homes are less likely to be adapted for the elderly<sup>3</sup> and are more likely to be larger, older, and detached than urban homes.<sup>4</sup> The lack of suitable homes for the elderly prevents those who would like to scale down to a more manageable property from doing so, as they would not be able to remain in their community, often where their family and support network are.

### 3.3 Rural exception sites

Rural exception sites are a very important mechanism for delivering affordable rural homes on land which would otherwise not gain planning permission. However, the rural exception site policy continues to be underutilised due to high upfront costs for the landowner including professional fees and surveys, uncertainty with the planning system, a risk of right to buy, local perceptions and the inheritance tax burden if the landowner wants to retain and manage the affordable rented provision in-house.

To mitigate the uncertainty of the planning system and encourage more rural exception sites to be brought forward, **permitted development rights for new-build affordable housing for discounted rent on rural exception sites should be introduced.** This would enable a rural landowner to have the principle of development agreed before incurring significant costs and taking on a disproportionate risk.

Rented property is currently considered an investment asset and included when calculating the value of the estate for inheritance tax purposes. Rural landowners are unlikely to want to invest in building new affordable homes if it increases the inheritance tax faced by their families when financial returns are only likely to be marginal. **A conditional exemption from inheritance tax for affordable housing for the period they remain let at affordable rent should be introduced** to encourage landowners to bring forward land for affordable homes whilst giving the option to retain and manage the homes in-house.

3. APPG: [Rural Housing for an Ageing Population: Preserving Independence](#)

4. English Housing Survey, Live Tables 2019

## 4. Rural housing in a post-pandemic England and Wales

### 4.1 Rural communities and Covid-19

For many, Covid-19 has fundamentally transformed the value of home and community. Whether it be the home's ability to transform into a classroom, offer a space to work remotely from, or provide a sanctuary to stay safe during the global pandemic, home has never been more important. The pandemic has also shone a light on the importance of community, with recent research showing that the pandemic has helped to reignite people's interest in their local community and sparked a desire to be more involved.<sup>5</sup>

Multiple lockdowns brought into focus people's living arrangements, such as no or inadequate gardens, overcrowding in the city and distance from those in their communities. As well as access to outdoor space and cleaner air, homes in rural areas are on average 38% larger than homes in urban areas and are therefore often better at meeting the needs of families and working remotely.<sup>6</sup>

This has resulted in a surge of interest in rural homes. A survey commissioned by the CLA of over 1,000 Londoners found that 44% of respondents were more likely to consider moving to the countryside as a result of the pandemic versus just 9% saying the contrary. People aged 18-34 are most likely to consider moving to the countryside, at 55% compared to 38% of people aged 35+. These young people could help revitalise the rural economy, if suitable housing were available.

Although the average rural house price has continued to rise, the strong demand is best illustrated by an increase in value of over 14% for rural homes in England and Wales between May 2020-21, compared to an increase of just under 7% in urban areas<sup>7</sup>, with Savills predicting continued growth.<sup>8</sup>

Research shows that over the next decade, an additional 124,000 households are expected to move to rural areas, three times the current annual new build rate.<sup>9</sup>

### 4.2 The opportunity

The increase in urban to rural migration is a huge opportunity. The movement of young people to the countryside would be a welcome reversal and could be fundamental in improving economic success, the health of communities and environmental stewardship in rural areas.

The rural economy is as diverse as the urban economy, supporting over 250 different business types. 17% of the population live in rural areas, whereas 24% of all registered businesses operate there. However, there is still an 18% productivity gap between urban and rural areas which, if closed, would add £43bn to the national economy, showing how much potential there is in the rural economy.

There is a close interaction between economy, community, and environment in rural areas. However, the planning system continues to be a barrier for appropriate and much-needed development in the countryside in the misplaced belief that this supports communities and the environment.

Environmentally good land management produces a valuable backdrop for inward investment and tourism, but that management will only work on the back of the profitable use of land and buildings. Housing and economic development are interdependent and vital for rural areas to grow and prosper in a sustainable way.

5. The National Lottery Community Fund, [2021: importance of communities set to remain high as people identify loneliness and isolation as a key issue to tackle in their local area](#)

6. English Housing Survey, Stock Profile, live tables 2018

7. Hamptons, [Rural price growth twice the urban average](#) June 2021

8. Savills, [Mainstream Residential Property Forecasts 2021](#)

9. CPRE, [Rural Recovery and Revitalisation](#) October 2020



If rural areas are able to meet the existing need but also the growing demand for homes, then more diverse, resilient, and sustainable communities would emerge, helping close the 18% productivity gap and unleashing the potential of the rural economy.

### **4.3 The challenge**

If rural areas are not able to grow, the disparity between the supply of homes and the demand of homes will worsen, leading to an even greater affordability crisis. House prices will rise, continuing to price out local people – particularly the younger generation – who want to live and work where they grew up; increasing the need to either travel for work in rural areas (sometimes from urban areas); and increasing the migration to urban areas to work and live, whilst the availability and affordability of rented homes will continue to be stretched.

The short-term movement of younger people from cities to the countryside as a result of the pandemic must be capitalised on in the long term. This means that it is critical for rural areas to have the facilities, infrastructure, services, and amenities the younger generation want so they continue to stay in the countryside past the pandemic.

It is essential for rural areas to be digitally connected. 85% of working adults want to use a hybrid approach of home and office working in future and a recent poll showed that 82% of 1,500 UK business owners are considering changing future working practices to allow more staff to work from home as a result of the Covid-19 pandemic.<sup>10</sup> In addition to remote working, digital connectivity reduces isolation and opens up access to services like banking, shopping, education, healthcare, communication, employment, and entertainment services.

10. Gartner, [Gartner Survey Reveals 82% of Company Leaders Plan to Allow Employees to Work Remotely Some of the Time, 2020](#)

## 5. CLA recommendations

The CLA's Rural Powerhouse campaign aims to unleash the potential of the rural economy by closing the rural productivity gap and transforming the lives of millions of people who live and work in the countryside.

The second theme of the campaign is “a planning system designed for rural communities” which calls for a simpler and properly resourced planning system to support, enable and enhance development in rural areas.

### 5.1 Incremental housing growth

The National Planning Policy Framework (NPPF) must return to a policy which promotes organic, incremental growth in settlements of fewer than 3,000 inhabitants.

Planning policy should promote the organic, incremental growth of villages and smaller rural settlements, so that local need is met at a local level. A smaller number of houses in a larger number of villages would support the sustainability of rural areas, reversing decades of settlements being held in aspic, unable to incrementally grow to meet the changing needs of the community.

The 2017 Housing White Paper, *Fixing our broken housing market*, identified that housebuilding is too slow and the construction industry is too reliant on a small number of big players. Building more, smaller sites could address both of these problems, as smaller sites can often be built out more quickly than larger sites and use small and medium-sized enterprises (SMEs), which aligns with the Government's ambition to attract smaller builders into the housing market.

### 5.2 Sustainability assessments

The way in which local authorities currently assess the sustainability of settlements is outdated and harmful to smaller villages and hamlets. Rather than judging a settlement solely on what services they or their neighbouring settlements have, the assessment must be reformed to consider what services could be supported if development were enabled.

For example, if a community has lost its school or pub, it may be that a small-scale, proportional development of family homes could enable the school or pub to come back into use. It may also be that a development of housing for the elderly allows larger homes best suited to families to be freed up, enabling younger families to return.

In addition, digital connectivity must be given greater weight in the sustainability assessment, not only for its role in connecting communities to services which may have been lost, such as a bank or a doctor's surgery, but also for its role in enabling people to work and run businesses from home as well as the social and well-being benefits.

### 5.3 Housing needs assessments

The housing need of rural communities should be met within the community, rather than within the wider local authority. Local planning authorities should be required to conduct a housing needs assessment in settlements not allocated housing in the local plan. The housing needs assessments should identify the number of homes needed: market, affordable rented, shared ownership, houses under the First Homes scheme, housing for the elderly, and serviced self-build plots.

In order to ensure there are resources to carry this out, the Government should allocate funding from the Community Housing Fund to local authorities for housing needs assessments. These could then be completed by the local authority, the community, or the parish council.

Identified local housing need should then be met, where possible, within the local community. A similar approach should be taken to the rural exception site policy, whereby several plots of land are identified and reviewed, until a suitable site is found.

#### **5.4 Permitted development rights**

The uncertainty and high cost of the planning system is a barrier for many rural landowners. Permitted development rights would remove the uncertainty and encourage more rural landowners to provide critically needed affordable housing for rent aimed at the local community.

The new permitted development rights could allow the construction of between one to nine affordable dwellings for rent on a rural exception site. Prior approval would be required and would need to be the subject of carefully thought-through criteria. There would also need to be a condition that the housing must be built, retained, and managed by the landowner for the benefit of the local community.

#### **5.5 Inheritance tax conditional exemption**

Rural landowners are key to the provision of rural housing but rented property is currently considered an investment asset and therefore, on death, will be subject to inheritance tax. This is a barrier to landowners who would not want to increase the inheritance tax faced by their families, especially where the long-term financial returns are only likely to be marginal.

This proposal postpones the payment of inheritance tax, which can act as a significant barrier to many landowners bringing forward new housing for their local communities. The proposal can be achieved by amending the definition of designated property in section 31(1) Inheritance Act 1984 to include affordable property.

A recent report by English Rural and CPRE has estimated that “for every 10 new affordable homes built, the economy will be boosted by £1.4 million, supporting 26 jobs and generating £250,000 in government revenue.”<sup>11</sup> When multiplied by the number of affordable homes needed, this could have a significant impact on jobs and well-being across the economy.

11. English Rural, CPRE, [Rural recovery and revitalisation](#), 2020

## 6. Case study – Lawrenny, Pembrokeshire Coast National Park, Wales

### 6.1 Background

In May 2020, the village of Lawrenny obtained planning permission for 39 new homes, workspaces, and a new village green, after fifty years of perseverance, lobbying and determination navigating the planning system. The development is hoped to be finished in 2026.

In 1969, David Lort-Philips took over the family farm, becoming responsible for the future of an estate village, Lawrenny, that had fallen into disrepair. Previously populated by retired or active farm workers, it soon became clear that despite building up the dairy herd, the number of people that the estate could afford to employ on the land would have to fall, reducing the need to house farmworkers.

For the village to regain its former vitality as a living, working rural community – previously based on agriculture, but also on other traditional but long-gone activities such as quarrying, and fishing – new ideas were needed. For a remote, rural community, the only solution was to provide the village with modern housing and working premises.

The vision fifty years ago, which has now become Lawrenny's flagship statement, is for a community which encourages people to live, work and play, ensuring that the village has the critical mass to support economic activity and infrastructure as a post-agricultural community.

### 6.2 The planning system

Lawrenny, one of many examples across England and Wales, felt the full impact of a planning system which continues to deem small, rural settlements as unsustainable, limiting development opportunities. In 1970, a plan was prepared by local architects, envisaging the total removal of farming activities from a site within an undefined settlement boundary, but within a few yards of existing housing. An outline plan was taken to the relevant planning authority, then a special National Park committee. The concept was approved in outline and detailed plans awaited.

Fifty years later, following decades of lobbying, three statutory development planning exercises plus attendant enquiries, the application was progressed from original concept to final planning approval for the addition of 39 houses in May 2020.

Lawrenny's situation in a National Park only worsened their issues with planning. Local planning authorities continue to ignore the economic needs of village communities in designated areas. It is too often assumed that communities located in designated areas derive particular financial benefit from simply being where they are. Tourism businesses in particular which use this as their principal and only brand often find activity highly seasonal and vulnerable, while the settlements around them struggle with the social issues arising from excessive second home ownership.

### 6.3 Sustainability

There are five principles underlying Lawrenny's development and sustainability: human, social, financial, natural, and intellectual. This strategy is already working at Lawrenny, before the development has finished, with a diverse mix of families who live and run businesses in the village.

Like many rural villages, over the years Lawrenny has lost a number of its services, including its school and post office. Now with a diverse population, the village has enabled a number of local amenities to return, with many more hoped for in the future. For example, the village supports a local shop which can now be accessed 24/7 using contactless technology, facilitated by a community project to install broadband in the village. The village also has a successful pub, a very busy cricket and football club, and a popular hostel.

The design of the new development has been named an “exemplar of rural development in Wales” by the Design Commission for Wales. It is based on the history of the settlement, including the traditional features and curtilages of the 18th century buildings. It reflects the local vernacular, with smart sourcing of local materials, and future-facing sustainability features (energy, water, waste etc) connected to the working organic farm ecosystem.

The 39 new homes (of which seven are affordable) and the inclusion of new offices and workshops, will help Lawrenny to remain a living village and to support amenities so often lacking in communities in deeply rural areas.

## 7. Conclusion and summary of recommendations

### Conclusion

Housing is central to the sustainability, viability, and vitality of rural communities. For the economy in rural areas to thrive, for the health and well-being of communities and for a well-managed environment, there needs to be an adequate supply of rural homes in the right place and of the right size and tenure.

The growing demand for rural homes in a post-pandemic England and Wales offers important opportunities for levelling up the economy in rural areas, and urgent action is necessary to avoid an even greater disparity between supply and demand, and a deepening of the rural housing crisis.

For the risk to become an opportunity, the planning system must support and enable organic, incremental growth in all rural communities. This can only be achieved if local housing need is assessed and met within the community, rather than within the wider authority and if local planning authorities change the way they assess the sustainability of settlements.

In order to encourage and support more land to be brought forward for rural affordable housing, the risk, uncertainty, and high cost of obtaining planning permission must be mitigated by introducing permitted development rights for rural exception sites. In addition, the inheritance tax burden for a landowner building and retaining affordable homes for rent must be removed, so that more landowners can choose to build affordable rented homes despite the low returns.

The recommendations in this CLA report, *Sustainable Communities: the role of housing in strengthening the rural economy*, are critical for rural renewal, levelling up the economy and for diverse, sustainable, and resilient communities.

### Summary of recommendations

In order to create sustainable communities and strengthen the rural economy through housing, the CLA believes the following actions are necessary.

- 1 The National Planning Policy Framework (NPPF) must return to a policy which promotes organic incremental growth in settlements of fewer than 3,000 inhabitants, which would lead to a small number of houses in a larger number of villages.
- 2 Local authority sustainability assessments should be reformed, to place greater emphasis on digital connectivity in recognition of the services that can be accessed online; and to assess which services could be supported if development were enabled.
- 3 Local planning authorities should be mandated to undertake a housing needs assessment across all rural settlements without a housing allocation so that identified local need can be met at a local level.
- 4 Permitted development rights should be introduced for new-build affordable housing for discounted rent on rural exception sites.
- 5 Conditional exemption from inheritance tax should be expanded to affordable rented housing for the period the homes remain let as such.

# SUSTAINABLE COMMUNITIES: THE ROLE OF HOUSING IN STRENGTHENING THE RURAL ECONOMY





# LAND, LANDOWNERS, AND THE DELIVERY OF AFFORDABLE HOMES IN RURAL AREAS

**September 2023**

Phoebe Stirling, Nick Gallent and Iqbal Hamiduddin



**UCL**



ENGLISH RURAL



# FOREWORD

## **The countryside has an acute affordable housing crisis.**

Less of the housing stock is owned and managed by affordable housing providers when compared to urban, house prices are typically higher than other housing markets and local incomes lower. There is high migration from urban to rural areas and not enough new rural homes are being built. For several decades now there has been a lack of ambition and investment in tackling this issue. It is a problem getting worse each year, to the detriment of the national economy and rural communities.

This insightful project, completed by researchers from University College London in collaboration with English Rural Housing Association undertakes a 'deep dive' into the use of rural exception sites as a mechanism for delivering new homes in the countryside. Most critically, affordable homes that secure benefit for the local community and low-income households who have a need to live there. In short, the research explores what is seen as an important part of the solution to the countryside's housing crisis.

First established in national planning policy back in 1991, rural exception sites provide a route for delivering small scale affordable housing developments in rural settlements. Subject to certain conditions being met, including ensuring that homes remain affordable and that households with a local housing need are given priority, planning is given on an exceptional basis. The exception being that the land to be developed sits outside of the settlement boundary and would not ordinarily attract planning permission.

Exploring rural exception sites in the way that this research does shines a light onto an underutilised and underrated planning policy, that when used effectively, has the potential for delivering transformative benefits for villages across England. When done well, the approach delivers a targeted development of new homes in partnership with local people, at an appropriate scale - meeting local housing need, securing economic gain and providing wide ranging benefits for landowners.

Through their work the researchers have listened to first hand experiences and appraised actual rural exception site developments to draw together a series of objective and impactful recommendations. They have explored a range of real-life examples incorporating both successes and failures, examined these through the lens of different but critical players involved to secure unique and contrasting perspectives.

The recommendations emerging from this work provide a blueprint for scaling-up affordable housing delivery in the countryside through more effective awareness raising, and a positive approach by local planning authority and enabling agents.

# FOREWORD

Perhaps most critically, the researchers explore the essential role that landowners play in making rural exception sites available and the lack of clarity around site values and permissible incentives. As well as getting a unique glimpse into the views of landowners, the researchers expose the informal rules guiding site values and inconsistent approach to offering incentives outlined within national planning policy guidance.

During 2021/22 only 548 homes were built using the rural exception site policy and most of these within a handful of local planning authority areas. This research must be the start of a bigger conversation about leveraging the policy nationally to deliver the affordable homes that those who live and work in the countryside desperately need.

**Martin Collett,**  
**Chief Executive, English Rural**



# RECOMMENDATIONS

1

## ***Getting good information to parish councils***

To have a consistent and positive approach to supporting RES development in Local Plans and supply every parish council with up-to-date information about the RES policy and how it works in their area, so that they understand the role they can play and the process.

2

## ***Understanding what makes RES different***

Train Rural Housing Enablers and similar roles with the expertise necessary to convey how RES sites are different and can help to provide an extension of the already existing community.

3

## ***Qualifying landowner incentives***

Bring together a taskforce to develop guidance on incentives permissible on RES developments, beyond that for cross-subsidy and from this publish additional guidance to qualify the incentives that can be used to encourage landowners to release land, framing these in a way that is transparent, reasonable, and proportional.

4

## ***Better use of Rural Exception Sites through a national programme***

Through political commitment there is better promotion and use of more effective policies for delivering RES with an ambition that each rural settlement in England delivers a proportionate development of affordable homes.

5

## ***Promoting 'good design'***

Produce a good design that showcases positive RES development to counter local stigma around what new homes will look like, and how they will affect the character of already existing communities.

# WHY IS AFFORDABLE HOUSING IMPORTANT TO RURAL COMMUNITIES?

Affordable housing is vital for building thriving and sustainable rural communities. In small towns, villages and hamlets, there can be a significant gap between local earnings and house prices. Since wages in rural areas do not guarantee access to the housing market, access to good quality, affordable homes, usually provided by a housing association or other registered provider (RP), means local residents can stay in their area. By allowing people to stay in the communities they are connected with, affordable housing contributes to the wellbeing of families, allows young children to attend local schools, and allows adult children to remain living close to their parents. It situates people in important social networks and thereby contributes to the social life of a local area.

It also allows people to live where they work, providing access to local jobs and supporting the rural economy. Organic community growth is supported by a range of different kinds of housing, providing homes for people in a range of different types of employment. These functions also underpin the community vitality that makes rural areas so attractive to newcomers, either holidaying or moving to the area. But low build rates mean that rural areas have proportionally far fewer affordable homes than urban areas (Taylor 2008; Baxter and Murphy 2018), resulting in a lack of housing options for people living and working in rural communities. This can have detrimental social and economic consequences, like outmigration of low-income and younger groups.



# THE CHALLENGE OF AFFORDABLE HOUSING DELIVERY

Rural RPs exist for this purpose, delivering a service that the market cannot. Central to the work of delivering affordable housing, is dealing with the price of land. The cost of land designated for housing development (land price is determined by best permissible use) is one of the greatest obstacles to delivering non-market housing. Developing housing in rural areas can be particularly costly, in part due to the higher cost of housebuilding. Sites are smaller and economies of scale harder to achieve, resulting in less affordable housing. Since the smaller income raised from affordable rents and sales cannot cover the costs of market development, RPs rely on finding low-cost sites, to deliver affordable housing in rural areas.

This is set within a planning framework that prioritises ‘sequential’ development, showing a preference for expansion of urban areas over development in rural areas. The desire of local communities to protect the countryside, rural amenities, the environment and house prices can also restrict development in rural areas. This, combined with the migration of affluent groups out of cities and into the countryside, where their financial resources often eclipse those of local populations, means the demand for houses in rural areas can outstrip supply, pushing land prices further upwards. A central challenge faced by rural RPs is therefore finding low-cost sites on which to build affordable housing.

“  
**The cost of land is one of the greatest obstacles to delivering non-market housing**  
”



# HOW DO RES SUPPORT THE DELIVERY OF AFFORDABLE HOUSING

Rural exception sites (RES) are a policy mechanism for delivering affordable homes on small plots of rural land that would not otherwise be granted permission for housing development. Since 1991, housebuilding has been granted on these sites in the 'exceptional' circumstance that any development is guaranteed to provide affordable housing for people with a connection to the local area, in perpetuity. Otherwise, these sites would not be granted planning permission, meaning the land carries a lower value, potentially removing the cost impediment to affordable housing delivery. The value of these sites is not dictated by the policy and is open to negotiation in each case, but if land can be secured at a price well below the value of land for open-market development, this makes it possible to build affordable homes in rural areas.

Despite the benefits that landowners can gain from bringing unallocated land forward for RES delivery – achieving a greater value than for its best permissible use – securing sites for RES delivery is still a huge challenge for rural RPS. Questions therefore arise about how RPs can work with landowners to encourage more sites being brought forward, and what additional mechanisms might be required to support their work.

By granting exceptional permission to build housing on land with a lower value, RES can play a key role in the delivery of more affordable homes in rural areas. This was recognized when the National Planning Policy Framework (NPPF) was first published

in 2012, encouraging the inclusion of RES policies in local plans.

Traditionally, rural exception sites could be used only for affordable housing. However, since 2012 the NPPF has stipulated that “small numbers of market homes may be allowed at the local authority’s discretion, for example where essential to enable the delivery of affordable units without grant funding”. This cross-subsidy is an additional mechanism to encourage more land being brought forward for RES development. Building some market housing on exception sites is intended to generate funds that will subsidise the cost of the land, making affordable housing development viable where it might not otherwise have been. The viability of each scheme, the need for cross-subsidy and amount of market development required to make schemes viable without grant funding, will be assessed by the local authority and subcontracted consultants, and paid for by the landowner. Views are mixed as to the appropriateness of building market housing on exception sites.



# HOW DO RES SUPPORT THE DELIVERY OF AFFORDABLE HOUSING

The main advantage of cross-subsidy is that it incentivises landowners to bring sites forward. But there is a risk that the potential for market development changes landowners' expectations of the value they can achieve by bringing land forward for RES delivery. Safeguards may also be necessary, to limit the amount of market housing built on exception sites and preserve the primary purpose of providing affordable housing, held in perpetuity for local needs. .

Despite the benefits that landowners can gain from bringing unallocated land forward for RES delivery – achieving a greater value than for its best permissible use – securing sites for RES delivery is still a huge challenge for rural RPS. Questions therefore arise about how RPs can work with landowners to encourage more sites being brought forward, and what additional mechanisms might be required to support their work



# WHAT DO WE ALREADY KNOW ABOUT RURAL EXCEPTION SITES?

During the past 30 years, the factors affecting the progression of RES have been periodically investigated. While research in this area is not comprehensive, the following observations can be drawn from the research literature.

While RES delivery is significant for local communities and may feel significant at the level of individual villages, it has not been used to deliver great numbers of affordable homes nationally (Webb et al 2019). A significant proportion of affordable rural housing has been created using RES, but this should not be confused with overall delivery. The policy “actually delivers relatively few new homes to rural communities” (Taylor 2008).

Indeed, the geography of RES delivery is patchy, with only 14 of 91 rural authorities delivering homes on these sites in 2016/17, 37% of which were delivered in Cornwall alone (Baxter and Murphy 2018). A map of where homes on RES were delivered between 2017 and 2022 is presented at the end of this report, and a table of the top-delivering local authorities is provided below.

A key impediment to progressing RES is a lack of information. Information on the need for affordable housing in a local area can be scarce, so the first port of call in progressing RES is often the local authority housing enabling officer or Rural Housing Enabler (RHE) (Lavis et al 2017).

Table 1: Local authorities with the most affordable homes on RES, 2017 to 2022

LOCAL AUTHORITY	NUMBER OF AFFORDABLE HOMES
Cornwall	1097
Shropshire	264
Sedgemoor	185
North Norfolk	101
Derbyshire Dales	93
South Cambridgeshire	89
Cheshire West and Chester	86
East Hampshire	85
Winchester	68
Stroud	65

Source: Local Authority Housing Statistical Data Returns, Affordable Housing Supply, 2017-2022



A RHE can give landowners information about possible housing associations they can work with, can work with local communities and collect data to assess the need for affordable housing locally, and help to build local support (RHA 2021). However, as Webb et al (2019) observe, coverage of RHEs has declined.

A further impediment to progressing RES are the expectations of landowners (Baxter and Murphy 2018). The 'hope value' of land can discourage landowners from selling sites for RES development (Satsangi and Dunmore 2003). Therefore, working to manage landowners' expectations around the value of their land can be a central part of the work that goes into affordable housing delivery. This might be done by appealing to their other priorities, such as a desire to see local communities thrive. Landowners may even have their own priorities and preferences for the site (Lavis 2017), and large estates may see 'stewardship' as a motivating factor for releasing land (CLA 2017).

The approach taken by the local planning authority can also affect the success of exception site policy. Many local authorities have RES policies in their local plans, but may not pursue them in practice (Satsangi and Dunmore 2003), viewing them for 'exceptional' use, applying very strict criteria, thereby discouraging engagement by local residents and landowners (Taylor 2008). The CPRE (2020) observes that the wording of RES policies are significant, and can put off landowners if they seem like a list of criteria disqualifying sites from the policy.

Finally, the literature tells us that local support is essential for successful RES delivery. Local residents are not always in favour of affordable housing development. However, the buy-in of local residents may be more likely when schemes are in keeping with village aesthetics and use local materials (CPRE 2020).

The research in this area therefore acknowledges that the RES policy does not deliver on its potential, and highlights some impediments to delivery. Nevertheless, more could be learned about these impediments from those who are successfully working to overcome them, encouraging landowners to bring forward sites, building consensus amongst those with divergent views, and maintaining support for these projects. Our research involved speaking with RP officers working on the ground to bring RES projects forward, liaising with communities and landowners (see Table 1). We aimed to find out more about what it really takes to make land available for RES delivery, and given this, why the RES mechanism might be falling short of its potential.



# WHAT DOES A RES PROJECT LOOK LIKE?

RES projects can start in many ways and can develop very differently. There is no fixed formula. Projects may be kick-started by landowners looking to sell their land; when a parish council decides to survey the local need for affordable housing; or when the local authority requests that this is done. While no project is the same, from the RP perspective, the general model can look like this:





After the Heads of Terms are agreed, a legally binding agreement will be set out in the Option Agreement, to sell the land subject to gaining planning permission.



If pre-application discussions are positive, this provides the security to move forward with a planning application, including a public consultation to receive comments and objections from the local community.



The interviews and case studies we undertook for our research suggest that successful projects are those with the most transparent and open dynamics between all parties. It is therefore important to keep all parties in touch and updated of all developments throughout the project. There will be multiple back-and-forth exchanges throughout.

If planning permission is granted, this represents a watershed moment in the project timeline. A contractor will be identified, this will usually involve a formal tender process that is managed by the housing association. A surveyor would also be engaged to look after the on-site day-to-day aspects of the project, on behalf of the RP.



A nominations agreement will be drawn up to allocate the housing to local residents, to be included in the S106 agreement. This includes making sure that any buyers of discounted sale housing are not put in a position they cannot afford.

At completion, the RP's housing management team will take over from the contractor.



# WHAT ARE THE CRITICAL FEATURES OF RURAL EXCEPTION SITE DELIVERY?

**Our interviews with national stakeholders drew attention to various features of RES delivery that can impact on the success of projects.**

## **Registered housing providers need to invest in building durable local relationships**

Delivering housing using RES requires that RP officers work closely with other partners. The RP has the successful delivery of each project as its priority. Whether they are brought on board by a parish council looking to build affordable housing to support their community, contracted by a landowner looking to sell their land, or by a RHE, the RP will play a central role in the project, liaising between all the other interested parties and making sure each side is satisfied and prepared to move the project forward.

It therefore falls to the RP to build and maintain a good relationship with local landowners, which can be crucial to the success of projects. One major task is to understand what further incentives might be needed to encourage landowners to sell their land at a price that is viable for the RP.

There are different 'tiers' of relationships that need to be maintained at different levels, from the small local builder, local parishioners, local planners, ward councillors, independent community organisations with experience of progressing RES, to the statutory authority, or Homes England.

Creating a joined up approach between these parties can facilitate the kind of open environment that fosters ongoing support for RES projects.

## **The long timeframe of rural exception sites can affect critical partnerships**

A major feature of RES projects is that they can be drawn out over very long timeframes. Some projects take up to five years, others even longer. This means that both support for and opposition to any scheme can wax and wane, and the continued support of the parish or parish councillors cannot be taken or granted throughout. People can change their minds, parish councillors and local planners can come and go. For example, in the case of Hernhill, the RES project was already at consultation stage when three people from a local opposition group were voted onto a parish council of seven. New parish council members can tip the balance and change the minds of supporters. When there are changes in personnel at local planning authorities, new planning officers may not be convinced by the project, and can reject a planning application that had previously received informal support for approval. It may be necessary to revisit aspects of the application, redo a site search to conclusively demonstrate the need for a specific site, or have a second housing needs survey done, confirming an ongoing need for affordable housing.



The timeframe of these projects makes it necessary to maintain contact between all parties and maintain momentum throughout. RP officers often take on the role of project coordinators, making sure everyone is kept in the loop. This role comes at a cost, requiring a significant amount of up-front consultation. But the in-depth work required to identify local housing need, to identify sites, and to manage local opposition, means that RES projects will usually be lengthy. Overcoming this challenge is about staying the course, keeping all parties engaged, and taking one challenge at a time, rather than attempting to solve every problem at once.

### **Identifying the most appropriate site can be a contentious process**

Another major challenge can be the potential for conflict about what constitutes the best possible site. The parish council and local planning authority may have very different ideas about the sites that are available.

Once a parish council have chosen a site they feel is appropriate, they may feel committed to this site and the contribution they believe it will make to their community. This may not align with what local planners judge to be suitable, for example if there is a risk of flooding. Choosing a site can depend on negotiation between these groups, for example by communicating to a parish council that their preferred site is inappropriate, or communicating to planners that a site is non-negotiable and that the project won't go ahead without it. Even where planners and the parish council are agreed on a site, local residents have been known to club together to fight for an alternative use, or even to buy the land themselves, as may have been the case in East Boldre.

### **The housing built on rural exception sites is often misunderstood**

Even where RES development has the support of the parish council, local opposition can be fierce, and stop a scheme in its tracks. At times this may be based on a misunderstanding about the housing contribution that RES makes to a local community. RES schemes always give priority to new residents that have a local connection to the area, as well as a need for affordable housing. This local connection ensures that residents will be found from those within or engaged with the local area and that developments form an extension of the existing community. People do not always understand this feature of RES housing, and may fear that housing on RES sites will provide general needs social housing for people from outside the local area. Even when this distinction is made clear, people may fear that it will not be held to in each case.

The local connection criteria of RES housing may therefore need to be communicated to parishioners right from the start of a project. Where projects take a particularly long time, conducting additional housing needs surveys can help to bring new parties on board by confirming the need for affordable housing in the area.

The design of schemes may also affect their acceptance by the local community. There is a stigma around low quality affordable housing, that goes hand-in-hand with the fear that RES will change the character of a place by introducing new residents without any local connection. Parishioners are less likely to support projects when they fear these will not be sympathetic to the existing social fabric, character, and style of a place.

An assurance on good design, high standards, and that developments will be consistent with local aesthetics could help to affirm RES development as an extension of the existing place, for the people who live and work there.

**Cross-subsidy is not always sufficient to meet landowners' expectations for their land**

Increasingly, a challenge for RES delivery is that landowners are looking for better returns from their land than from traditional RES delivery. The NPPF states that 'a proportion of market homes may be allowed on the [exception] site at the local planning authority's discretion, for example where essential to enable the delivery of affordable units without grant funding'. Some local plans limit the proportion of market homes to the minimum necessary to support viability. However, there is no strict policy about additional development on rural

exception sites, for landowners' benefit. This means RPs must enter into negotiations with landowners who are not otherwise interested in selling the land at or near agricultural value. With levels of cross-subsidy established between the RP and the landowner and only then agreed with the local authority, the distinction between cross-subsidy and landowner incentives may be blurred. In addition to building market housing for cross-subsidy, RPs often provide further development on the site, such as serviced plots, site improvements, or including commercial property to be retained by the landowner in the planning application, as an incentive.

This sort of incentive was well known to our discussants, and to the landowners they worked with, who went into negotiations with a 'hope-value' far exceeding the agricultural/non-housing value of their land. Commercial sensitivity may prevent RPs from discussing the true value of RES plots openly.

**Commercial sensitivity may prevent RPs from discussing the true value of RES plots openly.**

Discussants explained that the value of additional development needed to be 'proportionate' to the value of the land, so as not to set unrealistic precedents. Nevertheless in reality, the value going to landowners in exchange for RES plots certainly exceeded the £10,000 that has often been associated with the policy.

Since there is no formal policy as to the value of RES plots, nor of any additional

development that might be required as an incentive, these are negotiated informally on a case-by-case basis by the landowner and RP. This comes at a cost to RPs, who need to manage the expectations of individual landowners in each case, balancing these against their own financial constraints, rather than having recourse to a consistent approach.



# HOW CAN THE CHANCES OF SUCCESS BE MAXIMISED?

## 1. Support of the parish council is key

The support of the parish council is important in part because the local authority planning committee will have a hard time approving a planning application that the parish council doesn't support. Additionally, the support of the parish council may be critical in their ability to bring local objectors round, meaning public consultation can be particularly difficult when the parish council is not totally behind a project. In our case study of East Boldre, the RP English Rural had been contacted by a local landowner about a pocket of land they wanted to sell, and the parish council were not involved from the inception of the project. While they were supportive in principle, they had reservations about the site, and the scheme was beset by opposition, and was ultimately unsuccessful.



Cases where the parish council are involved right from the outset have shown greater success. At Leaveland near Throwley, the parish council had a clear view that affordable housing was needed in order to house families who had lived in these villages for a long time. They contacted the organisation Action for Communities in Rural Kent (ACRK) which then got English Rural on board. This meant the local community were involved at the stage in which the housing association were brought on board, which may have engendered greater trust between them

## 2. Managing the planning process

Both pre-applications and planning applications can be time consuming, and require several back-and-forth exchanges with local planners to make sure all possible factors affecting development have been considered, and that the development satisfies local policies. RP officers can play a significant role in maintaining this relationship, which can require consistency and repeated exchanges to maintain dialogue with the local planning authority. If the parish council and others involved in bringing the project to planning are convinced by their chosen site but this is dismissed by the planning authority, it can help to include every detail about the site search process within the planning application.



This can serve to convince planners that every step has been taken to consider alternatives, leaving no choice but the selected site. In Leaveland near Throwley, English Rural engaged in a back-and-forth debate with the local planning team about the site chosen by the parish council. In the end it was felt that securing planning permission came down to persistence, and working to persuade the planning team to accept the site over two years. The intervention of an experienced RP may be decisive at such a stage, preventing a battle-of-wills between local authority planners and parish councillors with very different ideas of what constitutes the most appropriate site.



From the local planning authority's perspective, it can be helpful to consider the wording of any RES policy within the local plan. These policies should seek to support rather than to restrict RES development. Continuity of resourcing may also be an issue, because of the long timeframe of RES projects, and the turnover of planning officers can stymie projects as officers' views may shift. In the case of Hernhill, and West Kingsdown, the local planning authority took the initiative to invite all parish councils locally to have a housing needs survey done, kick-starting the discussion about affordable housing across the borough. The goal was to be systematic and survey all local housing need in the area, rather than taking the piecemeal approach more usually applied, in which parish councils initiate housing needs surveys as-and-when they decide to.

### 3. Managing public opposition

Managing the concerns of local residents at public planning consultations can require taking each comment at a time, considering its value, and addressing it on its own terms. This is therefore a lengthy process, but helpful if local residents are going to feel heard and come to support the project. Part of the strategy for dealing with opposition at public consultations, we were told, is separating the 'planning objections' from the 'emotional objections'. Practical concerns, such as those to do with road access, can be addressed in a systematic way. For example, in the case of West Kingsdown, the main objector was a nursery, which had concerns about houses overlooking the nursery grounds.

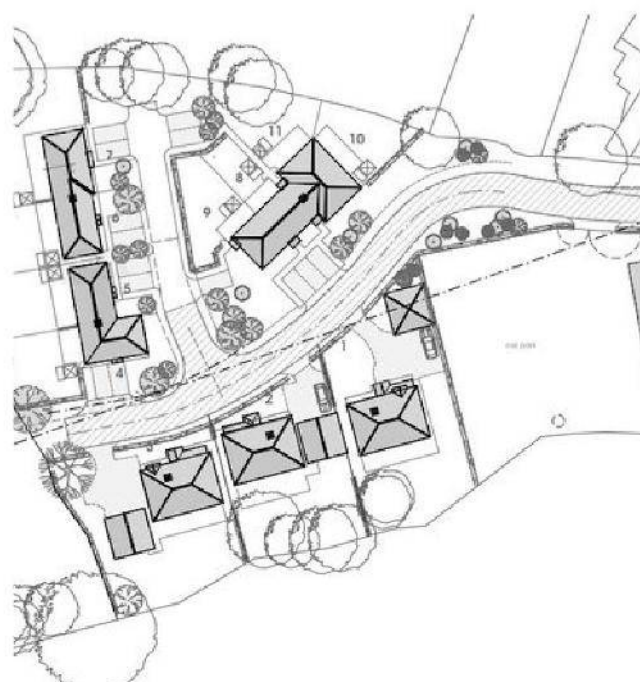
This can be addressed through the design of the scheme. A very different kind of objection are those raised by people more fundamentally opposed to development. Addressing these concerns can be a more delicate matter of making the case for local needs housing in the area.

If local residents feel they have somehow been left in the dark, this can create opposition to a scheme that would be less significant if they felt more in the loop. The public may feel the parish council have been 'operating behind closed doors' if public consultation takes place after a long period of internal negotiation. In Hernhill, when a local action group formed in opposition to the scheme and three members were voted onto the parish council, English Rural invited them to become part of the project's design group. This extended the length of the project, but meant they were really listened to, and may have given them a clearer sense of the project's goals and constraints. While this kind of collaborative approach can be hard work, in this case the group withdrew their opposition.

#### **4. Housing associations need to build long term relationships in order to garner local support**

RPs may find that they need to have a long-term strategy for managing RES, rather than managing each project on a case-by-case basis, in order to maintain a good track record for delivering on their promises, and a reputation for consistent outcomes. The final quality of a scheme, how well managed it is once it is up and running, or whether it reflects what the

community felt they were going to get can all affect a RP's reputation. Consistency in these areas over the long-term can help RPs to manage local opposition in specific cases. As part of this strategy, RP officers may do well to identify potential hurdles in advance, such as if a landowner is using a rural exception site to begin developing on land that the community would otherwise object to. In Burstow, the prioritisation of need above connection with the local community and economy resulted in homes being allocated in a way that had not been expected by the parish council. Discussing issues like the local authority approach to allocating homes upfront helps to maintain a culture of transparency and avoids one where one party may look to apportion blame to another. Regular information exchange with all the other parties involved in a scheme will be key, but also with other rural RPs, who may be able to share their experience. This need for intensive communication is increasingly one of the main costs associated with smoothing the delivery of RES schemes.



## 5. Incentivising landowners

There are two broad schools of thought around incentives for landowners. The first view is that the main incentive lies in the granting of exceptional permission for the development of affordable housing, providing greater value to landowners than for agricultural/non-housing use. According to this view, the RP should only need grant funding – or additional development for cross-subsidy – to support the cost of development.

Under this school of thought, there are still various incentives that RPs can use to encourage landowners to bring land forward. These include the landowners' ability to maintain an ongoing interest in the site, for example by building or delivering the housing themselves, as was the case in our case study of Chiddingstone. Larger estates in particular may wish to retain nomination rights, if they have employees living in local affordable housing, as was the case in Leveland near Throwley. Even when landowners are keen to bring land forward for RES, they will need the energy and enthusiasm to become involved in the RES process, which can be lengthy, time consuming, and complex. In Chiddingstone, English Rural were able to help the landowner with the transaction costs associated in bringing land forward, helping them to manage the process and the relationships involved. In Hernhill, English Rural were able to help the landowner manage personal opposition, by keeping him in the loop about all details, and letting him know everything that was being done to address opposition to the scheme.

The second school of thought is that landowners releasing land for RES development are foregoing the 'hope value' attributed to their land, when they release it at less than full residential value. This view sees land released for RES development as being sold at a discount to RPs, even when the current best permissible use may be agricultural. It is this sense that landowners are selling their land at a discount which makes additional incentives necessary. Our research tells us that RPs are faced with this reality. Since rural RPs are concerned primarily with getting schemes off the ground and to completion, they have no choice but to engage in negotiating additional incentives with landowners.



There is no strict policy about additional development on rural exception sites, for landowners' benefit. Local planners may be reluctant to give guidance about what additional development will be accepted in a planning application, or how to manage the design of such schemes, because while it is recognised that additional development can be required to achieve the buy-in of landowners, planners prefer that RES sites are not

used to open the door for further residential development.

We identified various ways that RPs can work with landowners to incentivise RES delivery without opening sites to further development down the road. By keeping additional development to an agricultural (rather than domestic) standard, this can limit the potential for further development close to the site, and help to satisfy local planners that this will not be 'the thin end of the wedge'. Features like an access road, or a concrete foundation for a building, can benefit the landowner if they are retaining some land or development for personal use. Features like these are cost-effective incentives: small exception sites often require access roads in any case; contractors may build foundations for their own on-site offices during the development phase; meaning they don't add to the cost of the scheme.

Some landowners are very upfront about what additional development or land value they expect to achieve in exchange for bringing forward their land. Others may not be so upfront, preferring instead to negotiate later, once plans are more progressed. Others may not even have clear ideas about what they expect from the process, beyond the cost of the land. RP officers may have to work to draw out landowners' feelings about the different approaches and incentives available. In-person meetings may be the best means of doing this, allowing RPs to view the site for themselves, and building a full understanding of the landowners' position.

Nevertheless, it remains that incentives for landowners to release RES plots have been established on an ad-hoc basis, and that RPs are left to negotiate these in an unclear policy context.



# REFERENCES AND ACKNOWLEDGEMENTS

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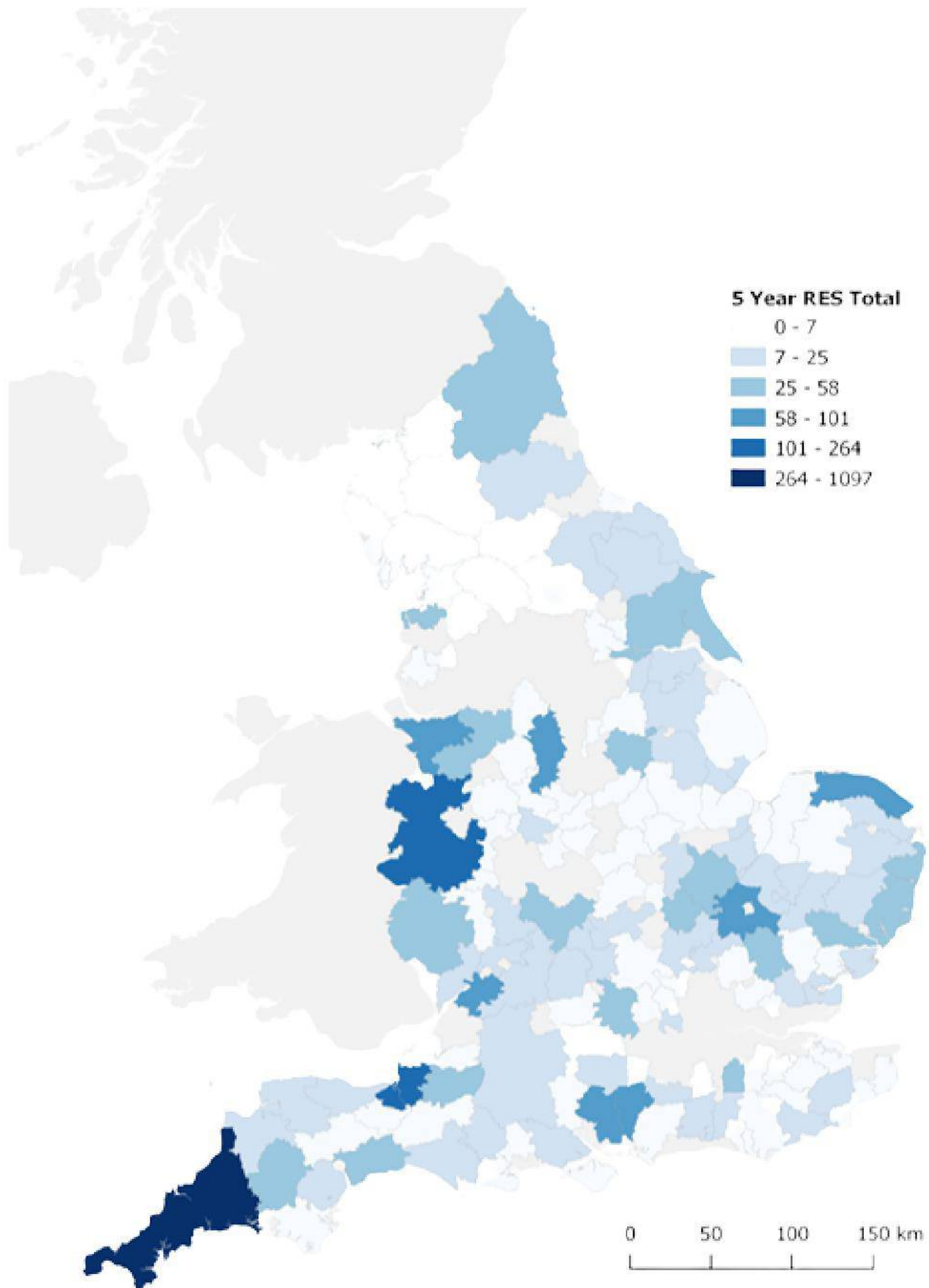
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# MAP 1: DISTRIBUTION OF AFFORDABLE HOMES ON RES, 2017-2022



# TABLE 1: CASE STUDIES OF RURAL EXCEPTION SITE DEVELOPMENTS BY ENGLISH RURAL HOUSING ASSOCIATION

Name of Parish	Local Authority Area	No of affordable homes	No of market homes	Date completed
Burstow	Tandridge DC	3 affordable homes	None	2022
Chiddingstone	Sevenoaks DC	8 affordable homes	3 open market homes	Not yet completed
Dunsfold	Waverley BC	6 affordable homes	2 homes for discounted market sale	2020
East Boldre	New Forest National Park Authority	Unsuccessful	Unsuccessful	Unsuccessful
Hambledon	Waverley BC	5 affordable homes	2 open market homes (bungalows)	Not yet completed
Hernhill	Swale BC	6 affordable homes	2 open market homes (bungalows)	2022
Leaveland near Throwley	Swale BC	6 affordable homes	2 open market homes (bungalows)	2019
West Kingsdown	Sevenoaks DC	10 affordable homes	2 open market homes (bungalows)	Not yet completed

**Summary**

- i. We support the plan in general**
- ii. We believe the buffer of 643 houses is too high, has been arbitrarily set and should be removed or reduced substantially**
- iii. The housing numbers should be transparently calculated and discussed**
- iv. The 2024 Settlement Hierarchy document and methodology has some flaws**
- v. Four Marks and South Medstead should be declared a Tier 4 settlement, as such it should not attract so many allocated sites**
- vi. Consideration of surface water flooding should be included**
- vii. Some of the allocated sites within Four Marks should be removed or reviewed**
- viii. We support spatial strategy and in turn, the Neatham Manor Farm large site, as being the best location close to Alton and all its services.**
- ix. We have detailed comments on the policies in relation to place-making, flooding and transport.**

**1) Overall position of F4FM**

Fight4FourMarks (F4FM) does cautiously support the draft Local Plan given that most of the draft Policies are supportable, and most of the specific Allocated Sites within LDA area appear logical. We also recognise that a Local Plan needs to be adopted as soon as possible to provide some control and protection of the District.

However, we do have some reservations (see sections below) on the quantum of housing needed, the Settlement Hierarchy and various other issues, such as surface flooding and sustainability, and choice of certain allocated sites.

We do find some of the policy wording used to be vague and ill-defined, without quantitative measures to assess conformance to policy. This leaves the Council exposed to costly litigious challenges by developers and others. We feel that “tighter” policy definitions are required throughout. We also note the sparse mention of wildlife protection and conservation in the Allocated sites or other developments around the District, or in policies governing the building work and approval of sites with specific wildlife present.

In addition, we have contributed to the response to the DLP from the Four Marks and Medstead Neighbourhood Plan Steering Group (NPSG) and fully support its content and recommendations. This response here is supplemental to that.

**2) Calculation of true local housing need**

It appears that the calculation of the housing targets in the Local Plan are rather too vague and inconsistent in places. We feel that any excessive number of houses will inevitably result in carving up green landscape within the District, so much more transparency should be shown to be taken. As it is, the calculation appears to be tucked away, perhaps in some other background document. In the DLP documents, no “workings” of how the number is derived is given openly. We are concerned that the number of houses proposed 9,082 is in excess of the actual figure required. The Plan already includes an increase of 54% above the objectively assessed local need for the district, due to current Affordability Ratio used in the Standard Method for calculation.



Furthermore, as the total calculated housing figure is now an *advisory* figure and not compulsory, this “freedom to adjust” should be reflected in the policy, and discussing adjusting the housing numbers downwards to reflect the SDNP area and so on. The housing figure also includes a buffer of over 10% and 643 homes for “unmet” needs in South Downs National Park and South Hampshire, which is not a fixed figure and could increase putting even further pressure on those settlements that are the least able to withstand significant housing.

We also believe that full transparency of how the housing number is derived in a simple chart would greatly benefit local plan readers, and allow the Inspector to realise the calculation is clear, accurate and correctly justified. We have prepared a simple chart showing these calculations (slightly simplified):

- The lower part of the chart shows the buffers and uplifts on the locally assessed true need. These adjustments far exceed the total site allocation of 3500. In the case of the buffer (643) this is simply plucked out of the air to make a round number of 3500. No rationale for the size of this buffer is offered.
- Similarly, the housing need is taken as 83% of the total assessed need of 10982. Why 83%? If the more realistic measure using population ratio, a figure of 72%, was used, some 1177 excess houses could be saved from being built.
- Finally, the Affordability Ratio uplift (although part of the Standard Method) uses a ratio based on local salaries and local house prices. There is no recognition that in fact new housing will be taken up by people migrating inwards, and since there is little local employment growth, these people will commute to work outside the District, earning much higher salaries than those locally.

The target for the minimum number of houses to be included in the EHDC Local Plan to 2040			
		per annum	2021-2040
<b>a. THE CALCULATION by EHDC</b>			
	<b>1. The Standard Method</b>		
	The starting position is the Standard Method calculation for the whole of the EHDC district. This gives the figure of 10980.		
	Step 1 - <i>Setting the baseline</i>	375	7125
	Step 2 - <i>An adjustment to take account of affordability</i>	54%	
	<b>Total</b>	203	3857
			578
			10982
	The Plan assumes that the LPA area takes 83% of this total [The LPA area is the EHDC District that lies outside the SDNP]	83%	
		478	9082
	<b>2. The Plan then says that much of this requirement has already been catered for</b> so that the total number of houses that need to be allocated is 2857	existing planning permission completions	3965 -3965
	Section 3.25	windfall	940 -940
			1320 -1320
			2857
	<b>3. The Plan then adds an amount of "buffer" for "flexibility and potentially unmet needs"</b>		643
	<i>"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".</i>		
	<b>Thus, the total allocations are 3500</b>		<b>3500</b>
<b>b. THE CHALLENGES by F4FM</b>			
	<b>1. The Buffer</b>		-643
	There is no need for an additional buffer as the Plan already overprovides for the limited geographic area of the LPA		
	<b>2. The SDNP</b>		-1177
	The Plan assumes that the LPA area takes 83% of the total calculated by the Standard Method. This reflects the 'duty to co-operate' with the SDNP.		
	If the SDNP took the number of houses pro rata to the existing population it would be 72%		
	<b>3. The Affordability Ratio</b>		-3857
	The AR increases the number of houses required in the District with the intention of reducing the average house price. However, these houses will be provided to those migrating in from other Districts and do not reflect 'local need' as defined by the 'baseline' assessment in the Standard Method		
	Furthermore, 100% of these additional 3857 houses will be allocated to the LPA.		

F4FM requests that EHDC review the housing need in the light of these factors, taking great care to re-examine the need, to be more transparent in its deliberations and calculations and more specifically

the adjustments being proposed. Each unnecessary house risks losing another green chunk of land forever.

### **3) Settlement Hierarchy discussion**

- a. We strongly welcome the fact that proposed development is basically proportional to the settlement hierarchy as defined in Policy S2, i.e. the larger settlements with more infrastructure will receive a larger proportion of the development. The logic of this in the light of climate emergency etc is commendable. We support putting the bigger sites near the larger settlements, where there could be employment opportunities, reduced commuting and greater use of public transport etc.
- b. We note the new hierarchy tiers are now 5 levels, as opposed to the previous 4. Therefore, it is not possible to directly compare the new tiers with the previous iteration in 2023, or interpret what a given tier level means in terms of settlement character or classification.
- c. We also believe that the omission of classification of tiers as service centres, urban centres etc in both the DLP and supporting documentation makes evaluation of the impact of the tiers on “attitudes” toward development difficult to access. We believe this needs to be rectified to avoid any misunderstanding.
- d. Paragraph 3.38 implies that all Tier 3 settlements are equally “sustainable”. This generalisation is over simplistic; each settlement has individual characteristics. This statement needs to be removed, to avoid future litigious challenges of a Tier 3 settlement or a site within that settlement.

On page 423: we see:

*In the revised settlement hierarchy of this Draft Local Plan, Four Marks is identified as a Tier 3 settlement. Tier 3 settlements across the Local Plan Area often provide a focal point for the surrounding villages and rural areas in terms of the provision of local services and facilities. Although they do not have as wide a range of services as the higher order settlements (Tiers 1 & 2), they are still considered as sustainable locations*

Thus, we see clearly that EHDC define Tier 3 settlements as “sustainable”, as with Tier 1 and 2. But that implicitly tier 4 and tier 5 are not. We fail to see how this can be generally true with markedly different accessibility scores within the Tier 3 grouping.

- e. In assessing the accessibility scores, the consultant Ridge has used hexagons placed over the settlement map in its documents, in particular the new Settlement Hierarchy Document. We note that in several cases these hexagons are not well placed over the settlement areas. For example, Bentley (page 28, map 4), or Ropley (page 40, map 27). This results in one “relevant” hexagon (paragraph 5.5 explains this). However, there is undoubtedly some distortion of the score as a result of this “offset hexagon” effect. Ropley has a SPB far wider than one hexagon, for example. While Bentley has a station nearby, and this is not included in the Bentley “hexagon array”. We conclude that the hexagons are often rather badly positioned for each settlement examined. We note also that in paragraph 4.12, Bentley is said to include Bentley station hexagon scores, whereas they are reported separately in figure 3, (p16) with only one relevant hexagon for Bentley village. We discuss Bentley sites in section 5 c below.
- f. **Moreover, we note that Bentley and Headley (both important Tier 3 settlements) are not listed in figure 5 of the Settlement Hierarchy document. This is a glaring omission.**
- g. All these visible flaws in the Hierarchy evaluation leads to possibly incorrect conclusions about each of the District’s settlements.
- h. Perhaps, a better way to examine the raw accessibility scores is to look also at the number of “relevant” hexagons shown in figure 3, page 16. This number reflects the geographic *spread* of the settlement’s SPB, or it’s “sprawl” factor. This itself does reflect to some extent the overall population (or number of houses and roads causing the spread) of the entire settlement, but that

very spread is *detrimental* to the settlement's sustainability rating in terms of car use to access services and travel generally. We therefore see no reason to use a higher population or equally, a higher number of hexagons for a settlement, to justify moving that settlement up a Tier level (e.g. paragraph 6.9). In fact, we feel rather the opposite, a settlement with a high score and small number of relevant hexagons would indicate a compact village with good central services and transport and thus a good potential for *sustainable* housing nearby the settlement. An example would be Grayshott (score 17.3 over 6 hexagons) or Headley (score 15.4 over 4 hexagons), both new Tier 3.

- i. The argument for doing this adjustment of tiers seems a little lightweight and arbitrary, and moreover undermines the Ridge scoring system completely. F4FM maintain that the Tier level manipulation upwards based on population is both illogical and incorrect.
- j. Fig 5 of the new 2024 Settlement Hierarchy document shows that FM/SM scores identically to Ropley at 14 (both comfortably within tier 4) per the numbering system (para 5.18, page 17) of the Settlement Hierarchy document. Four Marks/South Medstead does not score close to a tier boundary. The same applies to Rowlands Castle. Four Marks and South Medstead (FM/SM) in particular, has been singled out to have its legitimately scored tier rating modified adversely (i.e. upwards) (*paragraph 6.9*), and yet the very same document recognises the spread-out nature of Four Marks and South Medstead (*paragraph 5.12*) that means a low accessibility score and "natural" Tier level of 4. The Settlement Hierarchy document is thus contradictory, and should be corrected. We can see no justification in moving FM/SM up a tier level due to its spread-out nature (it does not have good accessibility), and indeed, using the population to justify the movement up a tier is also erroneous.
- k. The FM/SM score is low because the development has been intense over the last few years with little to no added infrastructure, so it is a very dispersed settlement spreading out 3 km along the A31 trunk road. So, whilst population is "high", the accessibility score is indeed low, meaning people need their cars to access local services. **As such FM/SM is not fully "sustainable".**
- l. **We strongly believe Four Marks/South Medstead should remain in tier 4 to reflect the TRUE character of the settlement which is largely an unsustainable car-centric settlement.** In addition, further consideration of the sites in FM/SM that have been chosen needs to be taken to review if they are in fact truly sustainable. This review would be routine at this present moment (Mar 2024) (using the current EHDC CPxx policies) if these sites come up for speculative Applications (as some have already). EHDC need to be seen to do the same for Local Plan site allocations.

#### **4) Surface water flooding**

On page 422 of the sites. Chapter 12, it is stated that Four Marks does not suffer from Fluvial or groundwater flooding. But it omits entirely any mention of serious surface water flooding, which there undoubtedly is. The entire plan needs a surface water map, like it has for fluvial and ground water. **Ensure a surface flooding risk map for East Hampshire is included in the DLP.**

We urge EHDC to take account of the increased frequency 'x year significant rainfall events', plus climate change, particularly with regard to the effect of surface water runoff from each respective development site.

There is a particular problem in Four Marks and South Medstead. Although on a Clay Plateau, Four Marks suffers from surface water flooding despite being over 180 m above sea level. As local residents in Four Marks, we have to experience that surface flooding every time it rains heavily, especially along Lymington Bottom. The problem is that Lymington Bottom and Lymington Bottom Road in South Medstead are part of the same river valley (the old river Lym) and Mother Nature insists it wants a

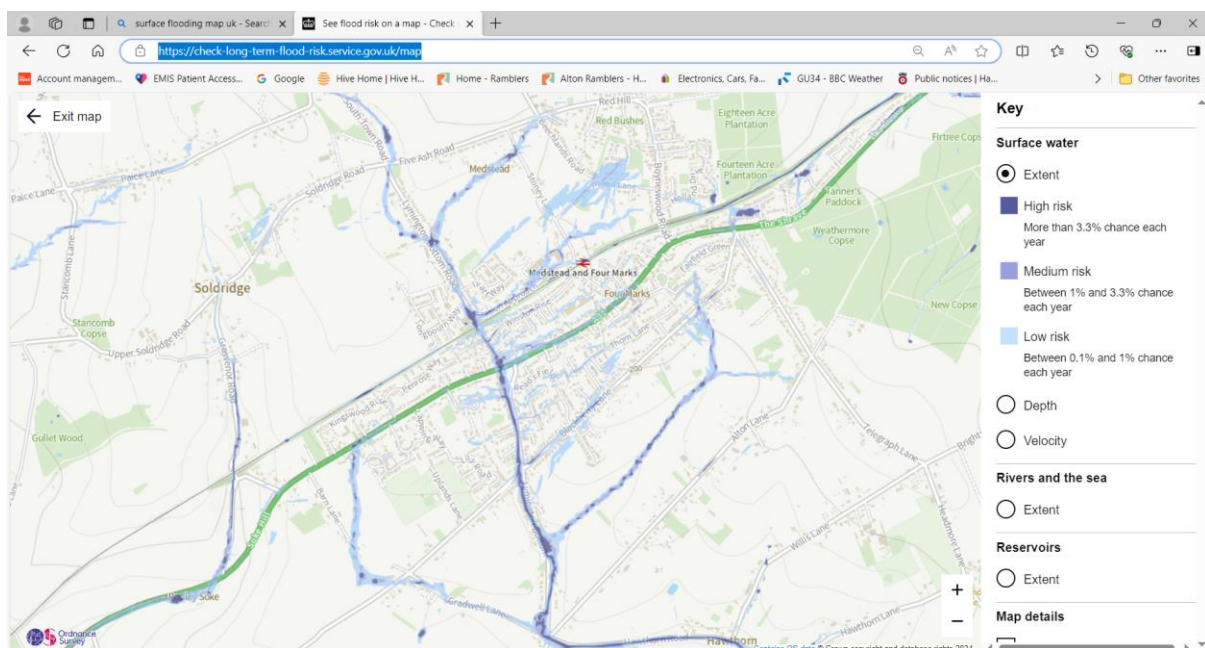
river there, to channel the surface water, despite mankind building a road etc. along the valley. That surface water comes from the infiltration into the clay plateau layer above the valley on both sides. So, all the surface water from above the road either runs down to the Lymington Bottom/Road valley or soaks in and then the groundwater exits from the clay layer edges and fills the valley anyhow. The result is frequent flooding along Lymington Bottom. This clay layer extends under practically all of the housing in Four Marks and South Medstead. F4FM are deeply concerned that with the massive house building on the clay plateau, actual or planned in this Local Plan, will forever disrupt the surface water flows, and increase the flooding at any low points in the villages.

We believe we are reaching the point where ANY more house building in Four Marks/South Medstead will have significant adverse surface flooding and drainage effects around the villages. An example is already happening in the recreation ground in Four Marks. This is waterlogged a good portion of the winter months, due to the nearby “Medstead Farm” (Charles Church) development’s foundations interrupting the groundwater flows away from the recreation ground, meanwhile Lymington Bottom floods more regularly. Belford House care home further south on Lymington Bottom was flooded in 2014 and the residents had to be evacuated, the adjacent plot behind 87 Lymington Bottom regularly floods with a veritable river flowing down to Lymington Bottom, the Five Lane ends junction by the local Primary school is regularly flooded (a dangerous spot to flood with the kids crossing to school there). This is despite Hampshire Highways installing various schemes to manage this water, including at the bottom of Blackberry Lane and at Five Ash Road Pond.

**We believe that EHDC should greatly increase the consideration of surface water flooding across the District, and take this into account when selecting site allocations.**

Below is a map of the surface water flooding in the Four Marks & South Medstead area.

[See flood risk on a map - Check your long term flood risk - GOV.UK \(check-long-term-flood-risk.service.gov.uk\)](https://check-long-term-flood-risk.service.gov.uk/map)



The map clearly shows the high risk of surface flooding in Lymington Bottom and Lymington Bottom Road. Two of the allocated sites in Four Marks have high surface water risks.

We note that the main Four Marks site affected (Barn Lane) does have a flood map as part of the discussion section attached to that site (p 433).

**Allocations of sites in the Local plan which suffer from surface flooding must surely be questioned as to their suitability *over and above* the other criteria used for selection.**

**We also note that with all the planned housing in Alton and that proposed in Four Marks, that the sewage works in Alton will need considerable expansion, and therefore that site ALT3 is reserved for only that purpose, since there is no other land available.**

**5) Site Selections**

a. Introductory remarks:

F4FM have very real concerns regarding the level of over-development in Four Marks and South Medstead. There have been almost no upgrade/additions to the infrastructure but very substantial increase in dwellings (571), and with planning in place for 75 more, despite the JCS having set a total requirement of just 175 up to 2028. Despite this very large surplus over the target, over 200 more are now included in the current Draft Local Plan, again without any substantial change to the infrastructure. We maintain that infrastructure cannot be retrofitted to our smaller settlements. The over-development in the past has not been accounted for in this new Draft Plan, and there is no reason to expect that it will be prevented in the future, once the new Plan is adopted.

In addition to this the settlement of Four Marks/South Medstead is subject to numerous speculative Planning Applications, some currently already in the system. This remains of great concern to residents as demonstrated by high planning objection numbers to these Planning Applications, none of which meet the criteria for Policy acceptance, (outside SPB, 4YLS in place). These applications should not, as residents fear, be constantly considered as windfall, disproportionately impacting Four Marks and South Medstead.

b. General site selection:

Following the logic of using an accessibility score for a settlement to determine its hierarchy, it surely makes sense to assess each potential site from the Land Availability Assessment (LAA) for the DLP using the same method- if only to ensure it is a sustainable site, along with the usual deliverability and other factors. F4FM believe the Ridge study 1 contains this rating for some of the LAA sites. <https://www.easthants.gov.uk/sites/default/files/2024-01/Report%201%20-%20accessibility%20study.pdf>.

This is a key process that must be objective (score-based) and transparent. While it is a Draft, how will EHDC justify the inclusion (and retention in the ultimate adopted Local Plan) or conversely exclusion, of a given site, if there is no objective measure for all to see? More open debate on the scoring and selection methods are needed, even if this is contained in another document. The lack of transparency is always a point of vulnerability for developers and others to exploit later.

c. Choice of sites in Four Marks (tier 4 in our opinion- see 3) ) versus Bentley (tier 3):

F4FM note the site allocation distribution, which is roughly proportional. In Ch 12 of the DLP, page 332, figure 12.1 shows Bentley having few houses (20) allocated versus its tier level 3, even accounting for Four Marks/South Medstead (210) and Rowlands Castle (145) having already been bumped up a tier from their natural tier 4 score. (See section 3 above).

Looking at the LAA 2023 and bearing in mind that Bentley scores 16.7 (page 16 of the settlement hierarchy paper) in the settlement Hierarchy, far more than Four Marks and South Medstead (13.9- not near top of tier 4 at all), we note there is just one site of 20 houses west of Hole Lane allocated to Bentley. The LAA/ Ridge report 1 lists many sites in Bentley, a lot of them available in <5 years, all with good accessibility scores. True, FM/SM has more in pure number of sites, but Bentley has several sites with as good if not better accessibility scores:

FMS 2 Land Rear of 97 to 103 Blackberry Lane – This site has a Ridge and Partners Transport Report 1 accessibility score of 8.

FMS4 Land South of Winchester Road – This site has a Ridge and Partners Transport Report 1 accessibility score of 11.

The ONE site in Bentley BEN-017 (land west of Hole Lane) is scoring 13. But BEN-005, -108, -013,-011 all score higher still.

So, we ask, **why is Bentley, a Tier 3 settlement, NOT having more of these sites defined as allocated sites?**

d. Sites chosen within Four Marks:

i. Blackberry Lane, FMS2: FM-015.

We question the selection of this small site. We note that it is currently awaiting planning decision as a speculative Application, but has two holding objections from LLFA and Landscape Officer, and strong objection from Parish Council and 118 public objections. The site has a large slow-worm population per the Ecological Report. The Ecological Report for the current planning application identified (Table 6) potential negative effects of the development in respect of all the following:

- ° Bats (roosting)
- ° Bats (foraging)
- ° Dormice
- ° Reptiles (slow-worms)
- ° Breeding birds
- ° Hedgehogs

In particular, the potential negative effects on slow-worms and hedgehogs were considered 'major'. Indeed, the Reptile Survey Report identified an 'exceptional' population of over 20 slow-worms distributed evenly across the site. Measures can be proposed to mitigate these negative effects (e.g. slow-worms can be moved to another location) but the efficacy of such measures is highly questionable.

Furthermore, it is important to note the consultee comment by the Archaeological Section that the site is 'in an area of some archaeological interest with the projected line of the Roman road between Winchester and London running along the north western edge of the site'. They requested that no development should take place until the applicant has implemented a programme of archaeological assessment involving trial trenches, to ensure that any archaeological remains encountered are recognised, characterised and recorded.

There are also concerns about the potential provision of deep-bore soakaways in that the installation would contribute to flooding issues on Lymington Bottom and the Lead Local Flood Authority does not regard this as a sustainable solution.

The site lies clearly outside the current SPB and south of the widely-recognised "line" of Blackberry Lane- Brislands Lane which defines the de-facto southern edge of the settlement in terms of housing density and character. Yet, in the DLP, we see the site included and a proposal to move the SPB to include this site. It appears the biggest threat to the SPB is the next EHDC Local Plan! Given the apparent over-estimation of housing need (see section 1), surely this sensitive site of only 20 houses can be removed from the allocation list?

- ii. Land South of Winchester Road FMS4; FM-025.

The surface flooding on this site needs careful evaluation (see section 4). F4FM feel this lowers the scoring for this site due to the costs of mitigating this flooding over the long term. The site is at the limits of sustainability and distance from local services. Careful examination of the impact of road access onto A31 is needed, and any facilities such as a convenience store need to be sited visibly off the A31 to render it viable. The southern end and western edge of the site should be made with low-profile rooflines and as green as possible, to taper into the rural areas to the south near Brislands Lane etc.

#### **6) Neatham Manor Farm site ALT8; BIN-011**

We welcome the strategy which highlights a more focussed distribution of development throughout the whole LPA area and support the proposed allocation of a single strategic site (at Neatham Manor Farm). The logic for Neatham Manor Farm is that it is adjacent to the largest and most sustainable settlement in the LPA area and direct link to the A31 trunk road without affecting the rest of the town or District. However, we believe that the delivery of this site and in particular it's associated infrastructure is crucial for the success of this housing distribution strategy. The school and stores etc should be built early on to take the families moving into the first phases of houses going up. The loss of a green hillside is regrettable, but houses have to go in a sustainable location, as this seems to be. We particularly favour this choice of location as all the residents can easily access the A31 to commute to towards London, or south to Winchester, or of course to get into Alton itself. We note the new pedestrian and cycleway proposed across the bridge over the A31; this will form a valuable route for Alton residents to go into town centre for shops and train etc, while providing a safe route out for families to walk south of the town and south of the A31.

We hope the footpath 020/1/1 passing though the site can be made pleasant and safe to use, and not too narrow a green "corridor". More attention to this footpath's exact route and to make new A31 crossing points (e.g. dropped kerbs, road markings, visible to motorists approaching the roundabout) over the newly expanded A31 roundabout needs to be considered also- the current crossings at the roundabout are very dangerous, and the path is rarely used. A link to the pavement on Montecchio way on the north east side of the A31, would also be useful. This all needs to be rectified to make the footpath 1 a popular route that de facto is used and gives people true benefit.

We also note the quite apparently sympathetic retention of green infrastructure around the edges of the site, to protect the rural scene along the Hangers Way (paths 020/26/1, 020/70/1, 259/31/1, 259/31/2, 259/32/3, 259/33/1, 020/3/1 and 002/703/1 ) and other paths in the region to the south, including the SDNP boundary only 1500 m away.

We won't comment in detail on any of the other Alton based allocated sites, particularly as the Alton Neighbourhood plan is still being finalised, but again the logic of building close to the biggest town in in the District to keep things sustainable, is one we agree with. Far better that residents have a short walk or cycle to town, than a ten-mile return journey as from Four Marks, to get to a reasonable supermarket etc. But that does not overcome the fact that Alton does not have enough stores (e.g. clothing) to avoid the need to go to Basingstoke, Winchester or Farnham.

F4FM also would like to point out that Neatham Manor Farm is likely one of the LAST sustainable locations for large scale development left in northern East Hampshire. For example, any further development on the south side of the A31 at Alton would not have that vital A31 link that Neatham Manor Farm does; Chawton Park Farm has already been rejected by EHDC as being unsustainable and too far from Alton centre. No sites in FM/SM can be considered sustainable in comparison. So, in 2040 the next local Plan might require a different housing strategy.

#### **7) Sense of Place (DES)**

Our response to DES of the Draft Local Plan is informed by the Ministry of Housing, Communities and Local Government's National Design Code - *Planning practice guidance for beautiful, enduring and successful places*.

Crucially for Four Marks, the NDC emphasizes throughout, the need to consider the *existing* settlement and its residents; (Sec. 60) states '*Creating a positive sense of place, helps to foster a sense of belonging and contributes to well-being, inclusion and community cohesion.*'

***"The topography, landscape character, cultural history and built form – all define context."***

- Context is fundamental when considering Four Marks because it is typically judged *not* to be a settlement with a distinctive character. This was illustrated most recently at the February 2024 Appeal hearing for 46 Lymington Bottom, where a key argument of Gladman's was that Four Marks has little or no character to defend.
- A hundred years ago, Four Marks was a scattered settlement with a significant number of 'heroes' acres' with pre-fabricated colonial style dwellings. Its infrastructure has evolved to service the needs of those passing through as much as the residents of the immediate area.
- The historic parcelling of land has resulted in unplanned residential development eating up fields originally set aside for a bypass and other central areas once used for social purposes and employment, such as the Windmill pub and adjacent garages.
- The challenge for Four Marks today is this legacy of piecemeal development and poorly designed estates.
- The settlement is lacking in social infrastructure, with residential areas that are hard to read and navigate. Infill development has left many public rights of way under pressure, reduced to muddy corridors with high close - boarded fencing because houses have been built right up to the edges of the footpaths.

**The Draft Local Plan - Positives and Challenges for Four Marks:**

The Draft Local Plan recognizes the historic and current development challenges faced by Four Marks and resists the inappropriate location of major settlements.

It also recognizes the importance of well-designed places, creating sustainable settlements by ensuring that developments respond positively to the ten key characteristics set out in the National Design Guide.

- Firstly, defending local character - the disparate architectural styles and poorly discernible central hub have failed to create a distinctive character to the built environment, resulting in an absence of a perceived strong sense of place. However, the A31 trunk road running through the settlement defines its character overall- the through traffic is vital to local shops, with tight availability of car parking nearby. **All other settlements of a similar size along the A31 have a bypass.**
- Secondly, defending sustainability - we are designated as a tier three settlement, though scoring only tier 4 (see section 3 above). The draft plan's stated sustainability tests, so important to the future viability of Four Marks, *only apply to tiers one and*



*two*, leaving us arguably vulnerable to increased challenge. Sustainability tests should be applied to all tiers and all development site proposals.

- The increase in the Boundaries medical facilities is welcome, but with no extra parking facilities and the increasing pressure from users of the A31, access for many residents will be extremely difficult. The parking at Oak Green and the Co-operative store opposite, are already used extensively by patients able to walk that far.
- The density and roofscape of any further development in the Barn Lane site South of Winchester Road will need careful planning. Four Marks is extraordinarily well integrated into the wider landscape, being unobtrusive in the far views, despite being on one of the highest points in Hampshire. It maintains a gentle and graduated relationship between its built environment and the surrounding countryside. The Barratts estate (Lapwing Way) is the only offender in this respect, which is why a subtle and graded interaction with the wider countryside is needed for any future development here.
- There is a lack of shared areas and places where people can naturally coalesce; even the main shopping hub, Oak Green, doubles up as the most convenient and comprehensive roadway service stop between Guildford and the M3 Winnall junction outside Winchester. This shared use not only affects the sense of place for the Four Marks community, it has a detrimental effect on the numbers and sizes of vehicles parking, pushing out local people who need to park for the surgery and local shops. The Local Plan needs to recognise Four Marks as a car-dependent settlement.
- There has, in our opinion, been an over-reliance on Four Marks's proximity to the A31 as the reason for development, with little or no thought to the other elements that contribute to place-making. At best, it has been treated as a dormitory settlement, convenient only because larger settlements with better facilities can be accessed by car.
- An example of this approach is the Barratt estate opposite the Travel Lodge. This was built at urban density and has become a satellite to, rather than part of, Four Marks. The planned 'outward facing only' vehicle access and its distance from the centre discourages walking and riding, making it a car-based community. Due to the chronic lack of parking, people tend to get in and stay in, for fear of losing an overnight spot.
- Any future developments should recognize the car dependency of residents (Four Marks has an average of three cars per household, according to the 2021 census) to avoid creating cramped environments with residential roads blighted by dangerous pavement parking.
- The positive visual integration (above) is due in large part to the well-walked lanes and tall, beautiful mature trees, hedgerows and woodland that run along their length. These features give context and connection to the less cohesive built form of a ribbon settlement. Our few quiet lanes and the low-density pattern of development away from the A31, provide essential character and amenity for all residents. These trees and other key characteristics will need greater protection through policies in the Local Plan.

- The plan should resist development beyond the existing settlement boundary to protect the countryside setting. Ask almost anyone living in Four Marks and they will cite access/connection to the countryside as the big plus to living here. This results in the popular use of the few wide and still relatively quiet lanes such as Telegraph, Brislands and Barn Lanes, that lead directly out into the wider countryside. These lanes have by default, become the main recreational routes for many residents.
- It can be argued that the still rural lanes of Four Marks are one of the few areas where sections of our community are able to meet informally and socially connect. The other is perhaps the school gate, sports field and allotments. In short, this settlement works best if you are reasonably young and /or fit and can drive a car. This is not a great profile for inclusiveness. It is important that any future plans for Four Marks support a place that can work for all ages and abilities.

No one can retrofit infrastructure or buy back so many homes built on what should have been communal land.

We cannot turn back the clock but we can stop repeating the same mistakes. Please take note.

#### **8) Comments on SPB movements in Four Marks**

Referring to the Interim Settlement Boundary review:

*Four Marks 16, Land south of 131 Winchester Road:* This small site is designated as SINC due to the presence of Dormice. There is also a small area of protected woodland under separate ownership and a large badger sett. There have been several planning applications for this site and it finally went to appeal, but refused by the inspector who also made a site visit. Why is this land now being INCLUDED in the SPB? It needs to remain as is to protect the wildlife. The inclusion of this area within the Settlement Policy Boundary is unacceptable due to the status of the perimeter hedgerow of a SINC. 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 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.

*Medstead 9: Properties along Five Ash Road:* we object strongly to EDHC placing an SPB down Five Ash Road - we believe this is unjustified and is a precursor for a future large site on the fields behind Five Ash road.

#### **9) Other specific comments on draft policies**

Where a policy number is not listed, F4FM is generally in support of the respective policy. Policies are only listed where we have a specific comment, as follows.

##### **S1.3**

We agree that the spatial strategy Fig 3.1 Key Diagram showing where development is to be located accords with the stated Settlement Hierarchy and allows for a greater development in larger more sustainable areas

##### **S2.2**

In general, we are in favour of the revised Settlement Hierarchy which is now on a more considered and fairer basis which has taken into account the representations in particular from the residents and representative bodies of Four Marks and South Medstead, the previous methodology having sought to elevate the settlement from tier 3 to tier 2. We note that a new element has been introduced moving settlements near to the tier thresholds up or down based on population, we do not understand the logic of this, surely if a settlement has finite infrastructure, having a larger population is a disadvantage and should not result in a move to a higher tier (see section 3 above).

### **S2.3**

We note that it is proposed that many smaller (Tier 4 and Tier 5) settlements are to have a Settlement Boundary (SPB), although this is not the case at present. Will the creation of these new SPB's lead to potentially unsustainable development within the new boundary?

We are in favour of SPB's in the larger areas allowing suitable sustainable development within these boundaries and precluding encroachment on the surrounding countryside, provided the development within the SPB meets the criteria stated.

### **S2.4**

We are fully in agreement with the concept that development outside the SPB of settlements listed is considered Countryside and will be restricted to that which is appropriate in a rural area as set out in Policy NBE1.

### **NBE3**

This seems fine but our concern is how is this secured in perpetuity (for at least 30years). The net gain would need to be managed and monitored by whom.? The landowner(s) ?

What if the net gain is not achieved, who checks the checkers? A more robust approach to long term management of sites for roads, drainage, lighting, green infrastructure is needed.

### **NBE7**

We believe that SUDs became a mandatory requirement from 2024 so why don't they state this in the DLP?

We believe clause (f) should be expanded to specifically include Surface water runoff, particularly as we are aware that the Flood Risk map only shows ground water/river flood risk and not the occurrences of surface water flooding. We are also very aware that the depth of the primary aquifer locally is shallow in places, and that both the EA and the Lead Local Flood agency do not recommend the use of deep boreholes as part of a SuDS scheme.

### **NBE9**

Note: The Natural England methodology has a paper on how you can calculate the annual increase of waste water nutrient load in kg. for nitrogen and/or phosphorus from a new development.

Assume the local treatment plant (Alton) (over capacity) has a permit limiting discharge into rivers/Solent basin. Can the DLP not cite each water treatment plant permit?

### **NBE10**

Seems quite subjective.

We note 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 of significance 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, we seek that Policy NBE 10 is rigorously applied to the development.

### **Policy DGC1: Infrastructure**

We support the Policy DGC1; the requirement for infrastructure to be provided at time of need, using secured funding determined at the time of adjudication of the relevant Planning Application, and 'policed' by using Grampian conditions if required. This has sadly not happened enough in the past. We hope this new policy can be better enforced.

We agree that linkages to existing or new public transport services must be in place, but note that outside of the Tier 1 and 2 settlements, these services are often almost non-existent. We remind EHDC that its Settlement Hierarchy paper determines that access to such transport should be within 400m of the furthest dwelling from the site access- a clear definition of a "sustainable" site location.

## **10 SUPPORTING THE LOCAL ECONOMY**

We are very concerned that the Plan does too little to support employment in the District. High levels of transport emissions are due to the amount of commuting undertaken in private cars because of the lack of employment opportunities in the District. 44% of those in employment commute to work outside the District. Winchester was clearly shown as one of the major destinations for East Hants residents commuting to work and this is unlikely to have changed since 2011. As such, we can expect a significant number of residents in the new homes that have already been built, and will be built as a result of this Local Plan, to impact further on A31 bottlenecks in Four Marks and South Medstead. As an obvious bottleneck in Four Marks, the Plan needs to avoid putting further stress on overloaded junctions to A31 (Telegraph Lane and Lymington Bottom). F4FM believe that the main junctions onto the A31 are at or near their practical capacity (0.85 RFC) already, and great care must be taken to ensure developments allocated to the settlements not impact this.

## **11 DEVELOPMENT MANAGEMENT POLICIES**

In many of the "DM" policies, the wording is more aspirational than prescriptive and thus open to interpretation by (costly) appeal or other processes. Some of the back-up text does have some details that ought to be inside the policy itself. It is not clear if the supporting paragraphs are part of the policy itself (i.e., legislative) or just to justify and explain the use of it (not legislative). It is noted that most of the DM policies do not affect Four Marks or Medstead to a great extent. It appears that the policies are 'protective'.

There are many references to Appendix 3 on "Marketing". *We presume this is a typo and should be changed to Appendix D.*

### **Policy DM12: Dark Night Skies**

DM12: this is a policy which will have a marked effect once implemented.

The policy DM12.1 implies **all** of EHDC (non-SDNP and SDNP) is a "dark sky" zone and this is confirmed in paragraph 11.84. This is defining all of EHDC to be a dark sky zone. This might make urban areas less well-lit and safe enough at night and may in certain areas affect crime. Police, etc., might have a strong opinion on this. If there is to be some kind of exclusion zone in urban areas where "dark sky" provision is waived, then a corresponding map/ boundary definition is needed. Also, there is no mention of a tighter dark sky exclusion zone near to the edges of the SDNP where dark skies are more rigidly enforced. However, if the intent of DM12 is indeed to make ALL of EH a true dark sky zone, this would not be needed. More clarity is needed.

### **Policy DM17: Backland development**

DM17: The SPB is there to protect from backland developments that fall outside it. However, come the new Local Plan all that is changed. In Four Marks, for example, 3 of the four allocated sites are anyhow currently in the planning application process as "speculative" Applications outside the SPB, and are awaiting decision, yet they are directly backland development outside the CURRENT SPB,

which would be rejected under DM17 or its predecessor policy. NOW, come the new Plan, these very sites will be included in the new SPB, etc., and are allocated sites in the DLP, with a clear presumption of “semi-automatic” Approval when they are entered for Planning Permission. It thus seems almost pointless to have a policy DM17, since it is just ignored (moved) when a next new Draft Local Plan is drawn up. However we recognize DM17 can thereafter protect or regulate backland development within the agreed new SPB, which generally is not a major issue to character.

**In effect, a new draft Local Plan is as dangerous to local character as allowing backland development in the first place.**

### **Conclusion**


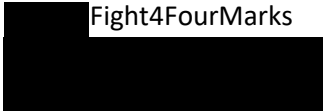
F4FM is in general support of the draft Plan, with the following reservations:

1. We question the housing supply numbers- too many houses are planned.
2. We question the Settlement Hierarchy results.
3. We are concerned that surface water flooding is simply not discussed in the Plan, whereas this is a severe problem in some local areas, such as Four Marks.
4. Site selection process needs to be more openly revealed. We question the inclusion of the small Blackberry Lane site in Four Marks (FMS2).
5. Due to its apparent sustainability and proximity to the largest town in EH, we support the allocation of Neatham Manor Farm (ALT8) in the Draft Local Plan.
6. We really think that place making is something that needs far more emphasis in developing the Plan further.

**Overall, in respect to Four Marks and South Medstead, we believe we have reached the limits of sustainable development in terms of distances to local services, flooding issues caused by massive house building on the clay plateau, incremental traffic reaching to the level of A31 junction traffic capacity, poor social cohesion and loss of sense of place. To prevent further degradation of the villages, F4FM believe strongly that the sites allocated in Four Marks/South Medstead should be carefully re-evaluated.**

Should EHDC wish to discuss any of this response, we would welcome that. Thank you.

Best Regards

  
 Fight4FourMarks



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

27 February 2024

Dear Sir/Madam,

**Subject: Objection to Proposed Housing Developments at RLC 1 and RLC 2 Sites (Land at Deerleap)**

I write to you on behalf of Forest Gate (RC) Limited, the Management Company of which all residents of the [REDACTED] are members. As [REDACTED] neighbours to the 'Land at Deerleap' we wish to formally object to the proposed housing developments at the sites known as RLC 1 and RLC 2. Our objection is grounded in several key concerns that we believe are critical to the sustainable and responsible development of our area, impacting biodiversity, heritage, landscape integrity, and local infrastructure.

**Conservation and Historical Significance:** The flint wall and the trees that line the Village Green are not only central to the character of our Conservation Area but have previously been recognized by Government Inspectors as crucial to maintaining the rural edge that defines our community. Historical objections to similar proposals have underscored the legislation designed to protect such areas, with the most recent Local Plan and the Neighbourhood Plan reiterating the importance of preserving this landscape. The unchanged circumstances since these recognitions affirm the ongoing relevance of conservation concerns.

**Wildlife and Biodiversity:** The sites in question serve as vital habitats for a rich array of flora and fauna, including species protected under law such as Great Crested Newts, Dormice, various snakes, birds, and bats. The woodland and grassland areas provide priority habitats that contribute significantly to our local biodiversity. The potential impact of development on these habitats, coupled with concerns about the effects on internationally designated sites in the Solent, presents a critical environmental challenge that has not been sufficiently addressed.

**Flooding Risk:** Positioned in Floodzone 2, the sites are known to be prone to flooding. The introduction of additional hard surfacing associated with development will undoubtedly increase runoff, exacerbating an already significant problem for our community.

**Drinking Water Safety:** The presence of aquifers in the area necessitates a careful approach to any development, given the imperative to protect and safeguard our drinking water sources. This aspect appears to have been overlooked in the planning proposal.

**Access and Safety:** The proposed access route via Deerleap Lane is inadequate for the anticipated increase in traffic, with the road's limited width and alignment already posing safety risks. Past incidents, including a fatality and several accidents, underscore the dangers inherent in increasing the use of this road.

**Impact on the Ancient Monument of Rowlands Castle:** The proposed sites are adjacent to Rowlands Castle, a scheduled ancient monument whose setting would be detrimentally affected by development. This concern further amplifies the conservation stakes and underscores the need for a cautious approach to any changes in the vicinity.

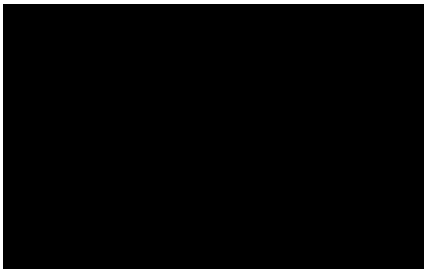
**Inadequacy in Addressing Housing Needs:** The proposal for merely 13 dwellings does little to meet the broader housing needs, while the risk for more extensive development raising significant concerns about environmental and conservation impacts that seem to have been underestimated.

**Practical Concerns for Residents:** The conservation status of the flint wall requiring it to be maintained, necessitates a longer walk for potential residents to access local services, challenges the practicality and justification for the development's location, particularly in terms of its proximity to the railway station and village amenities.

Given the substantial and varied concerns outlined above, I strongly urge the Council to reconsider the proposed development at Deerleap and remove it from the Local Plan. The environmental, historical, and practical implications demand a thorough reassessment to ensure that any future decisions align with the best interests of our community and the preservation of Rowlands Castle's unique character and natural resources.

Thank you for considering my objections. I look forward to your response and am available for further discussion should it be deemed necessary.

Yours sincerely,



**Forest Gate (RC) Limited**



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

Monday 4<sup>th</sup> March 2024

### **CONSULTATION: East Hampshire District Council Local Plan 2021-2040 (Regulation 18)**

Hampshire & Isle of Wight Wildlife Trust is an independent charity founded in 1961 and together with 46 others we are part of The Wildlife Trusts, the largest grass roots nature conservation federation in the UK with 900,000 members. Locally across Hampshire and Isle of Wight we have over 27,000 members and we currently manage 5,000 hectares of land for wildlife, primarily nature reserves of local, national, and international importance.

We welcome the opportunity to comment on the draft East Hampshire Local Plan. While we are pleased to see the environment as a key issue of the Local Plan, we consider that the Local Plan in its current form suffers from a lack of development of key policies; it does not represent current best practice in policy clarity and ambition to put nature into recovery across the district.

The Wildlife Trusts are calling for at least 30% of land and sea to be restored for nature and climate by 2030, in line with national and international commitments.

We would welcome East Hampshire District Council in joining this ambition and putting in place a clear target for nature's recovery by 2030 backed by mapping and appropriate policy mechanisms to ensure that the state of nature is turned around and wildlife starts to recover during this decade.

#### **Biodiversity Net Gain**

To ensure that biodiversity net gain truly halts nature's decline and puts it into recovery, we encourage the Council to amend draft **Policy NBE2 Biodiversity, Geodiversity and Nature Conservation** and set a target for development to go above and beyond the Government's 10% minimum Biodiversity Net Gain, instead aiming for at least 20% biodiversity net gain.

We recommend looking at Kent County Council's assessment (<https://kentnature.org.uk/wp-content/uploads/2022/07/Viability-Assessment-of-Biodiversity-Net-Gain-in-Kent-June-2022.pdf>) of the potential effect of a 15% or 20% Biodiversity Net Gain target on the viability of residential-led development in Kent. In summary a shift from 10% to 15% or 20% Biodiversity Net Gain did not materially affect viability in the majority of instances when delivered onsite or offsite. The biggest cost in most cases is to get to the mandatory, minimum 10% Biodiversity Net Gain. The increase to 15% or 20% Biodiversity Net Gain in most cases costs much less and is generally negligible and because the Biodiversity Net Gain costs are low when compared to other policy costs, in no cases are they likely to be what renders development unviable.



We believe at least 20% net gain should be achieved, and that any offsite gains should be strategically targeted through Local Nature Recovery Strategies, secured in perpetuity and be additional to other commitments and initiatives to recover nature.

LNRS and the Nature Recovery Network should be the spatial foundation for directing delivery of BNG and the wording of the policy should reflect this. We recommend that when allocating off site BNG delivery the land within the LNRS and NRN is preferred.

### **Nature Recovery Network Local Nature Recovery Strategies**

We are disappointed that the only mention of Local Nature Recovery Strategies is in the introduction to **draft Policy NBE2: Biodiversity, Geodiversity and Nature Conservation** under ‘why we need this policy’. We strongly recommend that the council go beyond the minimum national requirements. The Local Nature Recovery Strategy (LNRS) should be used by planning authorities to support land use planning in both plan making and development management. It should be used to ensure that the location of new development avoids the best areas for nature and associated action makes a positive contribution to nature recovery.

The Local Nature Recovery Strategies should act as a spatial framework, alongside the Nature Recovery Network, informing where development should be avoided and where investment in nature should be directed, e.g. through Biodiversity Net Gain. This should be reflected within the local plan by embedding the LNRS into policy.

We would strongly recommend that the council commits to the creation and maintenance of a functioning Nature Recovery Network as this is a key mechanism through which the biodiversity of the district can be protected and enhanced. It is now well established that nature is in trouble and that to put nature on the road to recovery it needs bigger, better, more and joined up space to thrive. The Nature Recovery Network, embedded within national policy through the Environment Bill, is the key mechanism to deliver nature’s recovery within the local plan, providing multiple benefits and meeting the government’s 25 Year Environment Plan targets.

Nature Recovery Network mapping is about taking a strategic spatial approach to the natural environment, identifying areas of existing value, and looking for opportunities to create connections with new habitats that will benefit people and wildlife. Without such spatial mapping, it will not be possible to identify where interventions are required in order to create the nature recovery network and thus deliver the environmental policy ambition.

Therefore, we strongly recommend that East Hampshire District Council prepare and use the Nature Recovery Network as a foundational tool for the Local Plan to:

- Identify areas within the local plan area that are of special importance within the context of the Nature Recovery Network, including: existing habitats that are of highest value, areas that buffer existing core habitat, and gaps within the existing ecological network that, if filled, would improve ecological connectivity and reduce fragmentation.
- Assess, identify and prioritise opportunities for ecological enhancement through local plans and strategies.
- Identify the best sites for development and those areas where development should be avoided. Sites of core importance to the Nature Recovery Network should be protected and development should not result in severance of ecological connectivity within the network.
- Inform the design of any development in such a way that it makes a net contribution to the Nature Recovery Network.
- Inform and target biodiversity net gain delivery and other nature-based solutions.

- Inform the use of building standards that promote biodiverse developments within local plans (e.g., Building with Nature standards) to ensure that development targets action to most effectively contribute to restoring nature.
- Send a clear market signal to developers of your expectations for all future planning to contribute positively and meaningfully to nature's recovery.

### **Green Infrastructure**

Green Infrastructure should support both biodiversity, and mitigation and adaption for the climate crisis. We would like to see the Draft Local Plan adapt the green infrastructure policy to set high quality green infrastructure principles across the built footprints of new and existing areas. This would lead to increased sustainability of developments, boost climate resilience and public wellbeing, as well as increase value, support a resilient economy and desire to live in the area.

Therefore, we welcome the inclusion of the Building with Nature accreditation in the supporting text of draft **Policy NBE12: Green and Blue Infrastructure which sets a new framework for green infrastructure**. It brings together existing guidance and good practice to recognise high-quality quality green infrastructure where wellbeing, biodiversity and water are core foundations. We recommend that the accreditation is embedded into the policy text itself to ensure maximum benefits for the health and wellbeing of residents, and for nature's recovery are delivered.

### **Water Quality**

We encourage that draft **Policy NBE9 Water Quality Impact on the Solent International Sites** is amended to include a strong preference to the mitigation schemes that will deliver wider environmental benefits. Hampshire and Isle of Wight Wildlife Trust is well positioned to deliver biodiversity net gain and mitigation for nitrates, prioritising significant added value. We are currently one of the only organisations delivering an established, high-quality nitrates mitigation programme and provide other nature-based solutions services. We would be pleased to discuss these in more detail with you.

We are pleased to see the requirement for new homes to meet a water efficiency standard of 95 litres or less per person per day in draft **Policy NBE8 Water Quality, Supply and Efficiency** is positive. However, we think this could be taken further and would recommend the council to amend the draft policy to 90 litres or less per person per day.

The River Itchen is a chalk stream. Chalk streams are rare, ecologically important habitats and a vital natural capital asset. They provide key regulatory and provisioning services as an important source of water for drinking, agriculture and industry. Pressures from over abstraction, increased development and a legacy of human modification and intervention have resulted in significant and ongoing declines in biodiversity and water quality.

Of added importance is the current, unacceptable state of river water quality with no rivers achieving good chemical status and only 16% of designated rivers meeting good ecological health. This is indicative of the current state of play with our water and drainage infrastructure that frequently fails and, which is unable able to meet existing requirements or adhere to licensed conditions. Given the current lack of confidence in effective and timely investment in our critical water infrastructure, this plan must ensure that it does not add further burden to the acute pressures faced by the District's water environment, notably chalk catchments such as the Itchen.

Conversely this plan has the opportunity to drive effective investment and safeguards through its policies.

We would like to see the recommendations of the Catchment Based Approach Chalk Stream Strategy embedded within the local plan including “Planning approval must be contingent on the pre-existence of or parallel investment in more than adequate supply and treatment infrastructure with no additional burden on chalk aquifer abstraction. Developers should make water-company developer contributions to help cover the costs of addressing such impacts”.

We strongly recommend that **Policy NBE8 Water Quality, Supply and Efficiency** is amended to have more detail on the protection and enhancement of rivers new developments must meet. We suggest the following wording:

*Development that is within or adjacent to river corridors and their tributaries will be required to conserve and enhance:*

*The natural characteristics of the river, its springs, headwaters and associated species*

- *Water sources and water quality*
- *The river corridor’s ecosystem, geodiversity and ecological connectivity*
- *The natural functioning of the river through the seasons*

*taking into account:*

- *Biodiversity and geology*
- *Natural Buffers (minimum 20m) to prevent incidents of polluting run-off and protect biodiversity;*
- *Increased public access to the river corridor and the associated impacts of this increase;*
- *Marginal vegetation and the ecological value of the area including its role as an ecological network;*
- *Aquatic and riparian vegetation of the river environment.*
- *The varying size and associated habitats within a corridor which, in order to avoid uncertainty, are defined as the habitats immediately surrounding the waterbody that contribute toward its character and ecology including but not exhaustively flood plains, water meadows, wet woodland, reedbeds, fens, mires, bankside vegetation and other smaller waterbodies within close proximity and/or sharing the same topography and geology.*

### **Nature Based Solutions**

We are pleased to see the inclusion of Nature Based Solutions in draft Policy CLIMI: Tackling the Climate Emergency however, we recommend that any nature-based solutions that aim to deliver increased levels of carbon sequestration must also provide additional wider environmental benefits, including delivering increased biodiversity. We encourage that investment in Nature Based Solutions is prioritised to be within the Local Nature Recovery Strategy to ensure that they have the have a more effective impact on increasing local biodiversity

## Strategic allocations

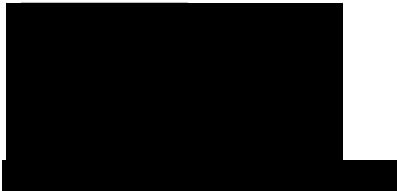
Planning ahead for the housing needs of the district, the council must be confident that the environment can accommodate the in-combination effects of development at this scale. Environmental limitations must be considered, such as the water and drainage infrastructure being overwhelmed. The council has the opportunity to deliver ambitious green infrastructure and creation and enhancement of nature which goes beyond the minimum conservation and 10% biodiversity net gain. Currently we feel there is a lack of ambition to contribute to nature's recovery through the proposed strategic developments.

In addition, we are concerned about the locations of the sites allocated which are in close proximity or adjacent to designated sites and habitats of high ecological importances (e.g. SINC's etc.) and the negative impacts they might have.

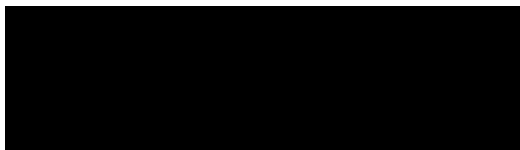
Currently we have concerns about the proximity of many of the site allocations to rivers including **ALT1 – Land at Brick Kiln Lane Alton**, **ALT6 – Land at Wilsom Road Alton** and **ALT7 – Land at Lynch Hill Alton** and the potential impacts to the River Itchen Catchment from **FMS4 – Land south of Winchester Road Four Marks**. As previously mentioned, we would recommend that there are 20m natural buffers between watercourses and development to ensure protection for biodiversity and reduce the risk of pollution reducing water quality. As mentioned in the above water quality section, the council has a responsibility to ensure that new development does not add further burden to the pressures faced by the district's water environment through policies which strengthen protection but also investing into the water and sewage infrastructure.

We hope that you will find our comments helpful and, if you have any questions or wish to discuss these matters further, please do not hesitate to contact us. I also ask that you keep the Trust informed of the progress and outcome of this plan.

Yours Sincerely,



Hampshire and Isle of Wight Wildlife Trust



## Consultation on East Hampshire Draft Local Plan 2024

Headley Climate Action Network welcomes the opportunity to comment on the draft Local Plan.


It is really encouraging to see a lot of work has gone into incorporating environmental concerns into the plan. There are, however, areas in the plan that we think could be significantly improved to support the climate emergency and biodiversity crisis and the local response to both.

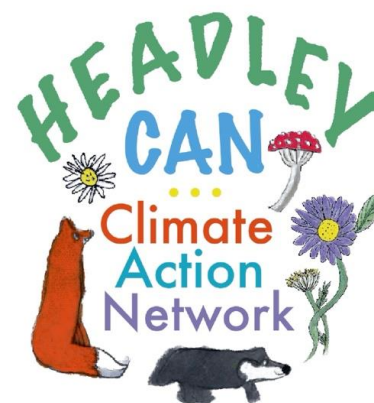
- We would particularly like to see more tangible policy, to support the many references to sustainable transport connections within the plan. This is of concern for residents of Headley where the public transport services are considered to be poor and not meeting the local need.
- In all references where biodiversity and climate impact are both relevant, we suggest that the biodiversity crisis is given equal weighting to the climate crisis. (i.e. not just mentioning the climate crisis in the Vision)
- Many objectives and policies running through the document require more definition, and targets should be more specific. The exceptions 'where the benefits outweigh the harm' should be defined more closely and it should be explained who will make that judgement. For example, in Dev and Management policies DM1.1 which refers to development which damages local ecology.
- It should also be clear who will monitor performance, and who will provide the necessary management resources for the long-term maintaining of all the environmental policies.
- It should be the case that all development will be subject to the important policies which you've highlighted to protect our natural world. For example, the exceptions in the Biodiversity Net Gain section do not appear to be necessary. With that in mind exceptions to many of the policies should be reviewed again in relation to the climate and biodiversity emergencies and be reduced in number.
- The Plan recognises the importance of the connection of people to the natural world e.g. to enhancing and improving habitats, and to improving access to open spaces, etc. We would like to see explicit policies somewhere in the Plan that require expansion of publicly accessible natural green spaces.
- It is proposed that ecological reports are required in various circumstances regarding development approval processes. We would like to see definition around these reports i.e. ensuring that they are independent, comprehensive and science based.

Our Headley Energy survey volunteers are trained and supported by Energy Alton, we have seen their detailed response to the energy sections of the plan. We support all their comments.

Many thanks for the chance to put our views forward, we hope that you'll be able to incorporate our suggestions and we look forward to the next stage in the Local Plan

Very best wishes

  
on behalf of Headley CAN



## Notes on the Draft Local Plan

1. Holybourne welcomes the exclusion of Holybourne from the draft of the Local Plan.
2. Holybourne would encourage the exploration of Neighbourhood Development Orders to maximise use of brown field sites such as car parks.
3. Holybourne welcomes the recognition by Planners that the village is an unsustainable site for development of any scale. It is too far to walk into town and bus services are infrequent.
4. Holybourne welcomes too the acceptance that London Road through Holybourne is full to capacity and that the extra traffic of any development would increase inconvenience to residents.
5. Holybourne believes that sensitive, increased densification of urban sites should be encouraged.
6. The priority given to brown field sites is welcomed.
7. The maintenance of a variety of different types of settlements throughout East Hampshire should be recognised and valued.
8. Holybourne regrets the imposition of 1700 houses in the Alton area. It is totally unfair imposing an extra housing demand because of the proximity of the South Downs National Park. The housing number should be based on the whole area of East Hants and not just that part outside the SDNP.
9. **We support Aim 3:** *Ensure our defined town and village centres provide a range of retail and associated activities to maintain and improve their vitality and viability.*
10. **We feel that the argument that East Hants should take a disproportionate number of houses because of the proximity of the National Park to be unfair.** *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.*
11. **Policy S2: Settlement hierarchy - Development in the Local Plan Area will be required to comply with the spatial strategy set out in Policy S1 and proposed sites identified in Chapter 12. The placement of Alton as the only settlement in Tier 1 is indefensible and unfair and open to legal challenge.**
12. **We support the settlement policy boundary defence as described in S1.3 S1.3** *All settlements identified above have a Settlement Policy Boundary (SPB) as identified on the Policies Map. There is a presumption in favour of sustainable development within the SPB, which will be reviewed through the preparation of development plan documents and/or neighbourhood plans, reflecting the following general approach: • Respecting the setting, form and character of the settlement; • Avoiding actual or perceived coalescence of settlements; and • Ensuring good accessibility to local services and facilities. S1.2* Development outside the settlements listed above is considered countryside and will be restricted. **Any development outside the existing settlement policy boundary in Holybourne would be a contravention of this policy and should be resisted.**
13. **We support the Council's aim defined in Policy Clim 4 of achieving net zero in line with central Government's requirements. We believe that all new houses, which could achieve a contribution to household use and to the grid, should be required to be fitted with photo voltaic solar panels and / or ground source heat pumps.**
14. **We support too, the environment policies designed to protect biodiversity.** *East Hampshire has many areas which are noted for their biodiversity value. These areas support a wide variety of species and habitats, which form an important part of the*

*network of biodiversity sites within the wider environment. This applies particularly to sites that already are rich in biodiversity and these should be protected.*

15. **There is nothing in the bullet points regarding development in the countryside that would justify development in Holybourne except in the exceptional circumstances defined in NBE1.**
16. **Policy DES2 – Responding to local character. We support the aims of this policy but would note that historical settlements have a range of buildings, some more than 500 years old and large developments are bound to overwhelm mixed character villages.**
17. *6.24 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. We support this policy regarding development on greenfield sites.*
18. *Health and Wellbeing of communities: HWC.2 The council will require a Health Impact Assessment (HIA) setting out the expected effects on health, wellbeing and safety, from all residential developments of 50 homes or more. The HIA must demonstrate how the positive health impacts it can deliver are maximised, and reduce and/or mitigate negative health impacts, with a particular regard to removing health inequalities. Where unavoidable negative impacts on health, wellbeing and safety are identified, mitigation measures must be incorporated into the proposal. We support this policy. A village survey held in 2023 in Holybourne identified a loss of security brought about by large scale development as a major source of concern which would promote a loss of wellbeing.*
19. **We support the aims of the Homes for all policy: Addressing housing need through the provision of new homes is a fundamental part of any Local Plan. The National Planning Policy Framework (NPPF) is clear that planning authorities should prepare Local Plans to boost the supply of market and affordable housing to ensure the right types of homes are built in the right places to meet the needs of the Local Plan Area. The key we feel lies in the final sentence of this extract. A small village is not the place to build large numbers of houses which would destroy the essential character of the place. Neither is a site that would be unsustainable to all but car owners.**

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

04/03/2024

Dear Sir/Madam

### **East Hampshire Local Plan**

1. Thank you for consulting the Home Builders Federation (HBF) on the East Hampshire Local Plan Local Plan. The HBF is the principal representative body of the housebuilding industry in England and Wales and our representations reflect the views of discussions with our membership of national and multinational corporations through to regional developers and small local housebuilders. Our members account for over 80% of all new housing built in England and Wales in any one year.

### **Policy S1: Spatial Strategy**

2. This policy sets out he the Council will over the plan period 2021 to 2040 make provision for the delivery of least 9,082 new homes the equivalent of 478 dwellings per annum (dpa). The housing requirement is based on the standard method but reflects the fact that a significant proportion of East Hampshire is covered by the South Downs National Park Authority (SDNPA) and as such is not the planning authority for that area. The Council estimate that the level of need in the area covered by National Park to be 114 dpa. The HBF appreciate that is difficult to assess housing needs areas such as national parks given that they do not follow boundaries on which population estimates are produced. The assessment produced by the Council appears logical and as such we do not at this stage seek to challenge the assumption made. However, we would challenge the level of unmet need that may arise from within the national park.
3. The Council state in paragraph 3.9 that in order to estimate the level of unmet needs arising in the national park the Council have based their approach on the assumption that 100 dpa will be delivered in the national park as per existing agreements. However, this does not recognise that existing agreements are only to 2028 and as such there are no homes planned





with the national park in East Hampshire for the final 12 years of the plan. It cannot be assumed that the 100 dpa will continue given that national park status is a significant constraint on development the Council should expect unmet needs arising within the SDNPA to be substantially higher than 14 dpa.

4. The SDNPA are currently undertaking a review of their local plan and the Council will need to work close with them to establish how many homes can be delivered in the area of East Hampshire covered by the national parks. Once the level of delivery has been broadly established EHDC will need to ensure, in line with paragraphs 11 and 61 of the NPPF, that there is sufficient supply elsewhere in East Hampshire to address the unmet needs of the national park. In addition to the unmet needs in the National Park the Council also note that there is a substantial shortfall in housing supply to meet needs across the Partnership for South Hampshire of 12,000 homes to 2036.
5. However, no assumptions have been made as to level of unmet needs in other areas and no consideration, aside from a further 14 dpa in response to the unmet needs in the National Park, is given in this plan to increasing delivery in order to accommodate unmet needs now or in future. The Council suggest at paragraph 3.11 that any homes surplus to the identified requirements could be attributed to any future identified unmet needs. Such an approach is not considered to be sound. Where unmet needs have been identified the council must make a commitment to delivering these homes and include them within the local plan housing requirements to ensure that they are planned for and delivered. Any surplus identified by the council in excess of their own requirement is necessary to ensure they meet their own housing needs and takes into account any delays in the delivery of the sites allocated.
6. Following this consultation the Council must consider strategies that could meet the unmet needs arising within the national park and its neighbouring in the PfSH area. Where the Council can support other areas, this must be included in the Council's housing requirement and there must be a sufficient buffer between this requirement and overall supply to ensure the housing requirement is deliverable over the plan period.

*Plan period.*

7. The proposed a plan period is 2021 to 2040 which will require the plan to be adopted by the end of 2025 to ensure that the plan looks forward for a minimum of 15 years as required by

paragraph 22 of the NPPF. The Council expect to consult on a draft plan in July of this year and submit the plan in December 2025. Whilst this plan is comprehensive for a regulation 18 consultation it still seems ambitious for the Council to properly take into account the comments made and ensure any matters relating to the duty to cooperate are addressed prior to the regulation 19 consultation in July. In our experience it would seem highly unlikely that the plan will be submitted, examined, and adopted in less than 12 months. The HBF would therefore recommend that the plan is extended by at least a year to ensure it is consistent with national policy. However, the council may wish to extend this further should it not expect to meet the deadlines set out in the LDS.

### *Housing Supply*

8. With regard to meeting the housing requirement the Council identify later on in the plan that the Council expect to deliver a further 3,500 new homes in addition to the supply already identified from completions, commitments, and windfalls. Based on the Housing Trajectory in Appendix C is a total supply of around 9,668 homes over the plan period and result in a buffer between needs and supply of just over 6%. This is insufficient if the Council are to ensure that housing needs are met in full across and that the plan is deliverable across the plan period. This is a point recognised later on in the plan with council noting at paragraph 9.18 that further allocation is required in order to ensure a buffer of between 10 and 15% between the housing requirement and the future supply of new homes.
9. As to where the additional supply should come from the HBF does not promote sites or advocate for specific sites on behalf of others. However, one key course of supply should be smaller sites of less than 1 hectare. On the basis of paragraph 70 of the NPPF, the Council need to ensure at least 10% of homes come forward on such sites – in the case of EHDC this is around 900 homes across the plan period.
10. In meeting this requirement the Council will have to ensure that these are identified as an allocation in the local plan or in the Brownfield Register and does not include small site windfalls as contributing to the 10% requirement. Whilst it will be important to promote more small sites to come forward over the plan period as windfall, as mentioned in part d of paragraph 70 of the NPPF, the HBF considers this to be distinct from the 10% requirement set out in part a of paragraph 70 of the NPPF. Further clarification that the 10% should not include windfall development is in the glossary where windfall is defined as “Sites not specifically identified in the development plan”.

11. It is important to recognise that the allocation of small sites is a priority for the Government and stems from the Government's desire to support small house builders by ensuring that they benefit from having their sites identified for development either through the local plan or brownfield register. The effect of an allocation is to take some of the risk out of that development and provide greater certainty that those sites come forward. This in turn will allow the SME sector to grow, deliver homes that will increase the diversity of the new homes that are available as well as bring those homes forward earlier in the plan period.
  
12. The Council should also recognise that allocating small sites and supporting SME house builders not only ensures a stronger supply in the short term but also improves the diversity of choice within local housing markets, support local and regional supply chains and are often pivotal in bring forward innovation and supporting jobs growth locally, with 1 in 5 of the SME work force comprising of apprentices. A failure to allocate small sites will contribute to the continued decline in small and medium sized house builders. Recent research by the HBF has found that there are 85% fewer small house builders today than there was 20 years ago and that of a survey of 202 SME house builders 87% said they were considering winding up there residential activities in the next three years. Whilst this decline is due to a range of factors more allocations of small sites would ease the burden on many SME developers and provide more certainty that there scheme will be permitted, allowing them to secure the necessary finance that is often unavailable to SMEs until permission is granted.
  
13. The Council should also consider whether opportunities arise within smaller settlements given that the focus of much of the growth in this local plan is on the tier 1 and 2 settlements. There are some settlements within tier 3 for example which were previously considered to be tier 2 settlement and could accommodate more growth. For example, the Council demoted Four Marks from a Tier 2 settlement down to a Tier 3 settlement seemingly on the basis that it is relatively linear form means that peripheral areas fall beyond new calculated walking and cycling zones. However, the settlement still has good services and could accommodate further growth, indeed additional growth would help to ensure that those services that are currently there are sustainable in the long term. This will be a similar situation across the tier 3 settlements, and they shod not be dismissed in the search for additional sites.

## **Policy CLIM1: Tackling the Climate Emergency.**

14. Sections 1.1 and 1.2 of CLIM1 are not policies 1.1 is merely a statement and 1.2 just signposts to other policies and does not provide any specific direction to decision maker or applicant. Rather than include these as policies we would suggest it would be more appropriate to set this out in the supporting text. Whilst section 1.3 provides some direction in reality it is merely repeating requirements that are set out elsewhere and as such offers no additionality with regard to decision making. The only element that provides an actual policy is section 1.4 which establishes what development should submit a sustainability statement.

## **CLIM2: Net-Zero Carbon Development: Operational Carbon**

15. Parts b, c and d of this policy would require all new development to be net zero through a combination of removing fossil fuel energy use on site, setting energy use standards for all new dwellings of 35kwh/m2/year and space heating demand of less than 15kwh/m2/year, requiring the generation of renewable energy to meet energy demand and use offsetting where for any residual energy demand that cannot be met through onsite renewable energy. The Council will require applicants to confirm a metering, monitoring, and reporting strategy as part of their detailed planning application.
16. Whilst the HBF would agree with the Council that there is a need to act to reduce carbon emissions we would disagree that this needs to be undertaken through the local plan given that there is already a national approach, the Future Homes Standard (FHS), being taken forward to achieve the same goal. Delivering these improvements through building regulations has a distinct advantage over delivering a variety of different approach across the county in that it provides a single approach that all developers understand and can be rolled out at scale. This allows supply chains and skills to be improved prior to implementation and ensure that improvements to building standards are actually deliverable from the point at which they are introduced.
17. However, if the Council chooses to go beyond current or future standards it must be done in a way that is consistent with national policy and robustly assesses its consequences and give consideration as to how the requirements of the proposed amendments to CE2 are consistent with the written ministerial statement (WMS) published on the 13th of December 2023. In this statement the housing minister notes that “*Compared to varied local standards*

*nationally applied standards provide much-needed clarity and consistency for businesses, large and small, to invest and prepare to build net-zero ready homes” and that local standards can “add further costs to building new homes by adding complexity and undermining economies of scale”. The 2023 WMS goes on to state that any standard that goes beyond building regulations should be rejected at examination if the LPA does not have a well-reasoned and robustly costed rationale that ensures:*

- That development remains viable, and the impact on housing supply and affordability is considered in accordance with the National Planning Policy Framework.
- The additional requirement is expressed as a percentage uplift of a dwelling’s Target Emissions Rate (TER) calculated using a specified version of the Standard Assessment Procedure (SAP).

18. Turning to the first bullet point, the Council will need to ensure the costs and deliverability of this policy and policy H5 are fully and robustly tested. Whilst the Council have undertaken some cost analysis in their net zero carbon study, we are concerned that these do not reflect the potential cost to the developer. This evidence would suggest that the cost of meeting these for a semi-detached house for example would be in the region of 5%. This is lower than some of the costs for similar standards set out in work by the Future Homes Hub (FHH) to support and inform the implementation of the Future Homes Standard, the findings of which are set out in “Ready for Zero”. This study tests a number of archetypes against a range of specifications from the current standards set out in the 2021 Building Regulations through to standards that will achieve similar standards to those proposed by the Council.
19. The various specifications and costs considered are summarised in Figure 8 of this report and indicates that in order to deliver standards above the FHS on a three bedroomed end of terrace house (specifications CS3, CS4 and CS5 in the FHH report) would be around a 15% to 20% increase in per unit costs compared to the 2021 Building Regulations. Whilst the specifications and assessment methodology may not be directly comparable to those being proposed by the Council there is a significant difference in the costs set out above and those in the Council’s viability evidence at between £7,500 per unit above the 2013 Building Regulations. It will be necessary for the Council to include higher costs in relation to this policy in the viability evidence if it is to consider this policy to be deliverable.
20. Whilst we would not disagree with the Council's evidence which suggests that the proposed standards are technically feasible the HBF are concerned as to the impact these

requirements will have on the rates at which sites can deliver new homes on all types of sites. Given that the standards proposed in CC2 are higher than those proposed by Government in the Future Homes Standard, which is expected to be introduced in 2025, they will likely require higher levels of fabric efficiency which will require new skills and materials that may not be readily available, and which could slow delivery the short to medium term as supply chains are developed. It has been recognised by the FHH that to deliver higher standards will require phased transitional arrangements would be needed to steadily build up the skills and ensure quality. The FHH also notes in its report Ready for Zero that even if a short transition period between current standards and those similar to the Council are proposing that this would "... create a high risk of quality problems, inflated costs and, potentially, stalled build programmes." As such consideration will need to be given as to the delivery rates of development in the early years of the plan period with fewer homes potentially coming forward in this period as these much higher standards will take time to embed.

21. Moving to the second bullet point, the approach proposed by the Council based on energy use is inconsistent with the approach set out in the WMS and as such is unsound. It should be noted that the Government have considered whether it was appropriate to use a delivered energy metric such as the one being proposed by the Council and have concluded that these do not offer any additional benefits to those being taken forward by Government. Therefore, if the Council are to require standards above those set out in building regulations they must be expressed as a percentage of the target emission rate.
  
22. The Council state in paragraph 4.22 that developers will need to use methodologies for assessing the energy performance of new homes that are "... *proven to be accurately predict a building's energy performance*" and then refer to Passivhaus Planning Package as an example of an acceptable tool in foot note 7. The HBF consider this approach to be inconsistent with the WMS which requires policies, and by extension the assessment of performance against those policies to be based on SAP. This provides consistency in the assessment frameworks for both planning policies and building regulations and ensures there is not a proliferation of assessment frameworks used that adds to the complexity for both applicant and decision maker. This clarification of national policy should be reflected in the local plan and the requirements to be included in the Sustainability Statement.

### **CLIM3: Net Zero Carbon Development: Embodied Carbon**

23. This policy requires residential development of 10 or more homes or more to calculate embodied carbon emissions and demonstrate actions being taken to reduce these. Whilst the HBF recognises that there is a need to reduce embodied carbon in development it is not evident how a decision maker would determine what a reasonable baseline is with regard to embodied or how much reduction is required. Would this level of embodied carbon then be conditioned and if certain materials are no longer and have to be sourced from elsewhere, increasing the embodied carbon compared to original estimates, would this then require an application to be made to amend the condition. Seeking to maintain a specific level of embodied carbon from the estimates made in a planning permission could be impossible without significantly delaying the delivery of new homes. Therefore, the HBF consider section 3.2 of the policy to be ineffective and should be deleted or at the very least amended to state that developments of 10 or more homes should demonstrate the actions they have taken to reduce embodied carbon.

### **NBE2: Biodiversity, Geodiversity and Nature Conservation and NEB3: Biodiversity Net Gain**

24. Section 2.1c of NEB sets out the statutory requirement for development to deliver a 10% net gain in biodiversity. The policy states that net gain should be delivered first and foremost onsite with offsite offsetting when required being delivered in a way that support agreed strategic nature recovery initiatives. The Council have then repeated this requirement in NEB3 but providing more detail as to the implementation of BNG.

25. Firstly, it is not necessary to repeat the need for development to achieve a 10% net gain and how this should be assessed and delivered. The HBF would suggest that bullet point 2c deleted from NEB2 as it is unnecessary repetition which is inconsistent with paragraph 16 of the NPPF. The policy broadly sets out what is required of development in relation to the statutory requirements. However, the HBF are concerned that part d does not give sufficient recognition to the fact that there is a hierarchy with regard to where BNG can be delivered that where it is not possible to deliver BNG locally then it can be offset anywhere in the country.

26. It is important to remember that developers are already encouraged to deliver as much gain on site or in the borough through the metric which increases the net gain required where

deliver offsite is outside of Borough and as such will increase the cost of delivering net gains. The HBF would therefore question whether it is necessary for the Council to state a preference within policy as to where gains should be delivered. However, if a preference is stated it must be recognised that:

- delivery of BNG in the relevant National Character Area (NCA) is considered within the metric to be the equivalent of delivering net gains locally. As such delivering offsite in the NCA but outside of the Borough should be recognised in the policy and given equal weight to local delivery.
- That offsite delivery outside of the Borough or NCA is acceptable if no capacity is available locally.
- That as a final resort development will be able to use national credits.

27. The Council also note in paragraph 5.26 that planning conditions or obligations may be used to ensure that a planning permission provides for works that will measurably increase biodiversity. These are not the only approaches that can be taken with developers able to enter into a conservation covenant with a responsible body.

#### **NBE8 Water Quality, Supply and Efficiency.**

28. The HBF do not consider part 8.3 of the policy to necessary and should be deleted. Paragraph 194 of the NPPF states that: *“The focus of planning policies and decisions should be on whether proposed development is an acceptable use of land, rather than the control of processes or emissions (where these are subject to separate pollution control regimes). Planning decisions should assume that these regimes will operate effectively.”* As such there is no need to reference the need for development to reference other environmental standards for waste water conveyance and treatment. These are addressed through other controls and regimes and as such are not part of the decision as to whether a development is an acceptable use of land.

29. Part 8.4 will require new development to achieve a water efficiency of no more than 95 litres per person per day (l/p/d). This is inconsistent with national policy on optional technical standards which allows LPAs to set an improved standard of 110 l/p/d where justified. The HBF do not contest the need for the lower water standard of 110 l/p/d to be applied in East Hampshire but to go beyond this is clearly inconsistent with what is allowed in national policy and should be amended accordingly.



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

30. This policy sets out that new development resulting in a net gain in residential units will be permitted where an application can demonstrate the development nutrient neutral or has approved on-site or offsite mitigation measures which result in the proposal becoming nutrient neutral. Whilst the HBF recognises the need for such policies in order to overcome the advice given by Natural England's we contend that the significance of the harm created by new home is minimal and that the Council as the competent authority is able to set aside this advice.
31. Research commissioned by the HBF<sup>1</sup> shows that the occupancy of new homes accounts for just 0.29% of total nitrogen emissions each year. The research also puts nutrient output from residential properties in the context of agricultural activities which is responsible for around 70% of the nitrogen that finds its ways into rivers and streams. The research found that each dairy cow in affected areas produces Nitrogen discharges equivalent to 29 homes while each sheep is responsible for the same amount of Nitrogen as three family homes. The report shows that agriculture accounts for 70% of the nitrogen released into our rivers, with the existing housing/population contributing 30% through discharges into the sewerage system with new housing would contribute 0.29% of this figure.
32. Housing makes such a negligible contribution to the pollution in our rivers we would question whether new housing is having a significant effect on the relevant protected habitats especially when compared to the impact farming practices clearly have with regard to the declining quality of our rivers. However, if the policy is to be retained, the HBF disagrees the Council's use of a 2.4 people as the average household size in new homes within the nutrient budget calculator. Other areas, for example the affected LPAs in Norfolk, have undertaken research that shows the net additional population new household is much smaller than the 2.4 average used by the Council. This is because not all new homes are occupied by people moving to the area. Some will already be living in the area and are purely creating new households not new residents in the area. Research commissioned by the HBF<sup>2</sup> from Lichfield's shows that the net additional average household size in the catchment areas impacting on the Solent is just 1.67. This is significantly lower and should be used in the calculator and referenced in the local plan to confirm it as the level of additional growth per household adopted by the Council.

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<sup>1</sup> <https://www.hbf.co.uk/news/nutrient-pollution-review/>

<sup>2</sup> <https://www.hbf.co.uk/news/nutrient-neutrality-lichfields-report-unblocking-homebuilding/>

## **DES1: Well-designed Places**

33. Part G requires development to take into account how the delivery of services may change over time. It is not clear to the HBF how a developer or decision maker can accurately consider this policy. It is not known how service delivery may change over time with any assessment on behalf of the developer or decision maker being guess work making the policy ineffective. The phrase should be deleted.

## **HWC1: Health and Wellbeing of Communities**

34. Part 1.2 of this policy requires all residential development of 50 homes or more to undertake a Health Impact Assessment (HIA). Whilst the HBF would agree that they are an essential part of plan making to ensure the Council understand the health outcomes it is seeking to achieve and creates a plan that seeks to deliver these. This should be achieved through the preparation of a whole plan HIA which will inform the Council that the policies it contains address the key health outcomes for the area. As the plan and the policies, it contains has been prepared to address the key health issues it is therefore unnecessary for future development proposals that accord with this plan to undertake a separate HIA. If a development meets the policies in the plan, then it is by default addressing the health outcomes already identified by the Council. An HIA as part of the application would merely be repetition of the work the council has already undertaken. The only circumstance where an HIA may be appropriate would be for a larger unallocated site where the impacts may not have been fully considered by the council as part of the plan wide HIA.

## **DGC1 Infrastructure**

35. Part 1.2 of this policy requires development proposals to consider all the infrastructure implications of a scheme not just those on site or its immediate vicinity. This is general statements masks the fact that the implementation of this policy could go beyond the requirements of what a planning authority can consider with regard to some infrastructure when making land use planning decisions. This concern is confirmed in paragraph 8.18 which states that developers will be required to demonstrate that there is adequate waste water capacity and surface water drainage both onsite off site to site to serve the development.

36. The HBF do not consider this to be necessary as the capacity of the sewage network are not a land use planning matter for consideration on an application by application basis as Water companies are subject to statutory duties under S37 and 94 of the Water Industry Act 1991 (WIA 1991). Section 37 of the Act, set out below, imposes a statutory duty on all water companies to provide and maintain adequate infrastructure and potable water supplies.

*“S37 General duty to maintain water supply system etc.*

*(1) It shall be the duty of every water undertaker to develop and maintain an efficient and economical system of water supply within its area and to ensure that all such arrangements have been made—*

*(a) for providing supplies of water to premises in that area and for making such supplies available to persons who demand them; and*

*(b) for maintaining, improving, and extending the water undertaker’s water mains and other pipes, as are necessary for securing that the undertaker is and continues to be able to meet its obligations under this Part.*

*(2) The duty of a water undertaker under this section shall be enforceable under section 18 above—*

*(a) by the Secretary of State; or*

*(b) with the consent of or in accordance with a general authorisation given by the Secretary of State, by the Director.”*

37. Section 106 of the WIA 1991 confers a power to connect to a public sewer. Section 106(1) states that the owner of any premises or the owner of any private sewer which drains premises, shall be entitled to have its drains or sewer communicate with the public sewer of any sewerage undertaker and therefore discharge foul water and surface water from those premises or that private sewer.

38. Specifically, in relation to wastewater, the Supreme Court considered this matter in 2009 – see *Barratt versus Welsh Water* [2009] UKSC 13. Paragraph 23 of the decision is salient. Given its importance in the context of wastewater it is recited in full below:

*“The right to connect to a public sewer afforded by section 106 of the 1991 Act and its predecessors has been described as an “absolute right”. The sewerage undertaker cannot refuse to permit the connection on the ground that the additional discharge into the system will overload it. The burden of dealing with*

*the consequences of this additional discharge falls directly upon the undertaker and the consequent expense is shared by all who pay sewerage charges to the undertaker. Thus, in Ainley v Kirkheaton Local Board (1891) 60 LJ (Ch) 734 Stirling J held that the exercise of the right of an owner of property to discharge into a public sewer conferred by section 21 of the 1875 Act could not be prevented by the local authority on the ground that the discharge was creating a nuisance. It was for the local authority to ensure that what was discharged into their sewer was freed from all foul matter before it flowed out into any natural watercourse.”*

39. Consequently, it is inappropriate to include a policy in the local plan requiring a housebuilder, or other applicants for development, to assess the capacity or otherwise of the water company to provide water supply and wastewater connections as they are an attempt to get applicants to do things for which they are not legally responsible. This policy must be clear that for services where there is a statutory requirement for the provision of these services then this is not a matter for the decisionmaker at the point of application.
40. Rather it is the responsibility of water companies, working with local authorities and the Environment Agency, to plan for the future demand for water services relating to the development requirements proposed in local plans, not applicants. If the water company is unable to supply those needs, this needs to be disclosed in the Water Resource Management Plan (WRMP). If unforeseen events occur after the WRMP is adopted, meaning that the water company is now unable to provide the water services required, then the local authority must reflect those problems in its local plan. HBF recognises that this could represent a significant barrier to the delivery of the local plan. It might even mean that the development requirements cannot be delivered, either in part or in their entirety.

## **DCG2: Sustainable Transport**

41. Part 2.1 of this policy defines suitable locations are those that are in an accessible distance to enable local living. However, no guidance is provided as to what an accessible distance is and therefore how a developer or decision maker would consider this policy in relation to a development. The Council should avoid such general terms in relation to accessibility and provide clearer guidance as to what is considered to be an accessible distance.

## **H1: Housing Strategy**

42. The HBF's comments on housing needs and supply are set out in response to policy S1 and apply to much of what is set out in H1 and its supporting text. As set out in those comments the HBF are concerned that the Council has not taken full account of the unmet needs that will arise in the parts of EHDC in the SDNPA or in other areas of the PfSH area. In addition, the buffer in supply of around 6% is too small to provide a sufficient confidence that needs can be met over the plan period. As the council note in paragraph 9.18 further sites should be allocated to ensure a buffer of between 10-15%.

## **H2: Housing Mix and Type**

43. Par 2.4 states that a proportion of affordable homes may be required to provide wheelchair accessible homes where there is evidence that this is needed locally. This approach is not unreasonable however the HBF would suggest that following where evidenced by local need the council insert "*and is viable and feasible*". This would ensure that there is sufficient flexibility in the policy to take account of those situations where it is not viable, or it is physically impractical for such a home to be built to part M4(3). We note that the Council's viability study sets the cost of delivering a home to part M4(3) at £115 per sqm. However, the study also fails to recognise the difference between part M4(3)a and M4(3)b. The cost of delivering the later is significantly higher. As to how much the cost of these should be the HBF have seen similar studies which estimate the cost to be between £13,000 and £30,000 per dwelling depending on which standard is used.

## **H3: Affordable Housing**

44. The HBF has concerns that the Council have not tested the full costs arising from this local plan. In particular the cost of delivering net zero carbon homes is far too low and could in combination with the other policies in the plan make development unviable. The Council will need to produce an updated viability assessment to fully consider the cost of delivering new homes under this local plan.

## **H5: Specialist Housing**

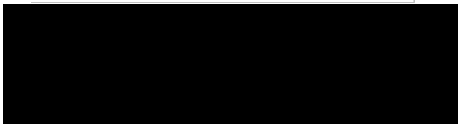
45. The HBF would consider such an approach to be ineffective in meeting the specialist accommodation needs for older people across Basingstoke. The most effective approach

to meeting the housing needs of older people is for the Council to allocate sites within the local plan for retirement housing and other specialist accommodation for older people. Given the competition for sustainably located sites will be high, allocation is the most effective way in ensuring such development will come forward over the plan period. The HBF would also recommend that the Council include within the policy the amount of specialist accommodation required to meet the needs of different groups within EHDC. Whilst this is not specifically required by national policy the HBF consider it necessary in order to be make the policy effective. If no indication is provided as to what is needed, then it is not possible for decision makers to effectively apply this policy or for the council to monitor it effectiveness.

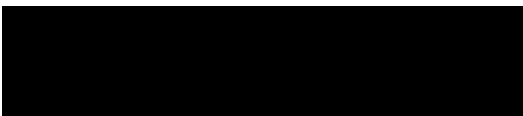
### **Future engagement**

46. I trust that the Council will find these comments useful. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry if that would helpful. The HBF would like to be kept informed of the progress and adoption of the Local Plan. Please use the contact details provided below for future correspondence.

Yours faithfully



Home Builders Federation



## Lynchmere Parish Council East Hants local plan consultation comment

Tue 05/03/2024 18:03

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.

Lynchmere Parish Council would like to make the following observations about the East Hants Local Plan Consultation for Liphook as we are the neighbouring Parish.

1. Should the plan to develop the Chiltley Farm site LIP3 go ahead we request that there is no vehicle access from it onto Chiltley Lane and Devils Lane as that is a very narrow road and the turn on to Highfield Lane is dangerous.
2. Vehicle access from the LIP1 site on the B2131 which proposes 24 houses should be as far away from the railway bridge as possible. There is already very heavy traffic on the B2131 from previous developments in Liphook and Bordon. Many commuters use this route to access station parking at Haslemere. We would prefer it if measures can be put in place in the East Hants Local Plan to limit a further increase in traffic coming along this route through Lynchmere Parish. We also have doubts about the suitability of housing development on this site as we believe it is designated as a River Wey conservation area.
3. We are aware of concerns expressed in response to your draft Local Plan about more problems with flooding and sewage from further housing development in Liphook. Sewage spills and more frequent flooding around the River Wey are already adversely affecting our Parish. Fair and foul water discharges from developments being built around Sturt Road in Haslemere are also a threat to the river and its immediate environment. These problems are likely to continue to affect the river downstream as it flows through Liphook and we ask that you take them into account.

Lynchmere Parish Council

[www.lynchmere-pc.gov.uk](http://www.lynchmere-pc.gov.uk)

Office hours: Tuesday, Wednesday & Thursday 9am-5pm

c/o Secretary,  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

Email: [REDACTED]

3<sup>rd</sup> March 2024

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

Dear Sirs,

## Draft Local Plan 2021-2040 (Regulation 18) Consultation

### Response submission from Medstead & Four Marks Neighbourhood Plan

Please find attached the submission from the Medstead and Four Marks Neighbourhood Plan Steering Group, (NSPG), in response to the (Regulation 18) Consultation on the EHDC *Draft Local Plan 2021-2040*.

The NSPG 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 NSPG 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 NSPG 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 main points must be addressed and agreed.

1. The NSPG 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 NSPG, 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 NSPG 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 NSPG 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)<sup>1</sup>, is accepted. It places Four Marks/ 'South Medstead' in Tier 4, before

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



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' <sup>2</sup>.

*" 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.

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*

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

<sup>2</sup> **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>

*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 NSPG 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 NSPG 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.

The NSPG is looking forward to working with EHDC Planning Policy Team to resolve the above points, thus allowing the NSPG to fully support the Draft Local Plan 2021-2040 (Regulation 19) documentation; and therefore will anticipate making its recommendation to the Examiner for its acceptance.

Yours faithfully,

██████████

████████████████████

**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)*<sup>1</sup>, 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'* <sup>2</sup>.

*" 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.

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<sup>1</sup> 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>

<sup>2</sup> 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 CO<sub>2</sub> 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 CO<sub>2</sub> emissions due to transport (43%)<sup>3</sup>.

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

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<sup>3</sup> 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*<sup>4</sup> 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*<sup>5</sup> 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

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<sup>4</sup> 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>

<sup>5</sup> 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 NSPG 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* <sup>6</sup> 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 <sup>17</sup>) identifies that Grayshott has 2 sites on the LAA:

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<sup>6</sup> 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>

<sup>7</sup> 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 NPSG 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*<sup>8</sup>.

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:

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<sup>8</sup> 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](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.<sup>9</sup>

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*<sup>9</sup>, 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.

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<sup>9</sup> 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, 15<sup>th</sup> 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 Exchange<sup>2</sup> (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 Road<sup>3</sup> (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.

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

<b>2.1 The effect of the SDNP on area outside the SDP</b>			
<b>2.1.1 What percentage</b>		<b>MINUS</b>	<b>Difference</b>
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	<b>-1.177</b>
<b>2.1.2 Allocation within the SDNP</b>			
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	<b>266</b>
<b>2.2 The Affordability Ratio</b>			

<b>2.2.1. Fundamental flaw</b>			
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.			
<b>2.2.2 Work-place based calculation</b>			
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
<b>2.2.3 The SDNP effect</b>			
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			
<b>3. The Buffer</b>			
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
		<b>DLP</b>	<b>NPSG</b>
<b>Actual housing need</b>		9,082	<b>7,164</b>
existing planning permission granted in Mar 2023: 3,965		-3,965	<b>-3,965</b>
Section 3.25 completions April 2021 to March 2023: 940		-940	<b>-940</b>
Windfalls expected: 1,320		-1,320	<b>-1,320</b>
<b>Total to be built in this plan period</b>		<b>2,857</b>	<b>939</b>
Declared number of dwellings required declared in the Draft Local Plan		<b>3,500</b>	
<b>Conclusion, EHDC are allocating sites for more than 5 times as many sites as are needed.</b>			

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*<sup>10</sup> 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 minutes<sup>11</sup> 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

<sup>10</sup> UK Govt National Model Design Code

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

<sup>11</sup> **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](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*<sup>12</sup> 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.

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<sup>12</sup> **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* <sup>13</sup>April 2022, and include the good work it has previously produced.

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<sup>13</sup> 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 2022<sup>14</sup>, 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*

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<sup>14</sup> 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*<sup>15</sup>, 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*<sup>16</sup>.

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<sup>15</sup> 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>

<sup>16</sup> 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.

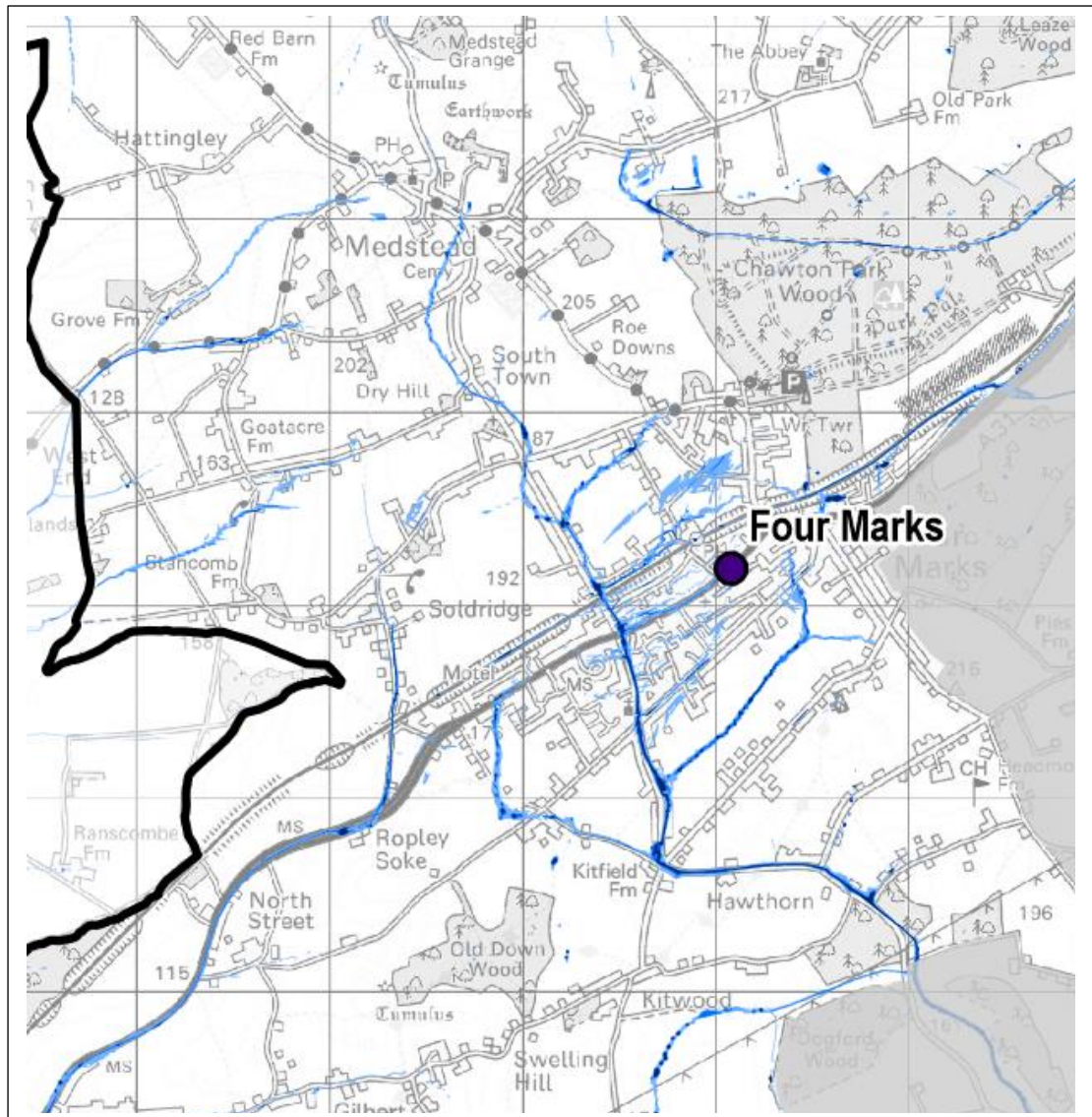


Figure 10a Risk of Flooding from Surface Water Map covering the north of the District.

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*<sup>17</sup>); 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.

<sup>17</sup> 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](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.

<b>3<sup>18</sup> Provide a new strategic semi-natural greenspace in the northwest of the District</b>	
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 <b>address deficiency of natural &amp; semi-natural open space.</b>
Approximate location	
Potential Interventions	<ul style="list-style-type: none"> <li>• Identify sites for a new semi-natural green space in the north-west sub-region.</li> <li>• Locate open space in proximity to Alton or Four Marks to capitalise on development</li> <li>• Establish links to open space through proposed development.</li> <li>• Encompass existing blocks of woodland within the park area to offer a diverse recreational experience.</li> <li>• Implement biodiversity enhancements and establish management plan to ensure long-term ecological value.</li> <li>• Implement woodland to screen development where appropriate.</li> <li>• Connect with existing strategic public rights of way.</li> </ul>

<sup>18</sup> 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"> <li>Adopt a community led design process in the development of the open space and adopt volunteers through construction.</li> </ul>	
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*<sup>19</sup>(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 CO<sub>2</sub> 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 CO<sub>2</sub> 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:

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<sup>19</sup> 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. NSPG 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 NSPG 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 distant<sup>20</sup>, supported by the NMDC<sup>21</sup>, (*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.

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<sup>20</sup> 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.

<sup>21</sup> 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 Waling 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 CO<sub>2</sub> 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 Judgement<sup>22</sup> 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:

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<sup>22</sup> **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](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 NOX 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*<sup>23</sup> 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*<sup>24</sup>, 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.

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

<sup>24</sup> 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**

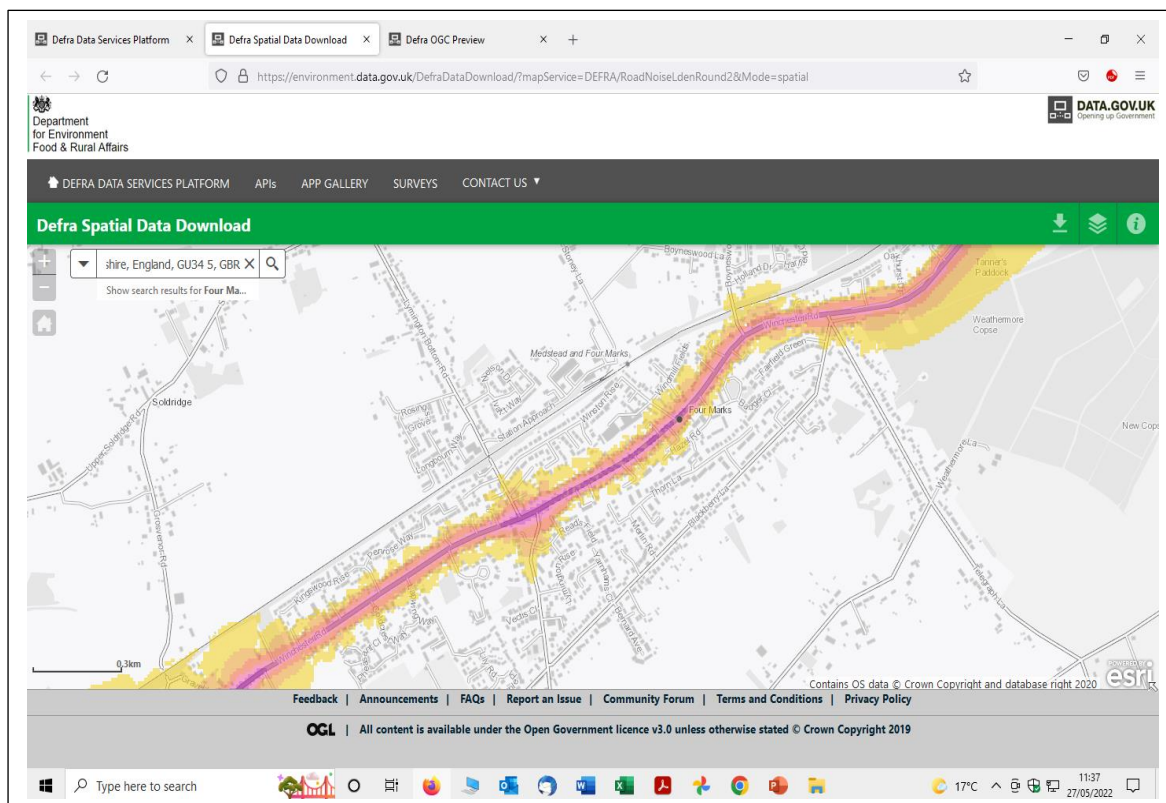
**Policy DM22: Equestrian and stabling development**

**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*

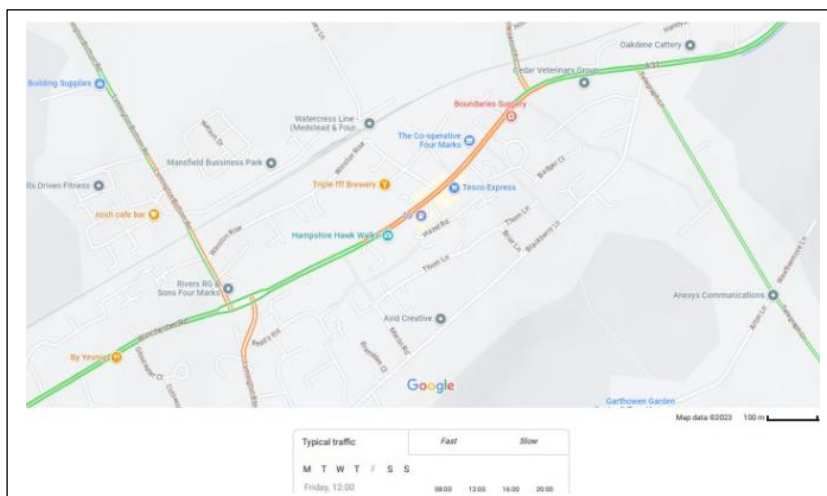
This map shows data indicating the level of noise according to the strategic noise mapping of road sources within areas with a population of at least 100,000 people (agglomerations) and along major traffic routes.

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 CO<sub>2</sub> and NO<sub>x</sub> 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*<sup>25</sup>, 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 Bottom<sup>26</sup>, 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.

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

<sup>26</sup> 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](https://planningpublicaccess.easthants.gov.uk/online-applications/applicationDetails.do?keyVal=EHANT_DCAPR_254025&activeTab=summary)

## The NSPG note that some

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 NSPG 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 NSPG 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 NSPG 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*<sup>27</sup> 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*<sup>28</sup>.

<sup>27</sup> 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>

<sup>28</sup> 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.

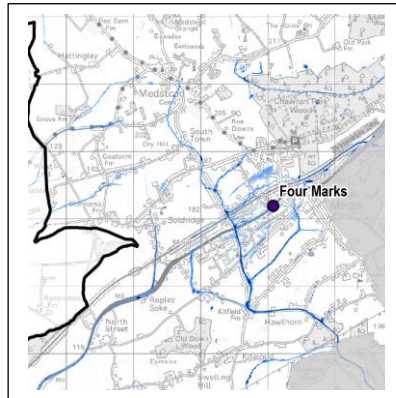
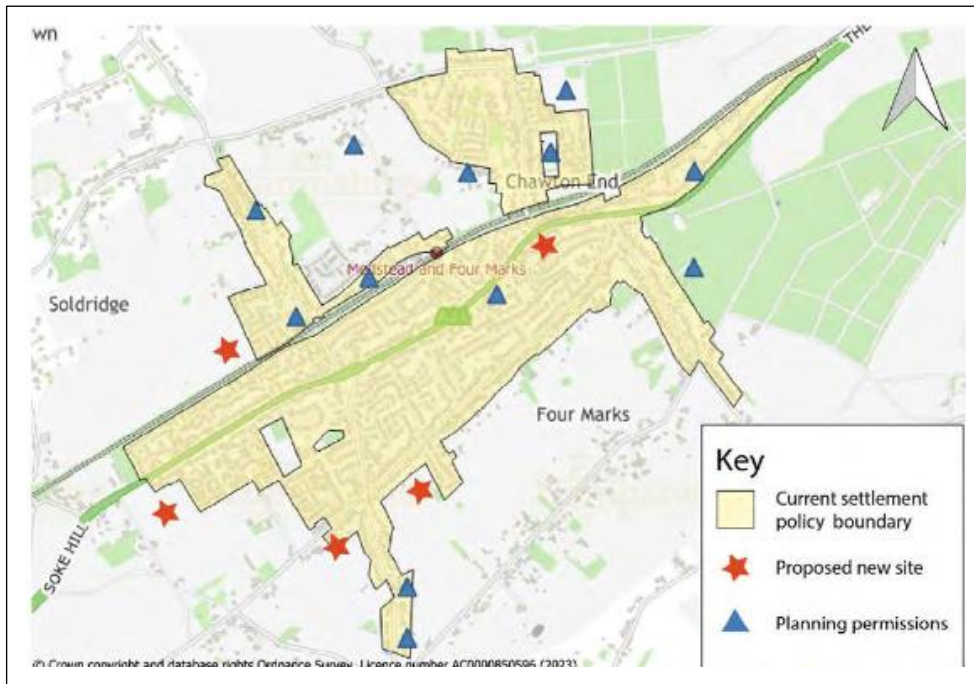


Figure 10a Risk of Flooding from Surface Water Map covering the north of the District.

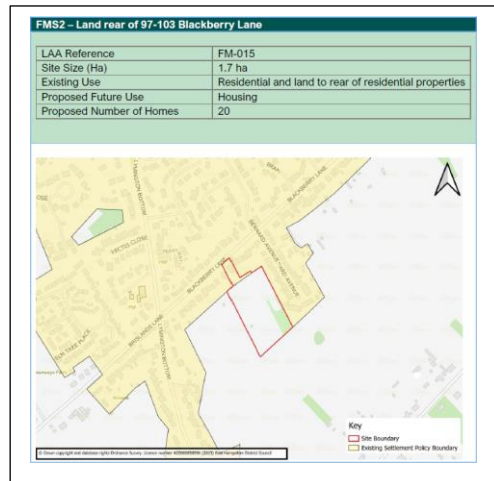
**Four Marks**



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 8<sup>29</sup>.



### 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 :



<sup>29</sup> 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

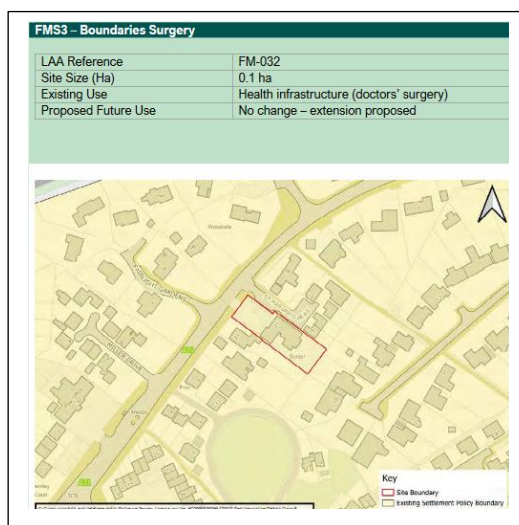
With no 5 Year Land Supply this site could increase speculative development on adjacent land in immediate vicinity being granted permission due to the ability for cycle and pedestrian access between sites.

### 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/m<sup>2</sup>/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 21<sup>30</sup>.



<sup>30</sup> 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**

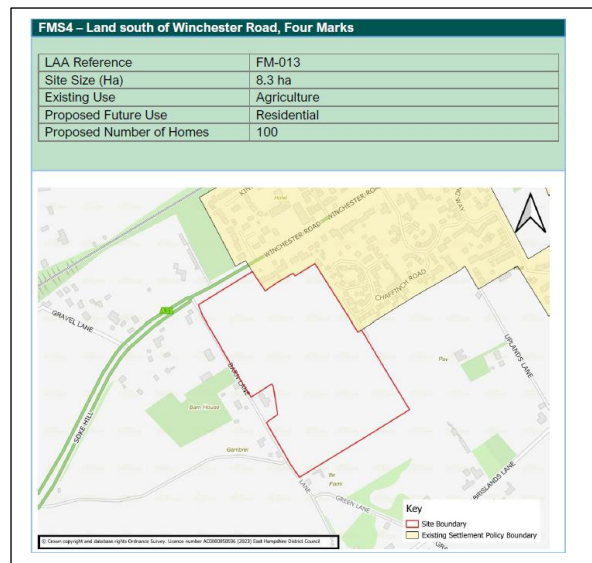
This site is in the centre of the settlement.

**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 11<sup>31</sup>.



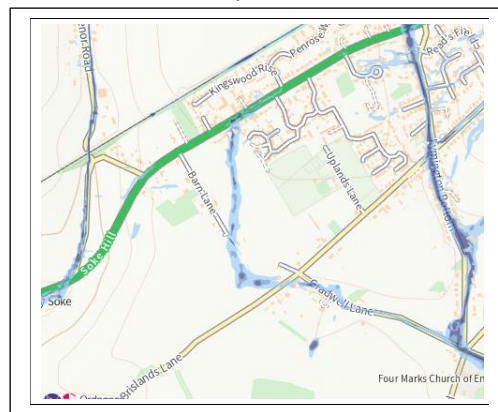
**Pros**

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:



<sup>31</sup> 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.

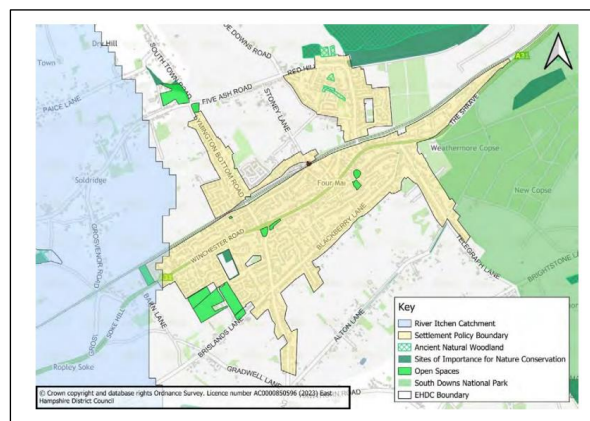
Long way from village centre, unless a convenience store is included on the Winchester Road Frontage

## PC & NP requirements to be able to support an application from this allocated Site

Community infrastructure provided :

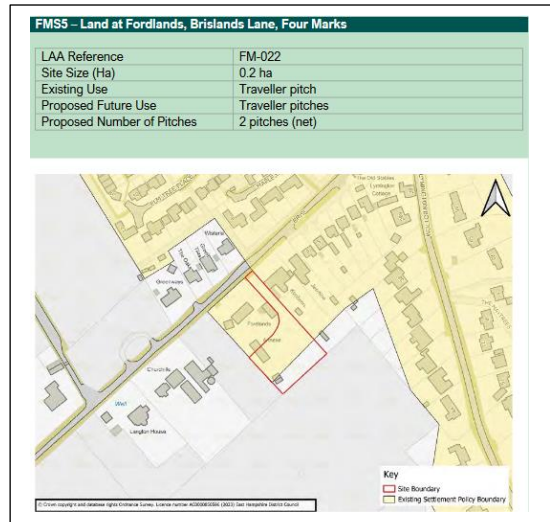
- Multi-purpose community building in close proximity to Four Marks Recreation Ground or enhancement of existing provision (Benians Pavilion).
- A shop with adequate parking which is visible and directly accessible from the A31 to catch passing trade. Any shop would need to have good visibility in order 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/m<sup>2</sup>/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 10<sup>32</sup>.



### 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.

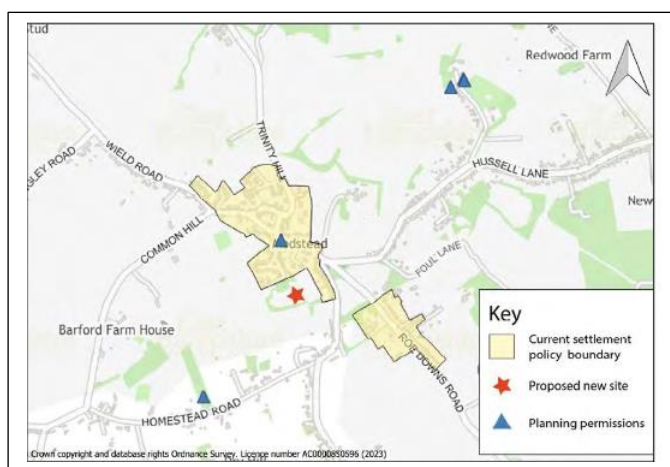
### Cons

It is some distance from the facilities at Oak Green Parade.

## Medstead

### Medstead Village

### Current Planning Applications and Proposed Allocations – Medstead



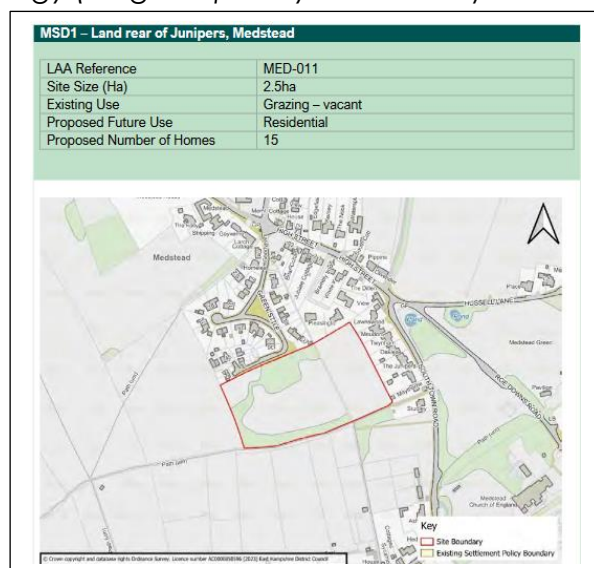
<sup>32</sup> Source of Data EHDC Portal: Draft Local Plan 2021 to 2028 Reg 18 Consultation. . East Hampshire Living Locally Accessibility Study and Decide & Provide Methodology (Ridge Report 1) Chapter 5: Table 5.5 – Sites not within 400m of a Regular Bus Service Bus Stop or an LCWIP Scheme p53  
<https://www.easthants.gov.uk/sites/default/files/2024-01/Report%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 14<sup>33</sup>.



#### 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

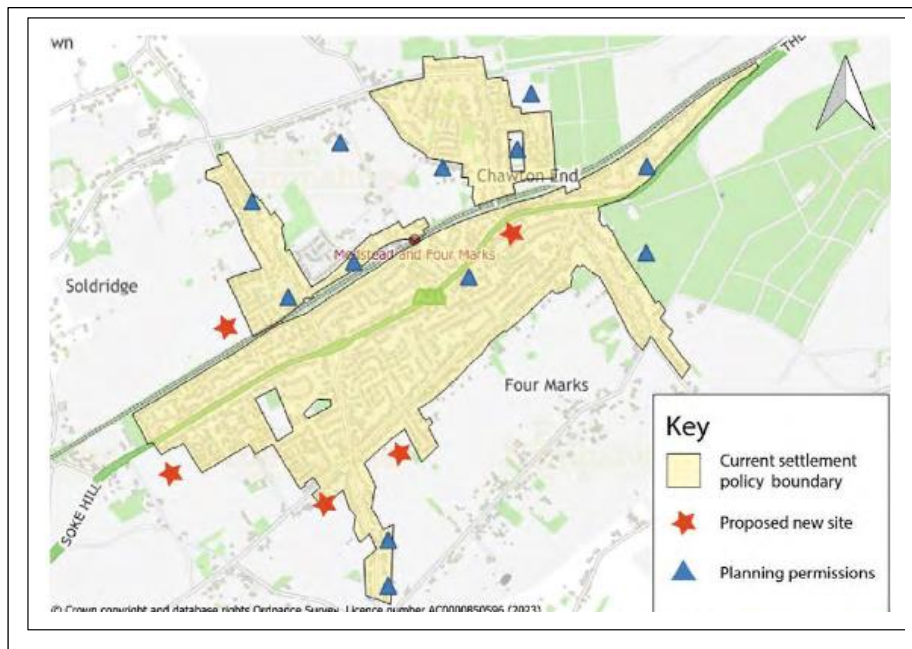
This site is supported by MPC as it will sustain the life of the village

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/m<sup>2</sup>/yr as a minimum, and on site generation ( PV ) must use all available roof space.

<sup>33</sup> 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>

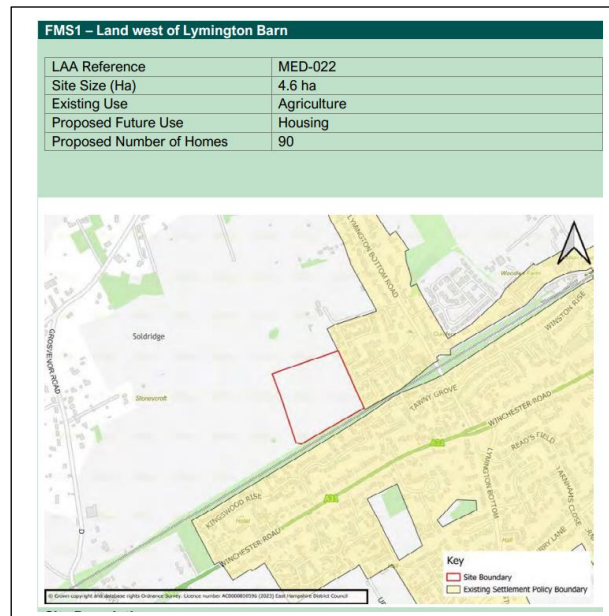
## 'South Medstead'



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 8<sup>34</sup>.



<sup>34</sup> 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 which will prevent vehicles from taking 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.

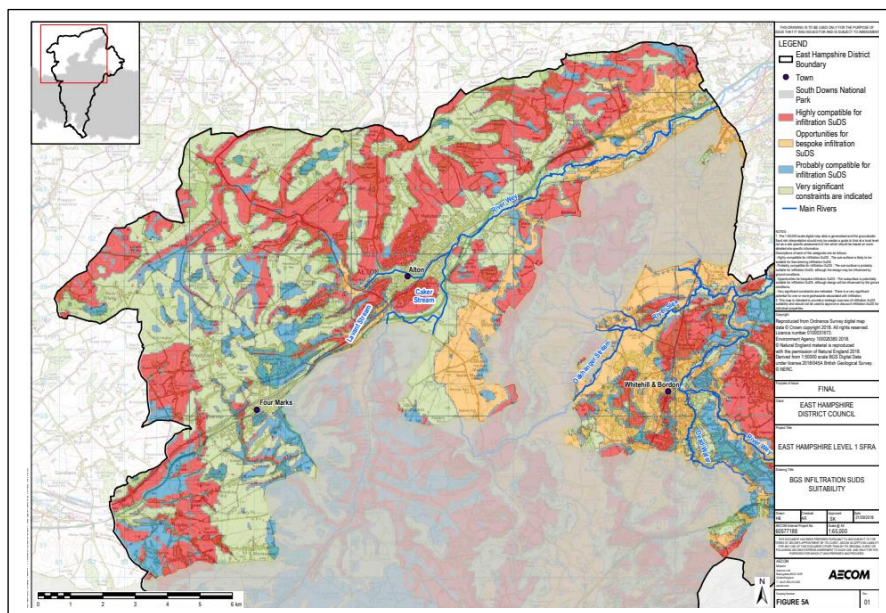
The access road for both pedestrians and road users is currently dangerous. There have been at least 3 accidents there and residents have reported numerous near misses (including dash cam footage). The NPSG questions if the current discussions regarding improvements to the road will result in sufficient 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.

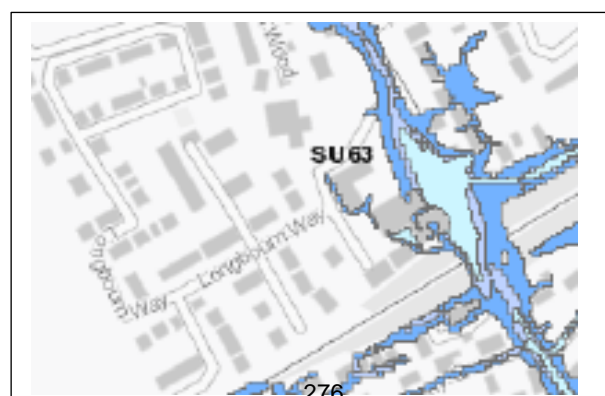
It will cause the loss of Grade 3 agricultural land which is obviously a finite resource.

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:



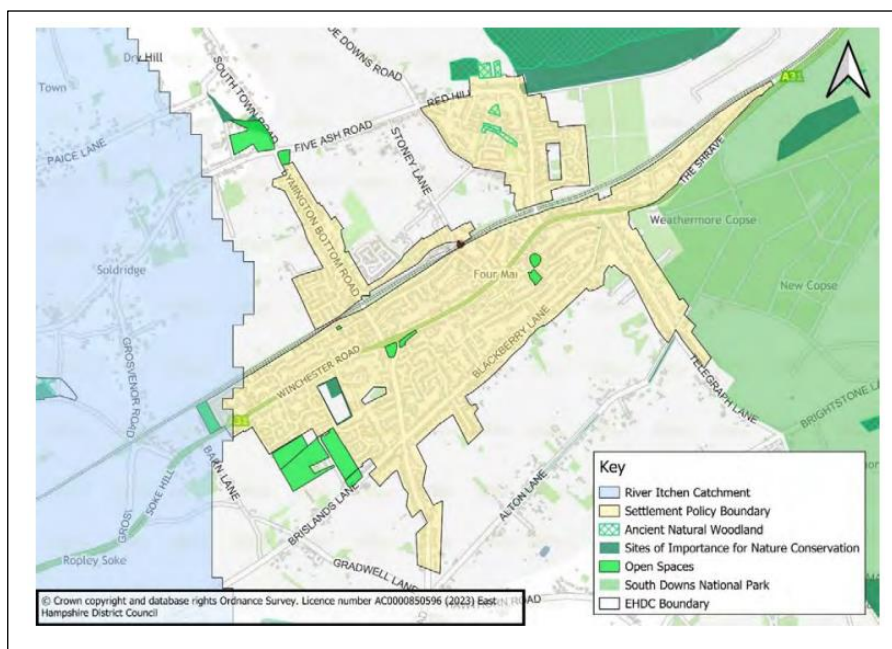
The additional effects of surface water flooding the adjacent estate due to land topography is a real concern, especially as Lymington Bottom Road floods together with the access to the greengrocer 'Clementines'.

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<sup>o</sup> 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.

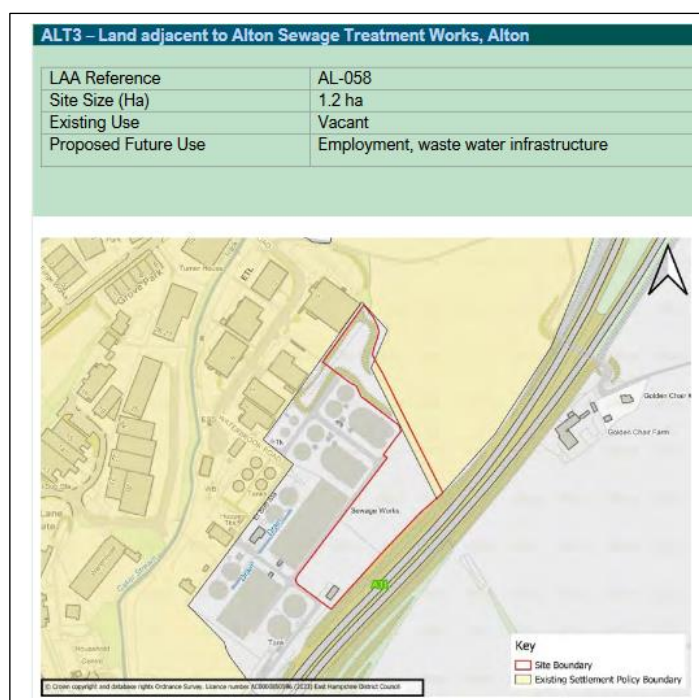
However, should the site be considered as an Allocated site:

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/m<sup>2</sup>/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*



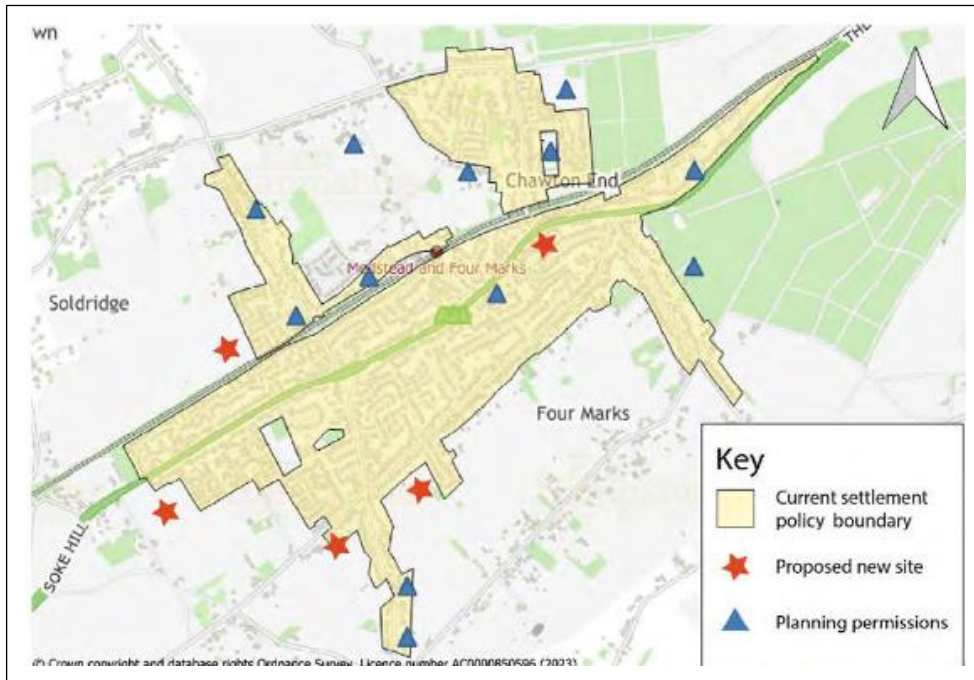
The NPSG is greatly concerned that the removal of expansion land from the WTW will affect the future needs of Alton and the villages to the North South and west that whose foul water is currently processed by the site.

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 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.

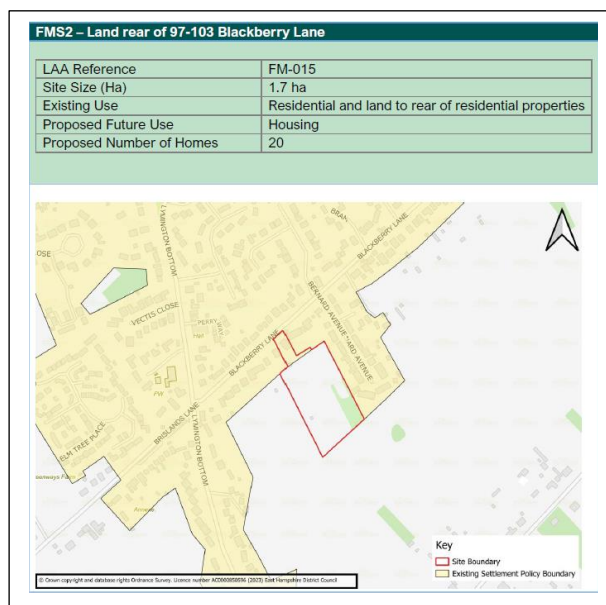
## APPENDIX 12A SITE ALLOCATIONS<sup>35</sup>

### 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



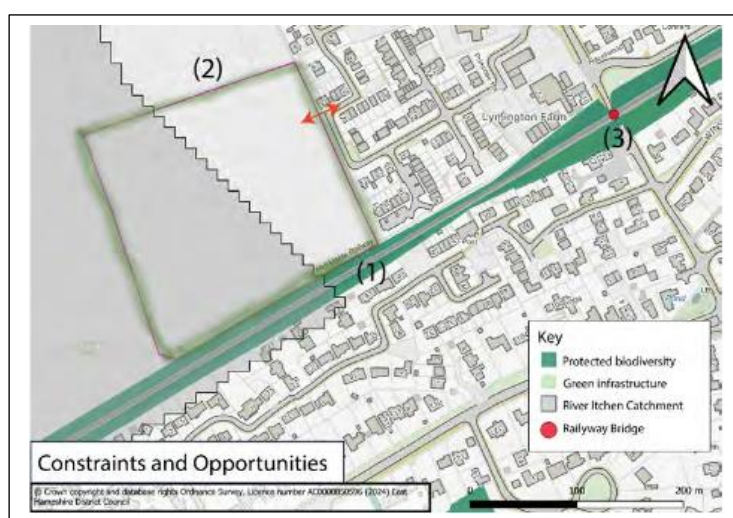
<sup>35</sup> Source of Data EHDC Portal: Draft Local Plan 2021 to 2028 Reg 18 Consultation. Chapter 12 <https://www.easthants.gov.uk/media/8744/download?inline>



## 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.*

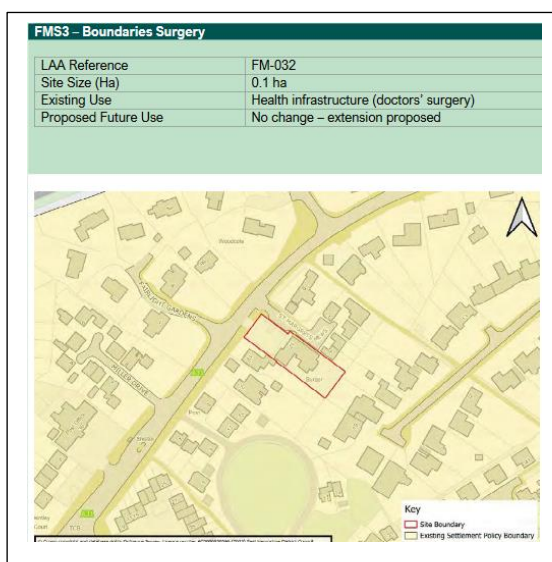
### Summary of Reasons for Inclusion

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

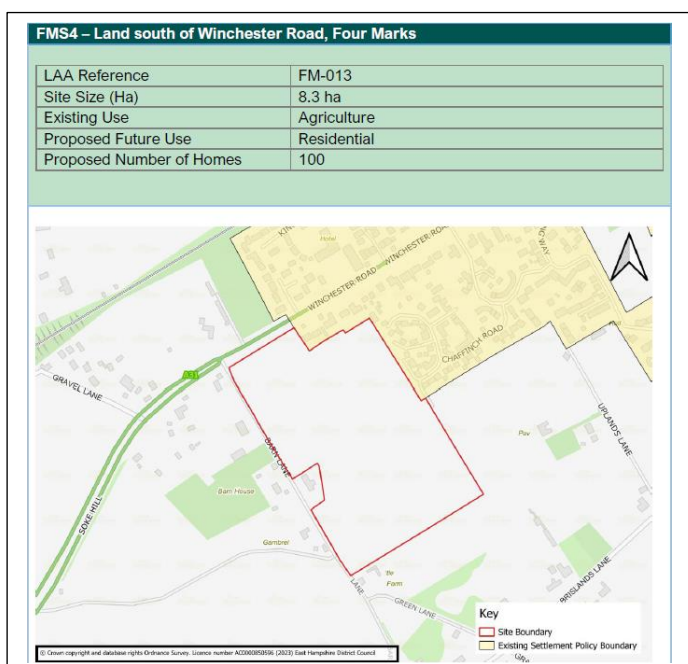
Boundaries Surgery is a key health facility in Four Marks. It is currently over-capacity and population growth would exacerbate this further. A small extension to the rear of the surgery, coupled with internal reconfiguration would enable this surgery to expand its clinical space to meet the healthcare 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.

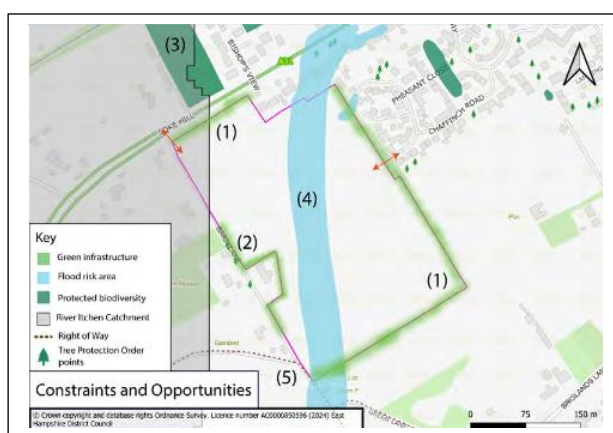
## FMS4 Land South of Winchester Road



## 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**

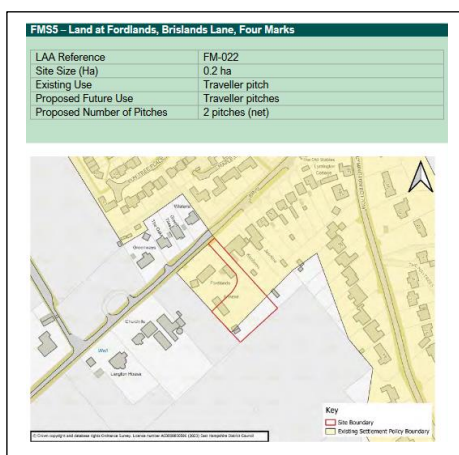
*The site is relatively well-located for local services and facilities in southern and western Four Marks, including the recreation ground, allotments and a primary school; although it is distant from the local centre. The site scores above average in the Local Planning Authority's Accessibility Study. 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



### 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.

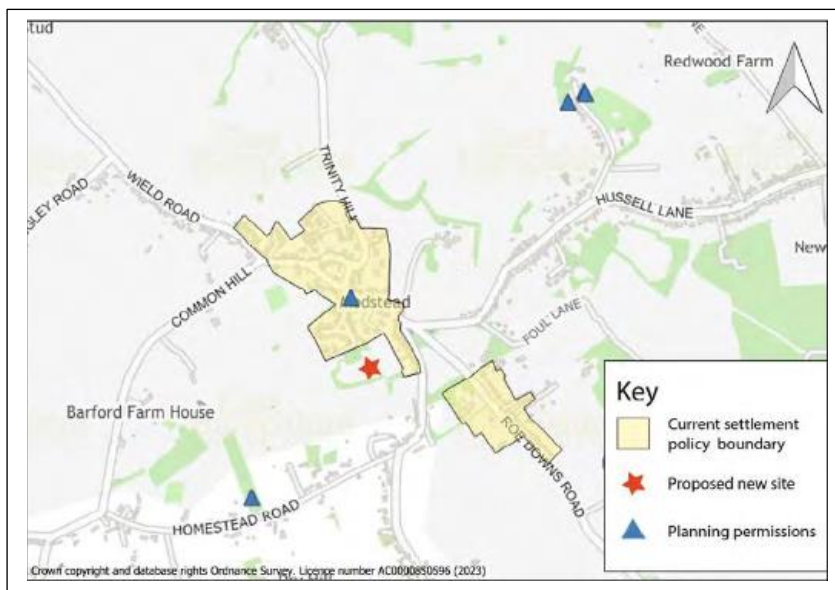
### Infrastructure Requirements

- 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

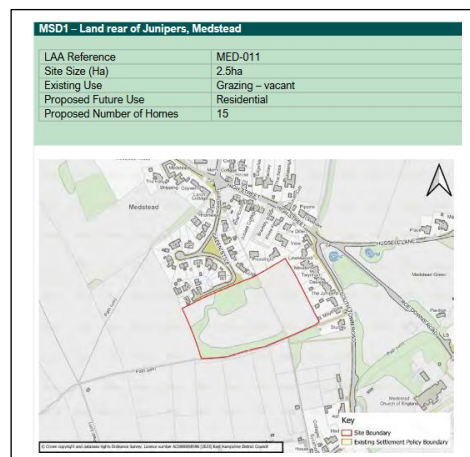
### Medstead Village

#### 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

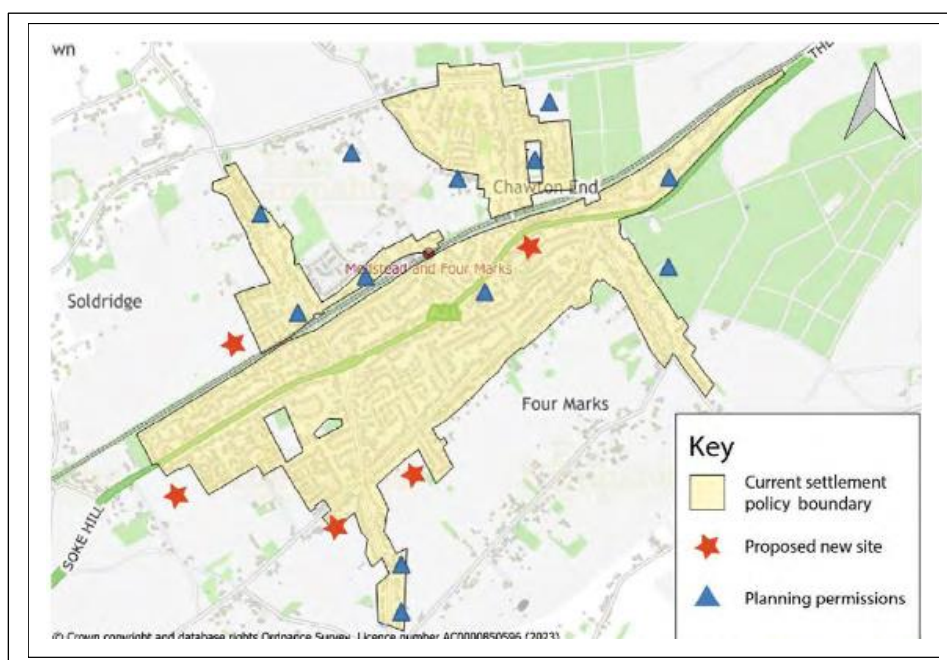


leaving any valuable habitats free of development and by leaving a suitable buffer of open space or landscaping between buildings and mature green infrastructure. Augmenting green infrastructure on the site's eastern boundary could to<sup>36</sup> avoid adverse impacts on residential amenity. New vehicular 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.**

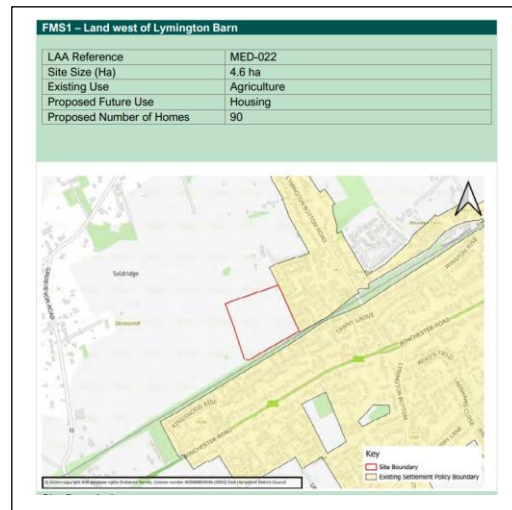
### 'South Medstead'



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

<sup>36</sup> Direct quote from the DLP.

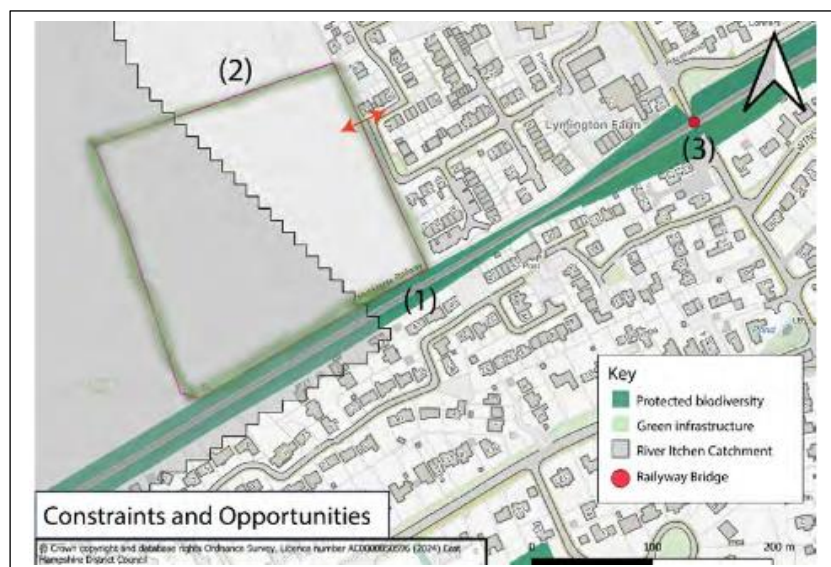
## FMS 1 Land West of Lymington Barns



### 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.

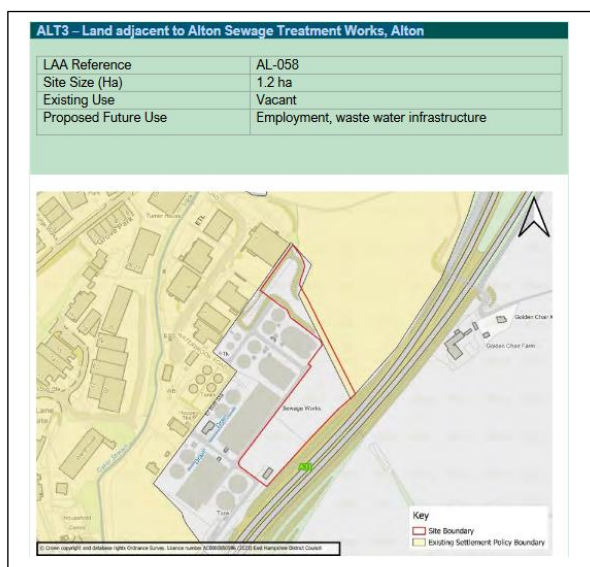
- On-site drainage: Significant constraints have been indicated for infiltration sustainable drainage systems. Appropriate infrastructure will be required to mitigate flood risks.
- Cumulative pressures of development on local infrastructure will be dealt with via CIL.

### 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:

<b>Housing Background Paper<sup>37</sup></b>	<b>13. 1</b>
<b>Gaps Between Settlements Background Paper<sup>38</sup></b>	<b>13. 2</b>
<b>Interim Settlement Policy Boundary Review Background Paper<sup>39</sup></b>	<b>13. 3</b>
<b>Meeting the Accommodation Needs of Gypsies, Travellers and Travelling Showpeople 2024 Background Paper<sup>40</sup></b>	<b>13. 4</b>
<b>Io<sup>41</sup></b>	<b>13. 5</b>
<b>Including:</b>	
<ul style="list-style-type: none"> <li>• <i>East Hampshire Living Locally Accessibility Study and Decide &amp; Provide Methodology (Ridge &amp; Partners Report 1)<sup>42</sup>, and</i></li> <li>• <i>East Hampshire Living Locally Accessibility Study and Decide &amp; Provide Methodology (Ridge &amp; Partners Report 2)<sup>43</sup></i></li> </ul>	
<b>Transport Background Paper<sup>44</sup></b>	<b>13. 6</b>
<b>EHDC Local Cycle and Walking Infrastructure Plan Technical Report<sup>45</sup></b>	<b>13.7</b>
<b>Policy Maps<sup>46</sup></b>	<b>13.8</b>

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<sup>37</sup> EHDC Portal: EHDC DLP Supporting Papers: **Housing Background Paper**

<https://www.easthants.gov.uk/media/8737/download?inline>

<sup>38</sup> EHDC Portal: EHDC DLP Supporting Papers: **Gaps Between Settlements Background Paper**

<https://www.easthants.gov.uk/media/8736/download?inline>

<sup>39</sup> 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>

<sup>40</sup> 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>

<sup>41</sup> 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>

<sup>42</sup> 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>

<sup>43</sup> 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>

<sup>44</sup> EHDC Portal: EHDC DLP Supporting Papers: **Transport Background Paper**

<https://www.easthants.gov.uk/media/8773/download?inline>

<sup>45</sup> EHDC Portal: EHDC DLP Supporting Papers: **EHDC Local Cycle and Walking Infrastructure Plan Technical Report**

<https://www.easthants.gov.uk/media/6035/download?inline>

<sup>46</sup> 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.

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

<b>2.1 The effect of the SDNP on area outside the SDP</b>			
<b>2.1.1 What percentage</b>		<b>MINUS</b>	<b>Difference</b>
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
			<b>-1.177</b>
<b>2.1.2 Allocation within the SDNP</b>			
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	<b>266</b>

<b>2.2 The Affordability Ratio</b>			
<b>2.2.1. Fundamental flaw</b>			
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.			
<b>2.2.2 Work-place based calculation</b>			
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	<b>- 214</b>
<b>2.2.3 The SDNP effect</b>			
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	<b>- 150</b>
Minor buffer			

<b>3. The Buffer</b>		
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	<b>-643</b>
	<b>DLP</b>	<b>NPSG</b>
<b>Actual housing need</b>	9,082	<b>7,164</b>
existing planning permission granted in Mar 2023: 3,965	-3,965	<b>-3,965</b>
Section 3.25 completions April 2021 to March 2023: 940	-940	<b>-940</b>
Windfalls expected: 1,320	-1,320	<b>-1,320</b>
<b>Total to be built in this plan period</b>	<b>2,857</b>	<b>939</b>
Declared number of dwellings required declared in the Draft Local Plan	<b>3,500</b>	
<b>Conclusion, EHDC are allocating sites for more than 5 times as many sites as are needed.</b>		

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.

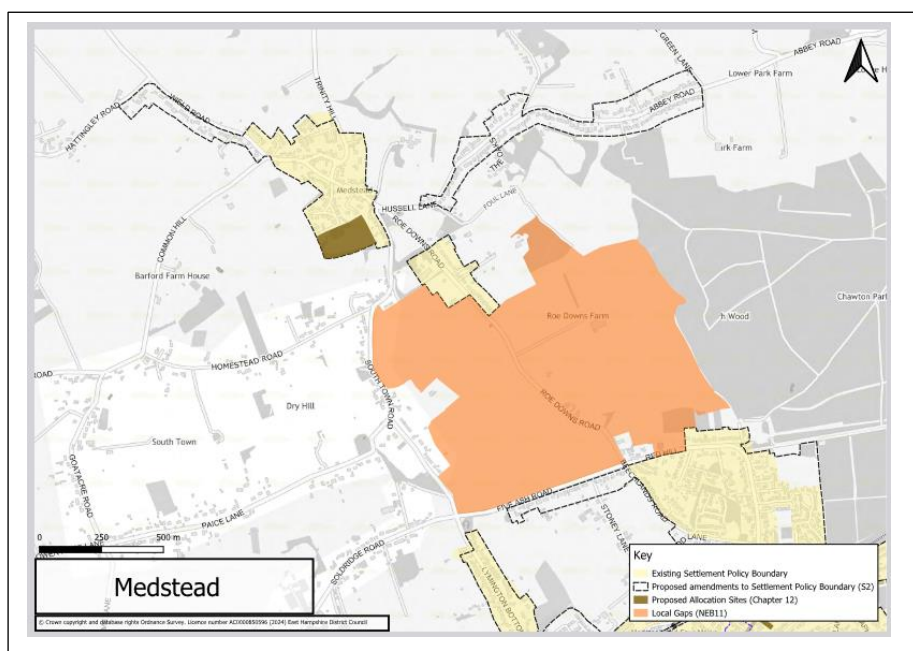


Fig Medstead Policy Map Showing the local Gap

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.

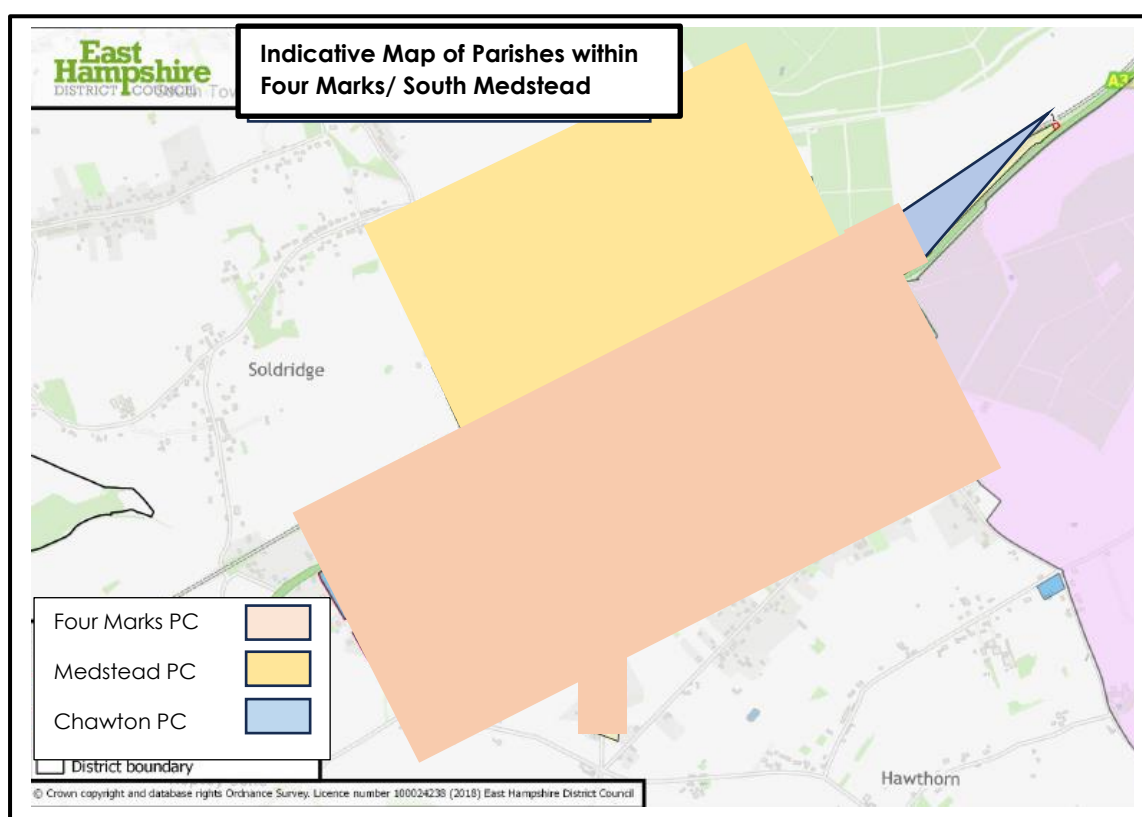
### 13.3 Interim Settlement Policy Boundary Review Background Paper, January 2024

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

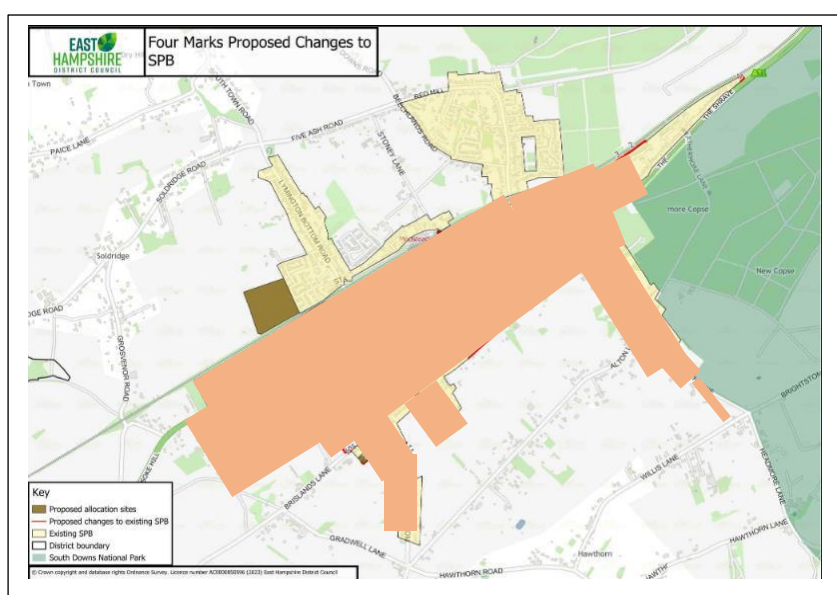
## Overview

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.**

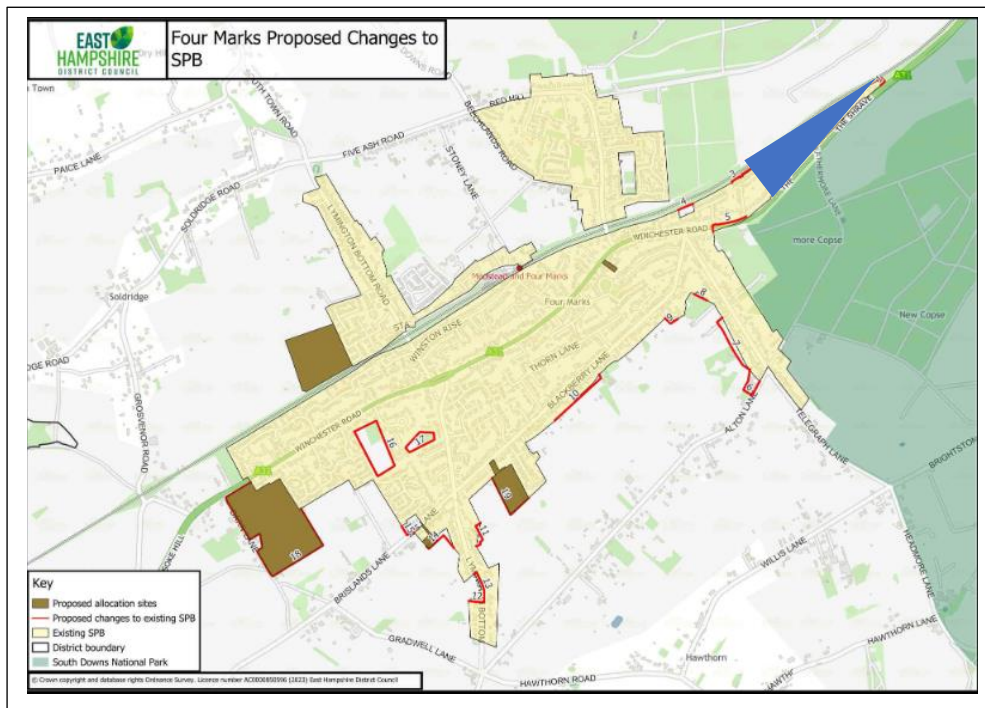
## Chawton



## 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.

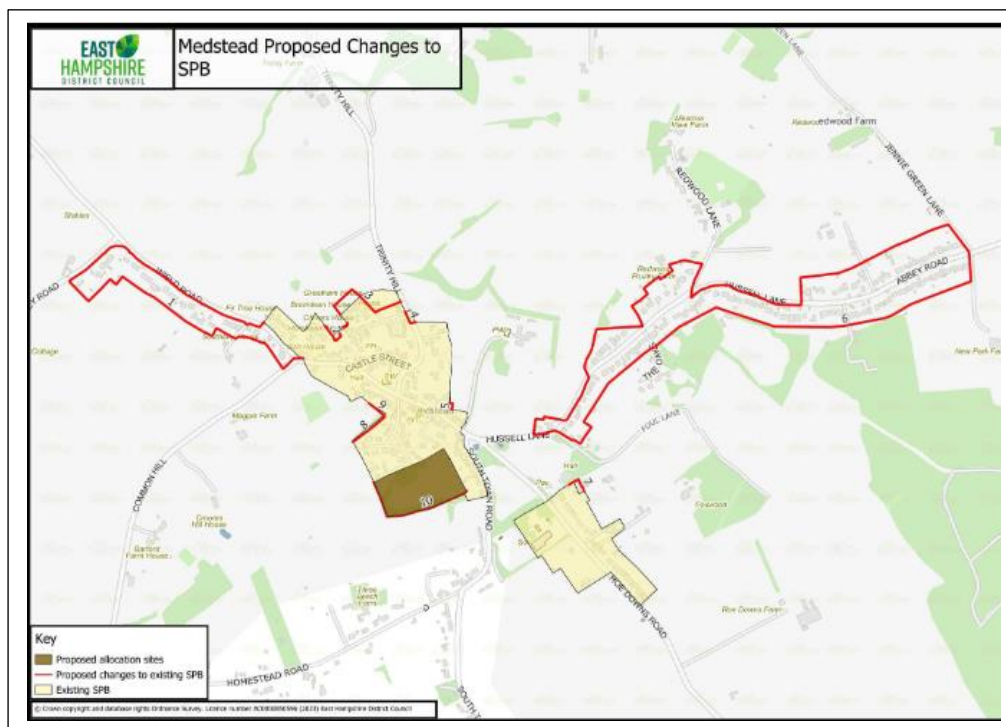
Four Marks Parish Council considers that the inclusion of this area within the Settlement Policy Boundary is unacceptable due to its status as a SINC, which also includes the perimeter hedgerows. It also notes that there are several TPO's in this area. Even if the border of the area was retained, there 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.

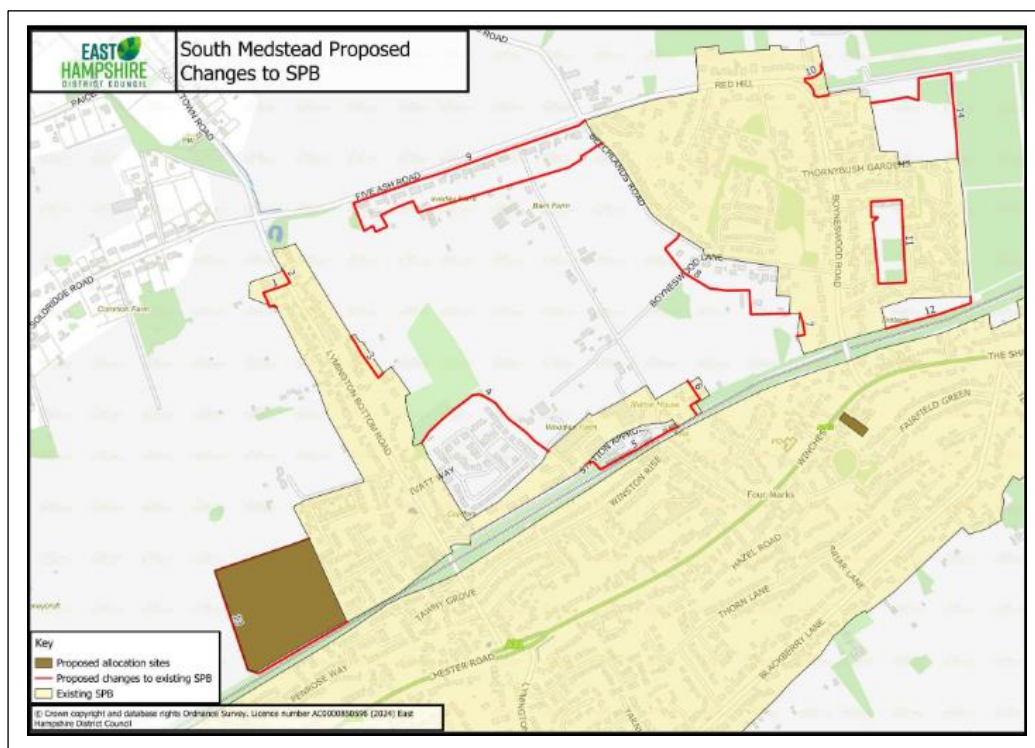
Medstead Parish Council had previously requested that the dwellings Shadingley House, Kelmscott, Braida Garth, Little Metcombe are removed, to place them outside this change to the SPB.

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 Traveller<sup>1</sup> 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 6<sup>th</sup> July 2021, received a supporting paper prepared by EHDC Officers *East Hampshire District Local Plan: Spatial Strategy Preferred Option*<sup>47</sup> 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 .

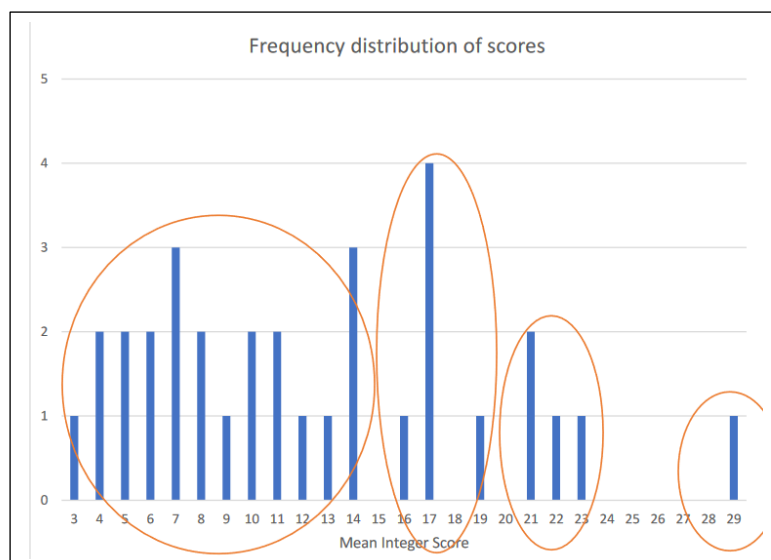
When reviewing the *Revised Settlement Hierarchy Background Paper, 2024*, the NPSG have grave concerns regarding the final logic on setting the Settlement Hierarchy using a subjective judgement that the local population is a common factor in supporting the 'viability' of a settlement. The NPSG considers 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:

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<sup>47</sup> EHDC Portal Planning Policy Committee 5<sup>th</sup> 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 31<sup>st</sup> 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.<sup>48</sup>

If the average occupancy is 2.4 persons a dwelling the estimated increase in population between 1<sup>st</sup> April 2013 to 31<sup>st</sup> 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.

<sup>48</sup> 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](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.*

- o 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.*

- o 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*<sup>49</sup> 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*<sup>50</sup>  
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/ Limington Bottom Road.

<sup>49</sup> Appendix 13.5 C below

<sup>50</sup> 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  $\geq 26$  points
2. Average accessibility score  $\geq 21$  points and  $\leq 25$  points
3. Average accessibility score  $\geq 16$  points and  $\leq 20$  points
4. Average accessibility score  $\geq 11$  points and  $\leq 15$  points
5. Average accessibility score  $\geq 0$  points and  $\leq 10$  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 Meadstead', and the regular need to access Alton, and more distant locations of Basingstoke and Winchester, for their retail needs.

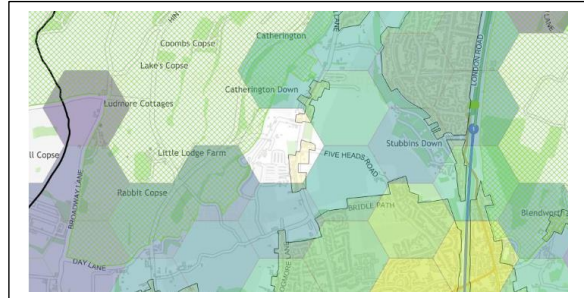
This was noted in the *Hampshire Retail and Main Town Centre Uses Study Final Report* by Lichfields , part of which is in 13.5. Appendix C.

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.

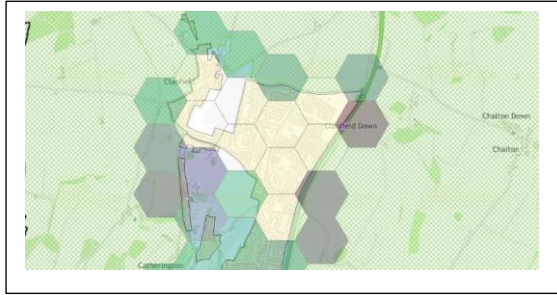
The NPSG notes the typographical errors regarding the hexagon scores for Four Marks/'South Meadstead', the minimum and maximum entries have been transposed.



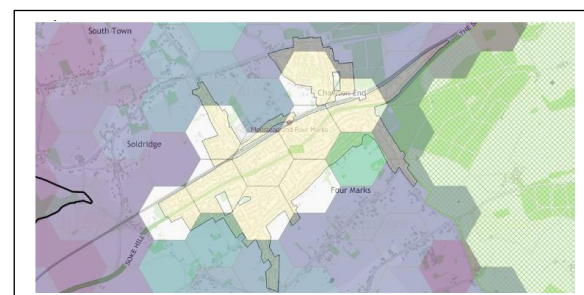
**Map 4: Bentley 16.71**



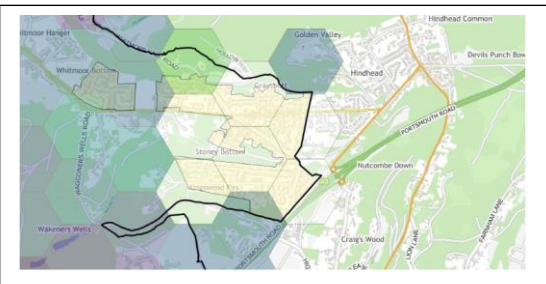
**Map 8: Catherington 10.71**



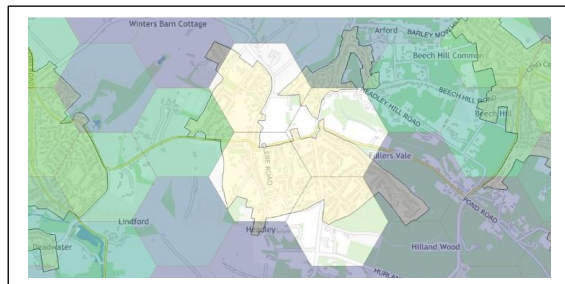
**Map 9: Clanfield 16.85**



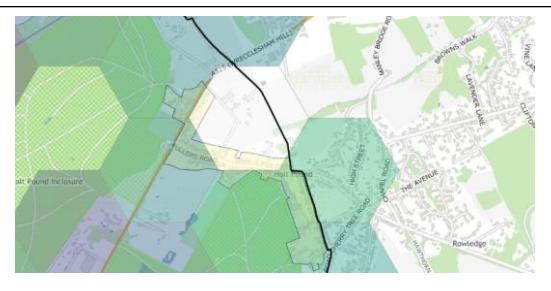
**Map 10: Four Marks 13.92**



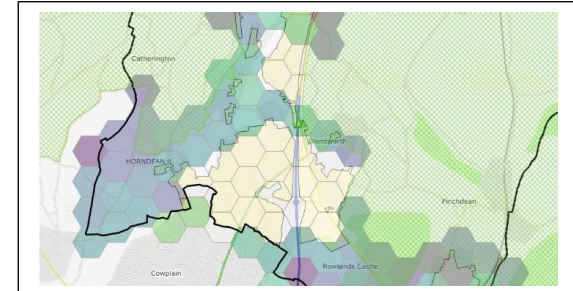
**Map 11: Grayshott 17.35**



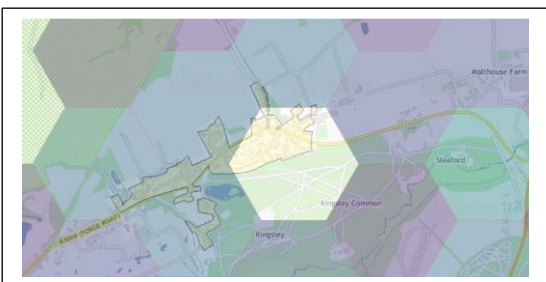
**Map 13: Headley 15.63**



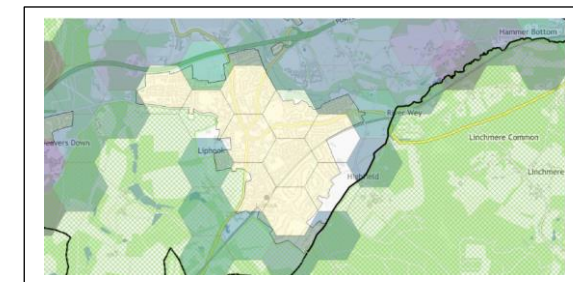
**Map 15: Holt Pound 16.60**



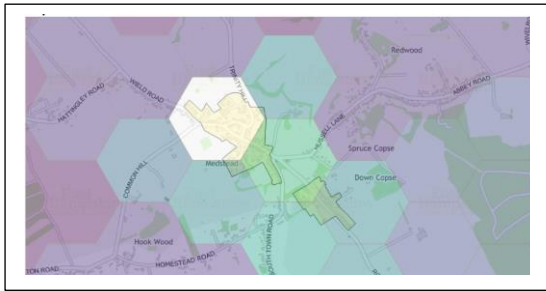
**Map 17: Horndean 18.50**



**Map 18: Kingsley 10.26**

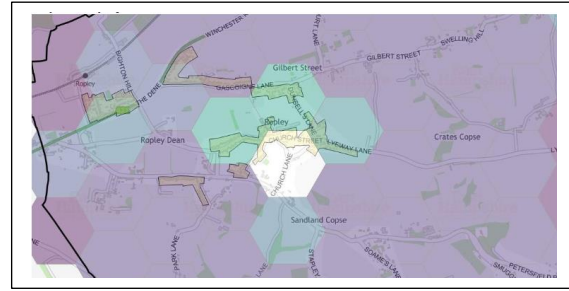


**Map 21: Liphook 22.67**



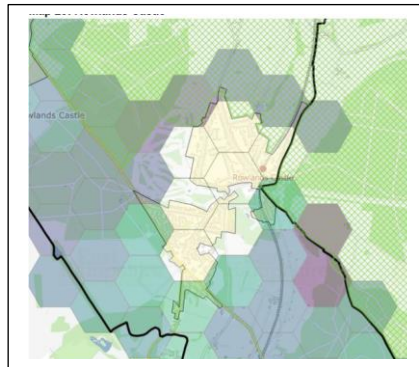
**Map 24: Medstead**

**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
<b>Total</b>	<b>59</b>	<b>25</b>	<b>18</b>	<b>17</b>	<b>9</b>

### 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 2023<sup>51</sup> which makes minimal changes

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<sup>51</sup> 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
<b>Total = None</b>	<b>Total = 4</b>

### 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
<b>Total = 3</b>	<b>Total = 5</b>

### 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
<b>Total = 15 (+1 Pharmacy)</b>	<b>Total = 86 (+3 Pharmacies)</b>

## 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
<b>Total = NONE</b>	<b>Total = 12</b>

### 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
<b>Total = 2</b>	<b>Total = 16</b>

### 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
<b>Total = 2</b>	<b>Total = 15</b>

### Banks/Building Societies

<b>Four Marks/'South Medstead'</b>	<b>Alton</b>
None	Santandar
	TSB
	Newbury
	Nationwide
<b>Total = NONE</b>	<b>Total = 4</b>

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
<b>Total</b>	<b>223.37</b>	<b>201.96</b>	<b>21.40</b>

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)
	<b>13</b> (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	<b>10</b>	<b>38%</b>
Café/restaurants	16	2	5	<b>3</b>	<b>60%</b>
Takeaways	15	2	4	<b>2</b>	<b>50%</b>
Pubs	12	0	3	<b>3</b>	<b>100%</b>
Banks/Building Societies	4	0	1	<b>1</b>	<b>100%</b>

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*<sup>52</sup>.

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*

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<sup>52</sup> 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](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)*<sup>53</sup>, as shown in *Figure 4: Distribution of Average Accessibility Study Scores (no. of settlements recording a certain score)*<sup>54</sup> 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)
<b>Group 1</b>	29	Alton (including Holybourne)
<b>Group 2</b>	21 to 23	Whitehill & Bordon (including Lindford), Liphook, and Horndean,
<b>Group 3</b>	16 to 19	Grayshott, Clanfield, Holt Pound Bentley, and Headley,
<b>Group 4</b>	3 to 14	<p><b>Score above 9.5:</b> Rowlands Castle, Four Marks (&amp; South Medstead), Ropley, Lovedean, Headley Down, Medstead, Catherington, Kingsley, and Arford</p> <p><b>Score below 9.5:</b> 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

<sup>53</sup> 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>

<sup>54</sup> 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 31<sup>st</sup> 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 data<sup>55</sup>, 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*<sup>56</sup>, 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 17<sup>57</sup>

<sup>55</sup> ONS Census Data 2011 and 2021 Distance of Travel to Work.  
<https://www.ons.gov.uk/census>

<sup>56</sup> 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>

<sup>57</sup> 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 18<sup>58</sup>
- RLC3 – Land at Oaklands House 001 - This site has a Ridge and Partners Transport Report 1 accessibility score of 17<sup>59</sup>
- RLC4 – Land at Little Leigh Farm 004 - This site has a Ridge and Partners Transport Report 1 accessibility score of 21<sup>60</sup>

#### 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 8<sup>61</sup>.
  - FMS3 Boundaries Surgery - This site is a medical site has a Ridge and Partners Transport Report 1 accessibility score of 21<sup>62</sup>.
  - FMS4 Land South of Winchester Road - This site has a Ridge and Partners Transport Report 1 accessibility score of 11<sup>63</sup>.
  - FMS5 Land at Fordlands, Brislands Lane - This site has a Ridge and Partners Transport Report 1 accessibility score of 10<sup>64</sup>.

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<sup>58</sup> 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>

<sup>59</sup> 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>

<sup>60</sup> 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

<sup>61</sup> 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>

<sup>62</sup> 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>

<sup>63</sup> 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>

<sup>64</sup> 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 8<sup>65</sup>.

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 15<sup>66</sup>
- HDN2 – Land south of Five Heads Road 004 - This site has a Ridge and Partners Transport Report 1 accessibility score of 17<sup>67</sup>
- HDN3 – Land north of Chalk Hill Road 008 - This site has a Ridge and Partners Transport Report 1 accessibility score of 24<sup>68</sup>

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 <sup>69</sup>, regarding traffic congestion on the A31 in the village.

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<sup>65</sup> 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>

<sup>66</sup> 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>

<sup>67</sup> 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>

<sup>68</sup> 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>

<sup>69</sup> 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* <sup>70</sup> 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.

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<sup>70</sup> 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 CO<sub>2</sub> 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:

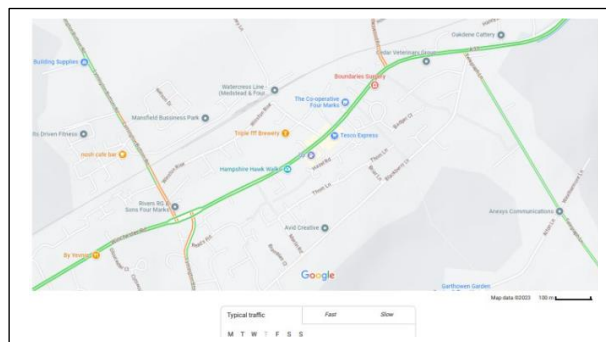


Figure 4.48: Four Marks highway congestion, average Thursday 08:30

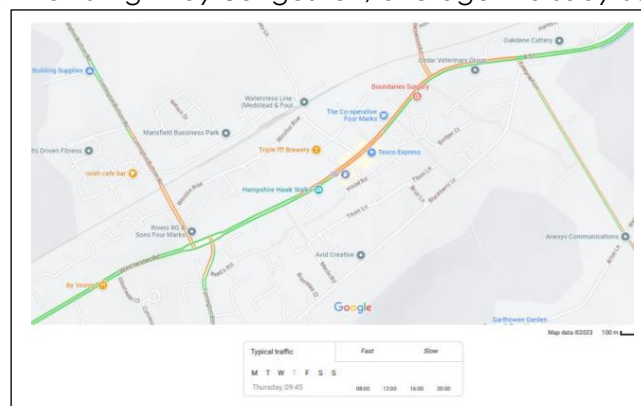


Figure 4.49: Four Marks highway congestion, average Thursday 09:45

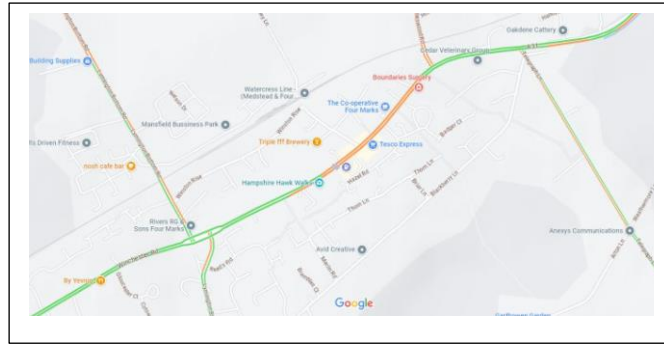


Figure 4.50: Four Marks highway congestion, average Thursday 12:00



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.

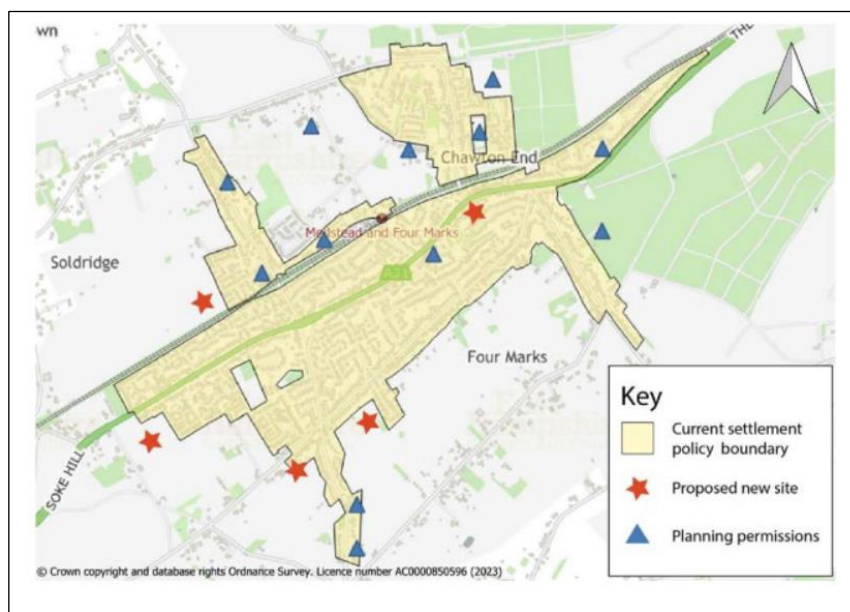


Figure 4.52: Location of proposed housing sites and outstanding permissions in Four Marks

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.

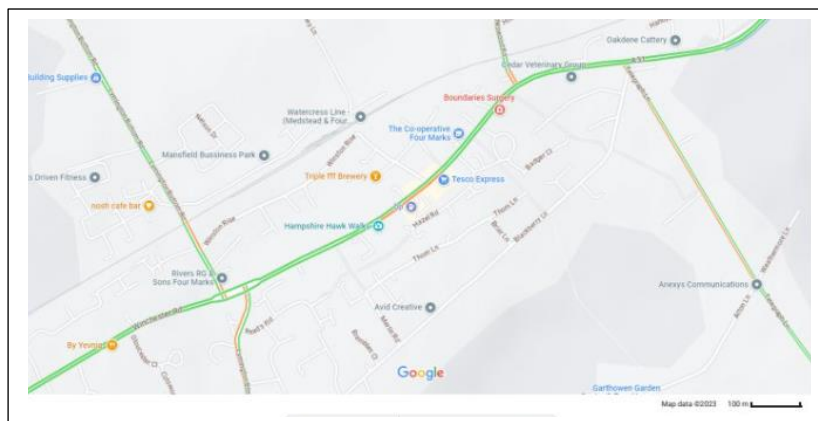
7.3 As evidenced in the district's current LCWIP (2020) there can be a lack of pedestrian footpaths and designated cycleways, particularly in the more rural parts of the district. This has been acknowledged in a number of locations, in conjunction with Hampshire County Council, and suitable schemes are 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)

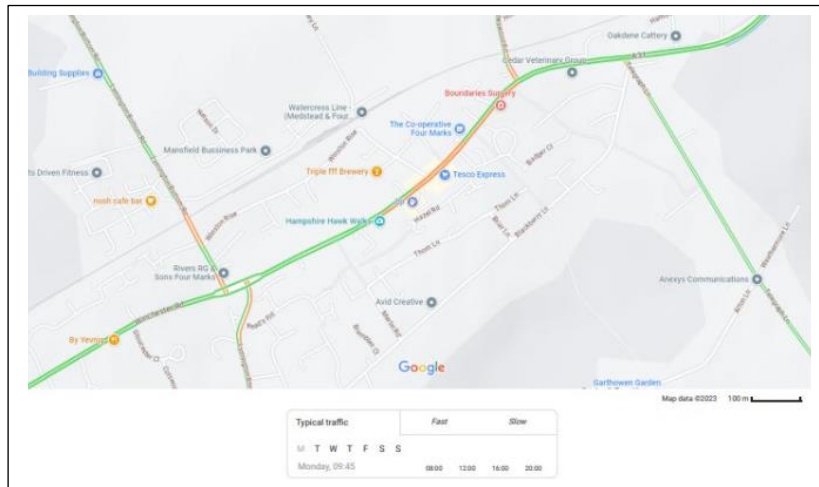


Average Monday 08:30

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),

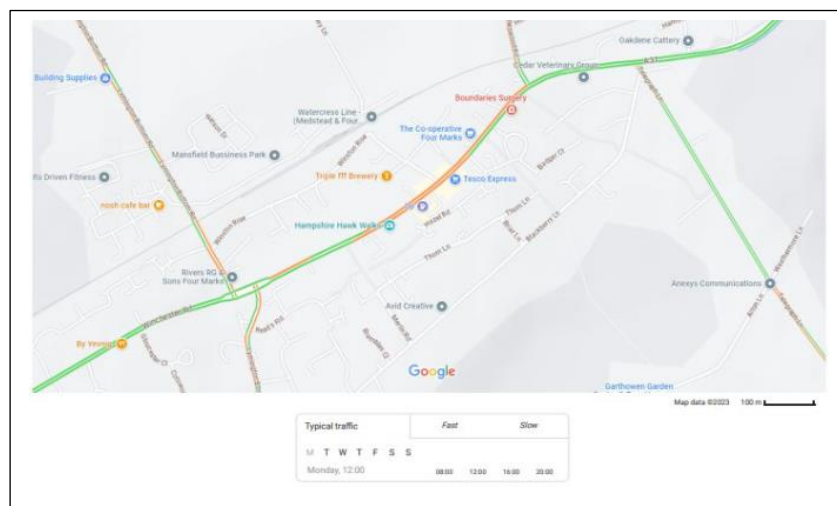
- Lymington Bottom Road railway bridge Northbound (75 m Bridge from Winston Rise) and Southbound (175 m Bridge from Ivatt Way)



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)

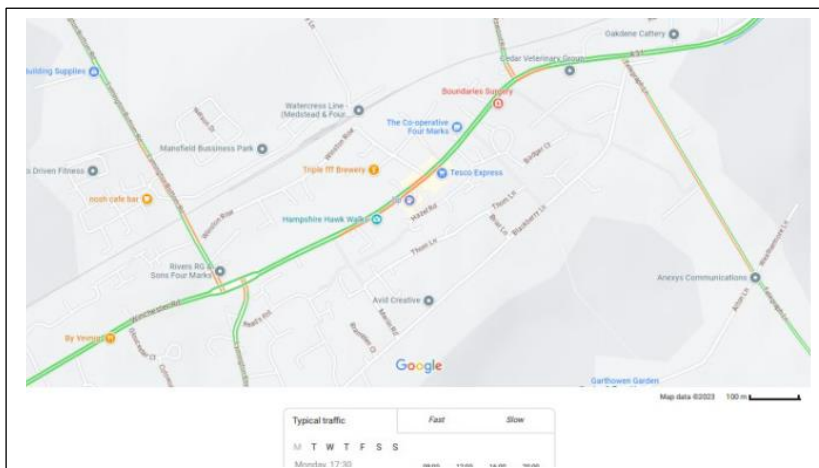


Average Monday 12:00

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)

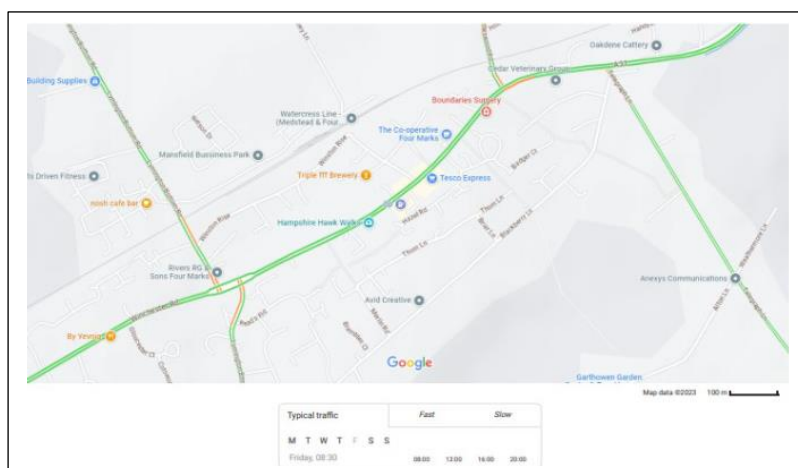


Average Monday 17:30

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)

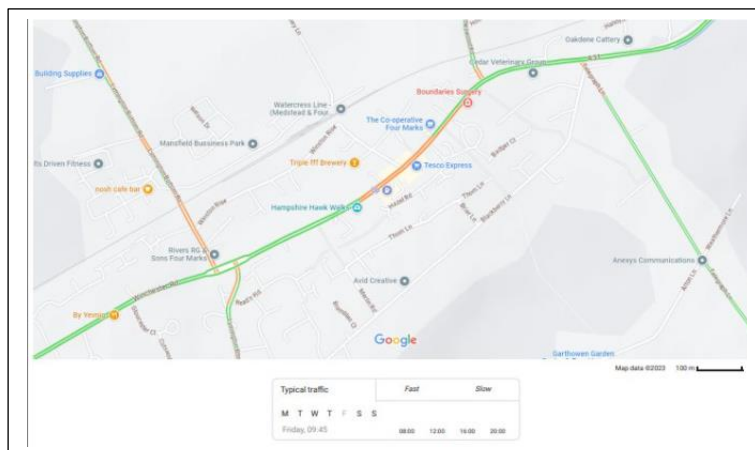
### Average Friday Congestion (in red)



Average Friday 08:30

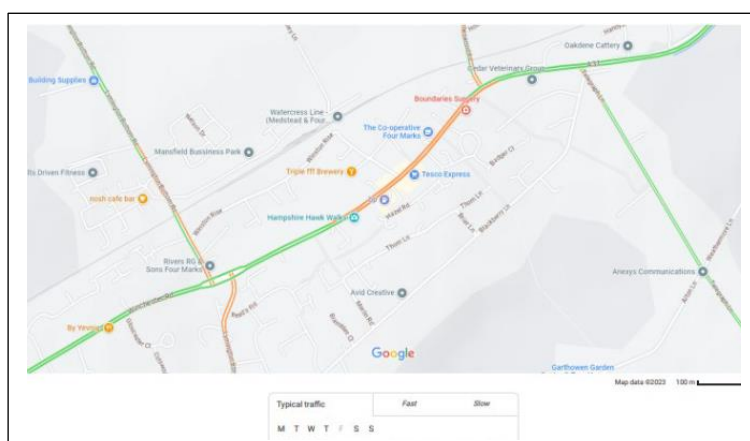
Congestion is shown at the following locations:

- 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).

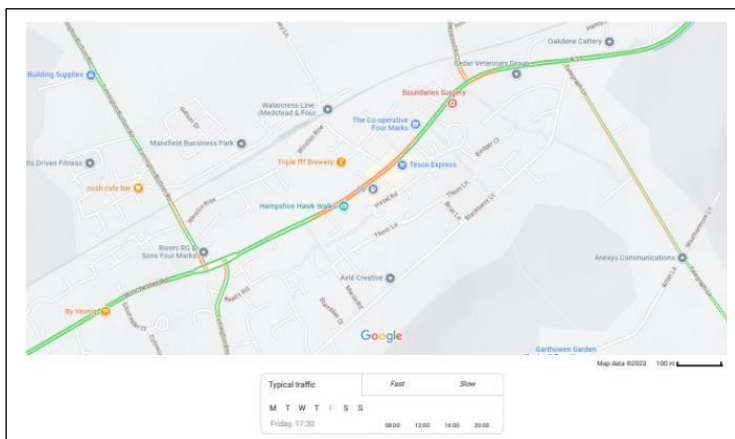


Average Friday 12:00

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)

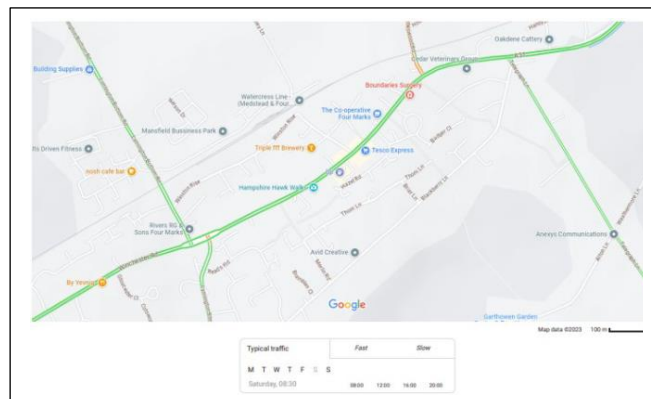


Average Friday 17:30

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)

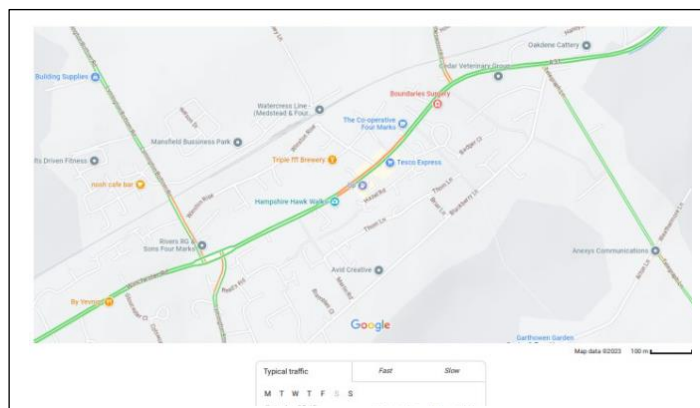


Average Saturday 08:30



Congestion is shown at the following locations:

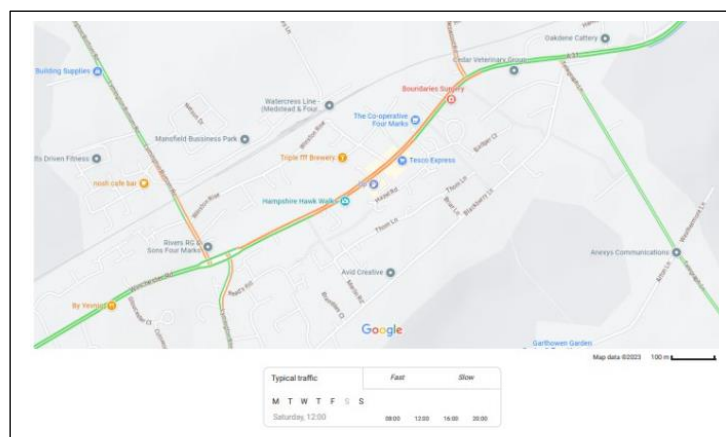
- Boyneswood Road - Northbound (120 m from A31 Junction), and Southbound (120 m A31 from Holland Drive).



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)

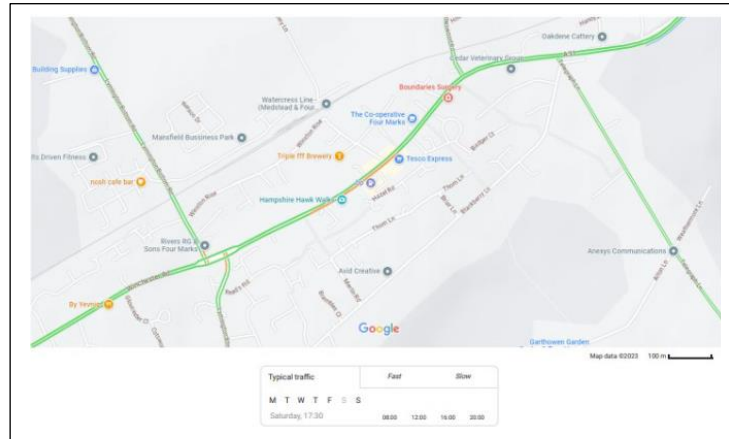


Average Saturday 12:00

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 website<sup>71</sup> it is noted that

‘East Hampshire District Council (EHDC) commissioned Witteveen+Bos UK Limited to develop an LCWIP<sup>72</sup> 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

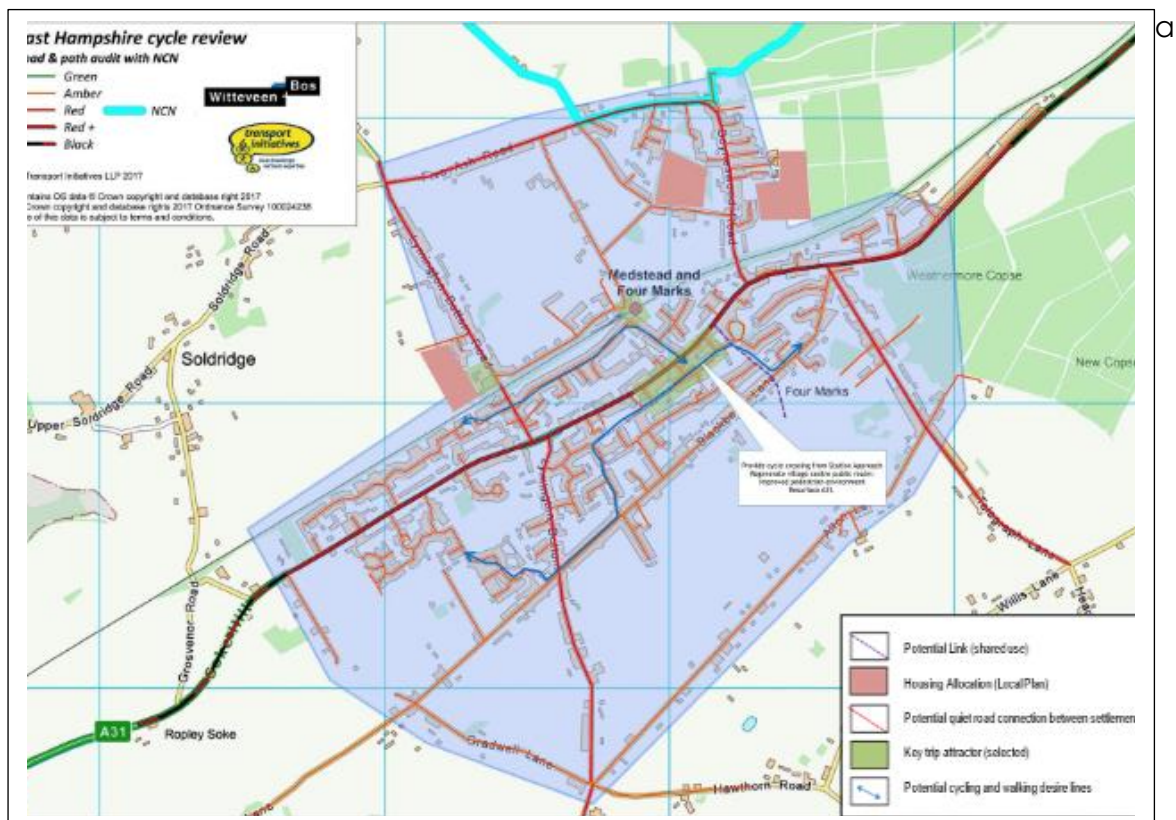
Within 4.3

‘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.*



<sup>71</sup> HCC Strategic transport - plans and policies Local Cycling and Walking Infrastructure Plan <https://www.hants.gov.uk/transport/strategies/transportstrategies>

<sup>72</sup> 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 <sup>2</sup>
Mar6	Stoney Lane and Boyneswood Lane (bridleway): upgrade loose gravel surface to rolled scalpings (proposed in 2004 Cycle Plan).	£ 15 m <sup>2</sup>
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.

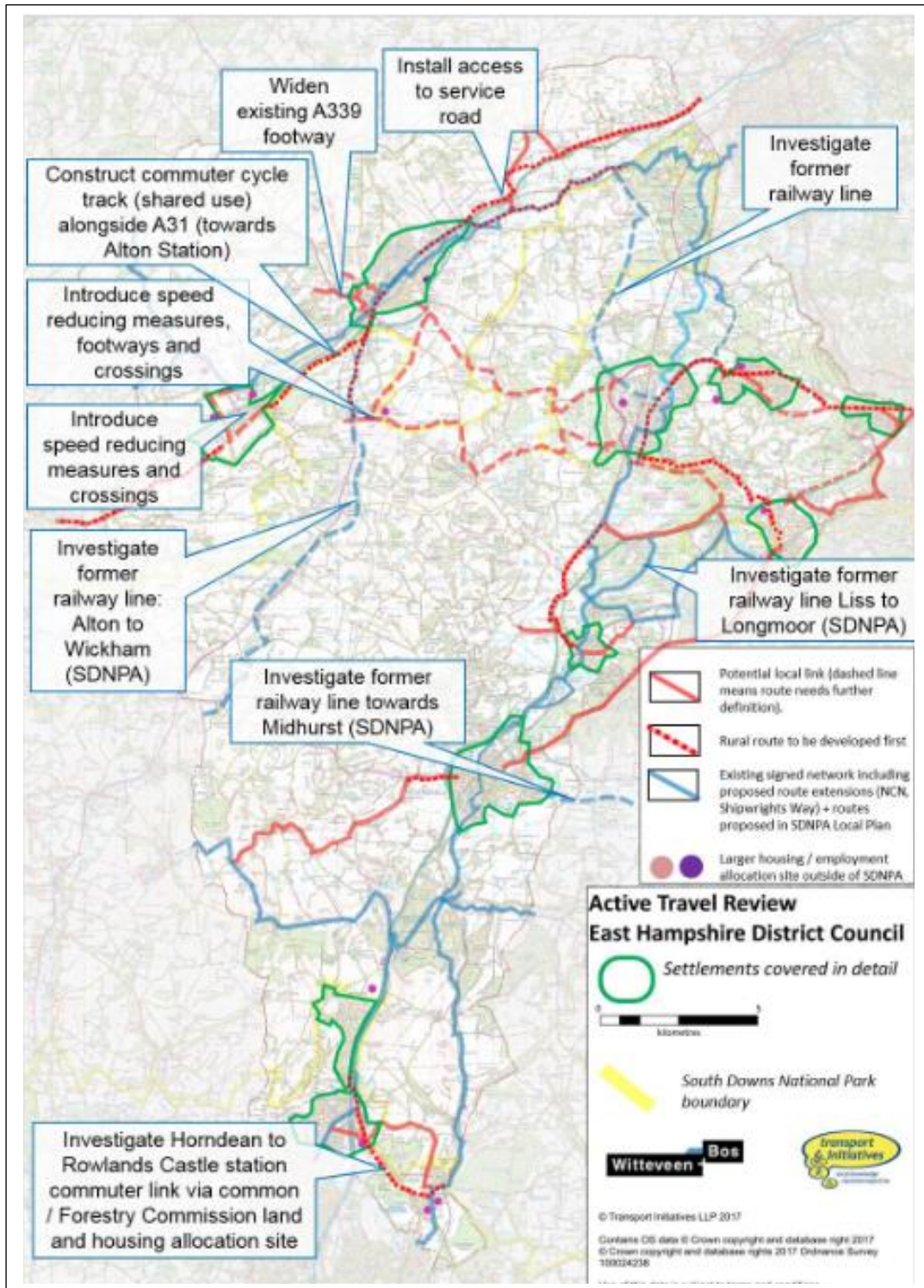


Table 5.44 Stakeholder comments

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 website<sup>73</sup> that

*'East Hampshire District Council (EHDC) commissioned Witteveen+Bos UK Limited to develop an LCWIP<sup>74</sup> 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,

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<sup>73</sup> **HCC Strategic transport - plans and policies Local Cycling and Walking Infrastructure Plan**  
<https://www.hants.gov.uk/transport/strategies/transportstrategies>

<sup>74</sup> **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.,

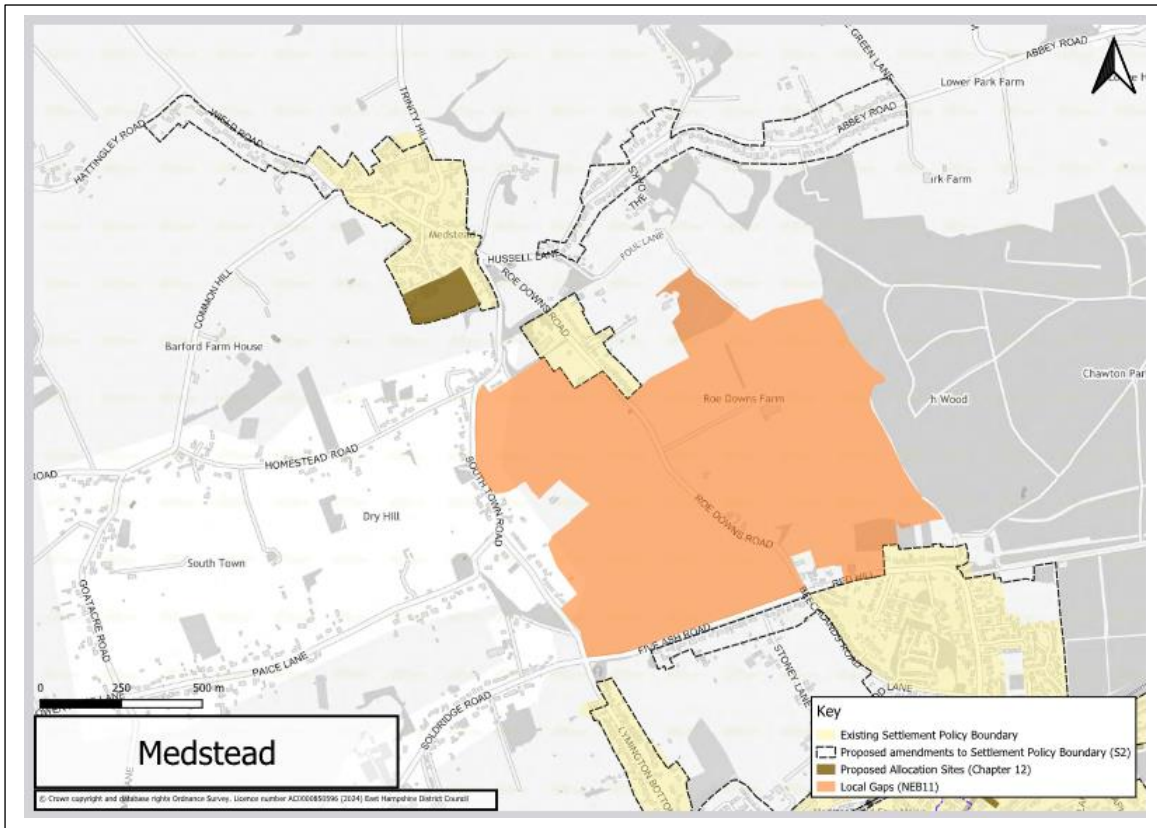
Simmerly, there is a public comment on creating a commuter link on the Mid Hants Heritage railway. From the M&FMNP 'due diligence' in 2015, it is known that HCC would have to subsidise this link by £100 k (2015 cost).

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.

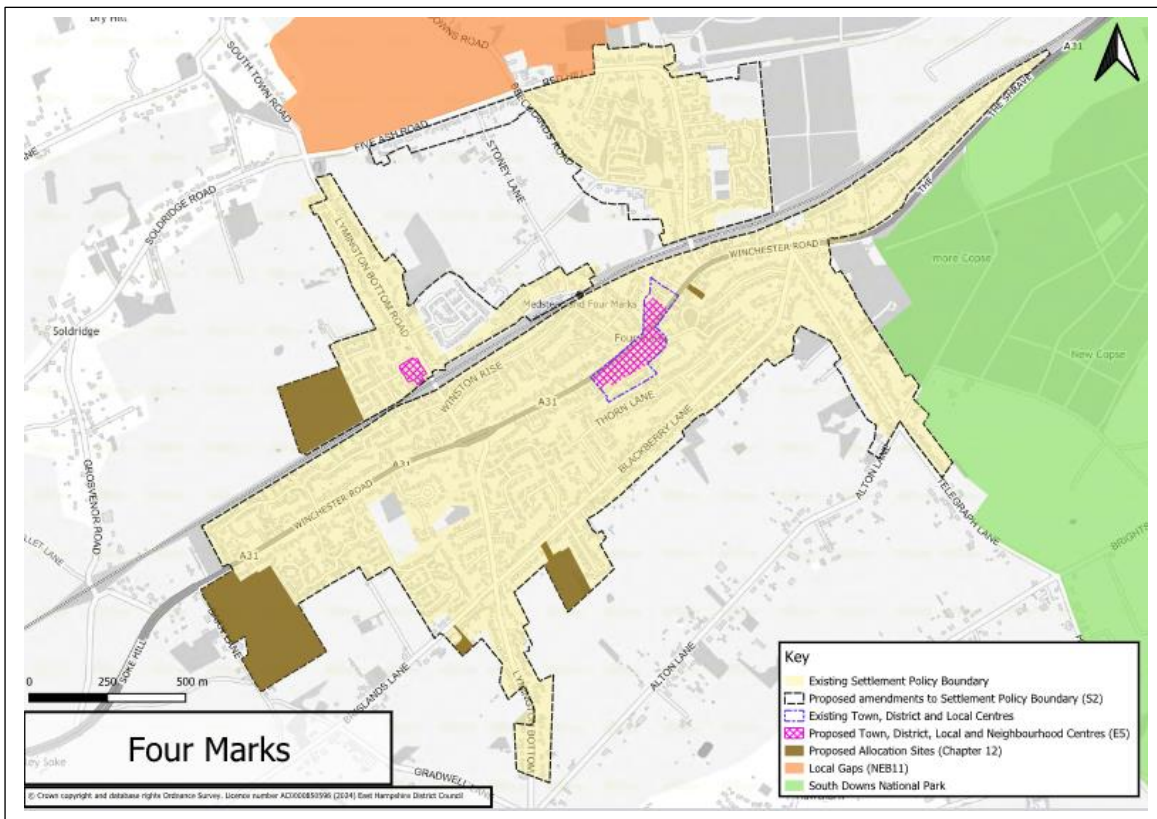
The NPSG note that the new DLP Policies include for cycle storage in new developments.

### 13.8 Policy Maps

#### Medstead Policy Map



#### Four Marks Policy Map





## East Hampshire Local Plan - Policy NBE11 Gaps Between Settlements - Medstead Beech & Wivelrod

Wed 28/02/2024 20:05

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

📎 1 attachments (2 MB)

Impact On Amenities Appeal Hearing Statement.pdf;

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

To:

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

### **East Hampshire Local Plan - Policy NBE11 Gaps Between Settlements**

The Medstead Beech & Wivelrod Rural Group was established in 2019 initially in response to a residential planning application between these settlements (referenced below). We now have over 200 members whose continuing aim is to *"preserve and enhance the rural nature of the neighbourhood and its landscape, maintaining the open spaces between and around these settlements"*.

We submit that there is a strong case for designating the rural area between Medstead Beech and Wivelrod as a recognised Gap-Between-Settlements under Policy NBE11. This critically important undeveloped landscape is about 800m at the narrowest point between Medstead and Beech, and extends southwards to Chawton Park Woods SINC and northwards to the extensive countryside with its mix of hedged fields, woodland and lanes around Bentworth.

#### **Appeal Reference: APP/M1710/W20/3249161:**

The planning submission above was within the gap and was refused, both by East Hants and at the subsequent appeal hearing.

The EHDC Landscape Character Assessment included Landscape Strategy and Guidelines

#### Section 2B.24 (Development Considerations)

"Maintain individual settlement identity and limit linear expansion and infilling between existing settlements e.g. Beech and Medstead, and Medstead to Four Marks."

The inspector's report highlighted:

- 1) The appeal site lies in the gap between the villages of Medstead and Beech.
- 2) There is no dispute that it is a countryside location.
- 3) Many of the characteristics of the LCA and LCT are evident both on the appeal site and its surroundings.

- 4) Settlements to the east and west (Beech and Medstead) are supplemented by smaller areas of development such as the hamlet of Wivelrod, as well as isolated farmsteads and Alton Abbey.
- 5) Despite the fact that Abbey Road runs west to east ... the locality has a deeply rural ambience which is experienced within the site and along the byway to the west (Jennie Green Lane) and in public rights of way such as that a short distance to the north.
- 6) The proximity of Beech and Medstead built development does not impinge to any degree on the tranquil nature of the area
- 7) Turning to visual effects there is agreement that those most sensitive to change brought about by development are recreational users of local footpaths and lanes.
- 8) The intrusion of the proposed development would be a significant detraction from the experience of walking, cycling or horse riding along the Jennie Green Lane.

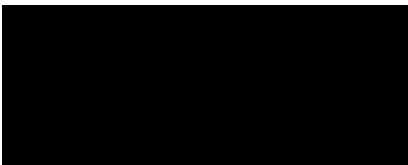
The Inspector's summing up included :

"... it is my judgement that the proposed development would lead to a major and adverse impact on the character of the landscape, and a moderate to major visual detraction, with unavoidable major adverse effects from some locations."

During the appeal hearing, our group provided evidence of the significant amenity value of this green space, for sustainable leisure, which was recognised by the inspector in his judgement (summary attached). The Brideway 701 continuing to Jennie Green Lane are the only North/South rural route connecting Chawton Park Woods to The Herriard Clay Plateau with its bridleways and long-distance paths around Bentworth and beyond. Abbey Road is the main East/West on-road cycle road connecting NCN 224 in Alton with NCN23 in Medstead - in fact being more heavily used than the offroad section of NCN224 through Chawton Woods.

Although the East Hants Planning refusal and the appeal judgement recorded some important and enduring principles regarding the critical nature of this gap, we believe a formal recognition is needed, given the relentless pressures to identify and develop green-field sites in the area.

Regards



## Summary and Update - Impact on Amenities

(Medstead Beech & Wivelrod Rural Group – June 2022)

Appeal Reference: APP/M1710/W20/3249161

Lower Park Farm, Abbey Road, Medstead, Hampshire

- In our paper: *July 2020*, which was summarised and updated in June 2022, we highlighted the recreational and leisure value and provided comprehensive evidence of this location's importance as a **rural leisure crossroads within the narrow gap of countryside between Medstead and Beech**
- The *'Statement of Common Ground: Section 5. which claims "The development would not have an undue impact on the amenities"* appears to be derived from a very narrow definition of 'amenity' – primarily concerned with the impact on occupants of land and buildings. ... perhaps understandable from a desktop study, as the nearest residence is over 150m away.
- However, the **Planning Portal's, own definition of amenity** is :
  - *"... a positive element or elements that contribute to the overall character or enjoyment of an area. For example, open land, trees, historic buildings and the inter-relationship between them, or less tangible factors such as tranquillity."*
- There is a much **wider range of stakeholders who may 'enjoy' a piece of landscape**. Drawn from our decades of living in the vicinity, we can provide a more inclusive, local perspective of the amenity impacts.

A brief summary of our amenity arguments is as follows:

1. Our primary objection is that **any form of residential development, will spoil this critical piece of countryside**, for residents and leisure users
2. The **proposed site is prominently in the middle of the remaining rural gap between the ribbon development that has reached out over a mile from Medstead and Beech centres**
3. A **wide range of leisure users make use of Abbey Road, Wivelrod Road, Jennie Green Lane and Bridleway 701, for leisure pursuits** in the Alton area, such as walking, jogging, horse-riding and cycling (both on- and off-road).
4. Our *July 2020* paper (Appendix 1): provided **comprehensive photographic evidence of the variety and volume of leisure activity** sampled on three separate days, showing the popularity of the routes surrounding the site
5. (Referring to Map 1). **The North South Route** connects Bridleway701 with Jennie Green Lane and is the **only right-of way North from the large Chawton Park Woods SINC**, and passes through **the narrow gap of open countryside to bridleways and long-distance paths around Bentworth** and beyond.

- (See Images 1-3 below). **In 2021 the council spent c£10,000 to improve this bridleway south of Abbey Rd**, due to its importance as it had become a muddy gully in winter
6. (Referring to Map 2) **The East West Route**. For a **cyclist travelling along Abbey Road between Beech and Medstead**, this short stretch of countryside is the **only piece of green landscape that signifies that I have left Beech, before I enter Medstead**.
  7. **Abbey Rd and Wivelrod Rd are the principle on-road link between the two National Cycle Network routes that pass through Alton and Medstead**, used extensively by recreational cyclists and clubs from the wider area.
    - (Referring to Map 4) **The Strava ‘heatmap’ data collected from actual cycle journeys, compellingly shows Abbey Road is the most popular East-West cycling route in the area**. It carries more cycle traffic than the off-road National Cycle Route 224, running through Chawton Woods. This route being unsuitable for road bikes and muddy in winter.
    - Thicker lines show more activity from registered users, red is more activity than blue
    - Sample maps from 2020 and 2022 are consistent in this matter
  8. (Referring to Map 3). **There are three horse riding businesses within 500m of the site** which evidences the importance of this locality for equestrian leisure.
  9. (Referring to Images 4 and 5). **The proposed development would be highly visible at all times of year, to leisure users, through the existing gateways and hedgerow gaps**. Even where the site is screened with native deciduous species, it will still be visible **through the hedgerows for six months a year when the leaves have dropped**.
  10. **General human activity and vehicle movements in and around the site will create a constant visual impact and noise disturbance** in this location which is currently a quiet rural meadow.
  11. **The site would dominate the first part of Wivelrod Road, the wide double access gate giving clear views** of large areas of hardstanding, day rooms, mobile homes and vehicles coming from and going to the site.
  12. Of the **227 objections to this proposal, the vast majority mention the rural character and/or the rural gap** between the two villages, that would be greatly affected.
  13. The substantial impact of this proposal on enjoyment of the landscape by walkers runners and riders **can only be fully appreciated through a site visit that includes walking around the lanes immediately surrounding the site** to experience the existing rural views.

Summing up:

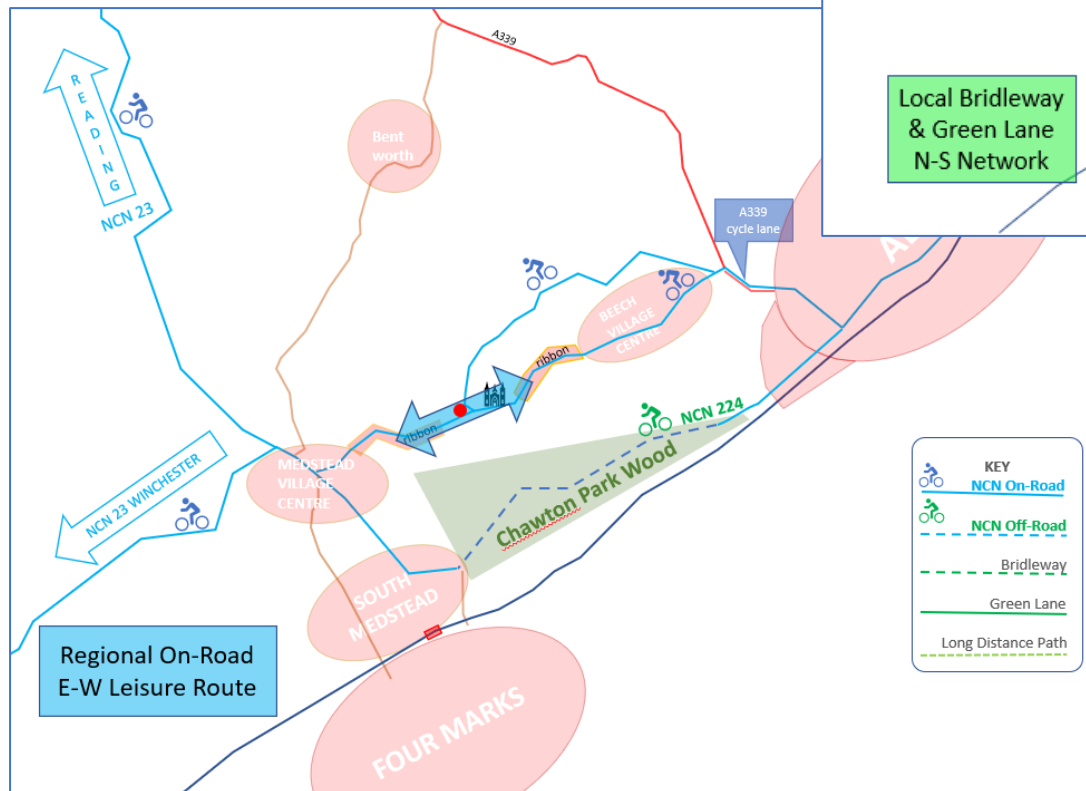
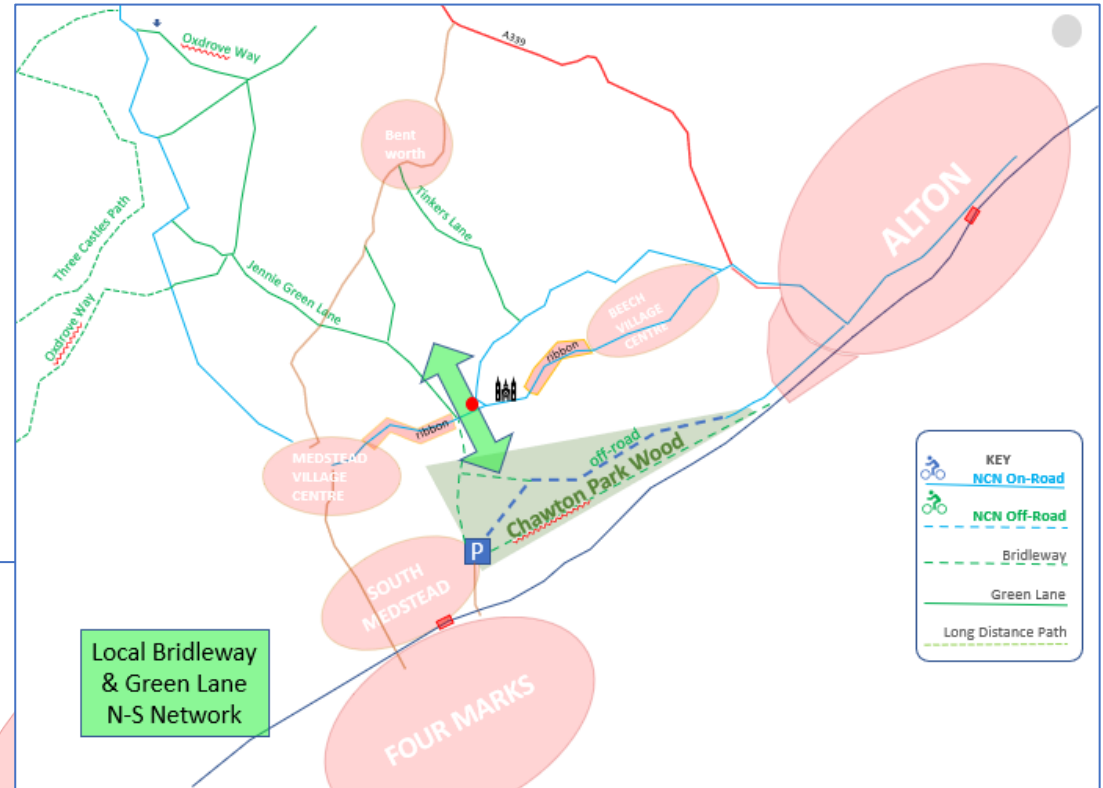
Our Amenity Impact papers provide comprehensive evidence that **this piece of landscape is enjoyed by a much wider range of ‘stakeholders’, than the occupants of land and buildings in the immediate vicinity of the site.** In considering this Appeal, we would request that Amenity position as documented in *‘Statement of Common Ground’ is not accepted, and as we have shown, is far too restricted*

- *The construction of 8 dwellings with extensive paved areas, would amount to building a suburban cul-de-sac, on what is currently tranquil and open countryside enjoyed by a wide range of recreational users and residents.*
- *Please do not mistake this location as an obscure back lane in a remote corner of Bentworth Parish.*
- *It is in reality a vital piece of rural landscape, in the part of East Hampshire District which is coming under intense pressure for development.*
- *It is a pinchpoint in the North-South greenway between two areas of high landscape quality and a key East-West on-road link between the two National Cycle Network routes in this area, serving sustainable leisure and the well-being of its users.”*
- *“No amount of site landscaping could change the fact that the remaining piece of pristine countryside between Medstead and Beech, would be compromised irreversibly with visible urban elements and associated activity.”*
- *“Our landscape in this part of Hampshire is being altered dramatically to meet the accommodation needs of people. Please consider that it is the people themselves who need landscape and character of settlements to be valued and preserved for sustainable leisure and their physical and mental well-being.”*

**Map 1: Local Bridleway & Green Lane 'North-South' Routes**

[Ref Paper: 6c. Map 3]

(proposed site shown as red dot)



**Map 2: Regional On-Road 'East-West' Leisure Routes**

[Ref Paper : 6d. Map 4]

(proposed site shown as red dot)

**Map 3: Rural Leisure Businesses**

[Ref Paper: Section 9]

(proposed site shown as red dot)

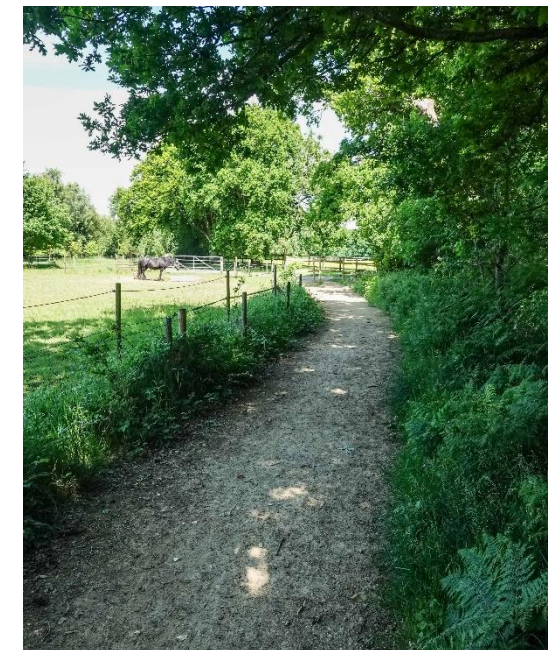


**Image 1: Banner Improvements to Bridleway 701**

[New Image 2022]

**Image 2/3: Bridleway 701 before/after improvements (2020/2022)**

[Ref Paper : A1.2 and New Image 2022]





**Images 4/5 – views into site Winter 2019**

**Image 4 : North from Abbey Rd**  
*[Ref Paper : 8.4.4]*

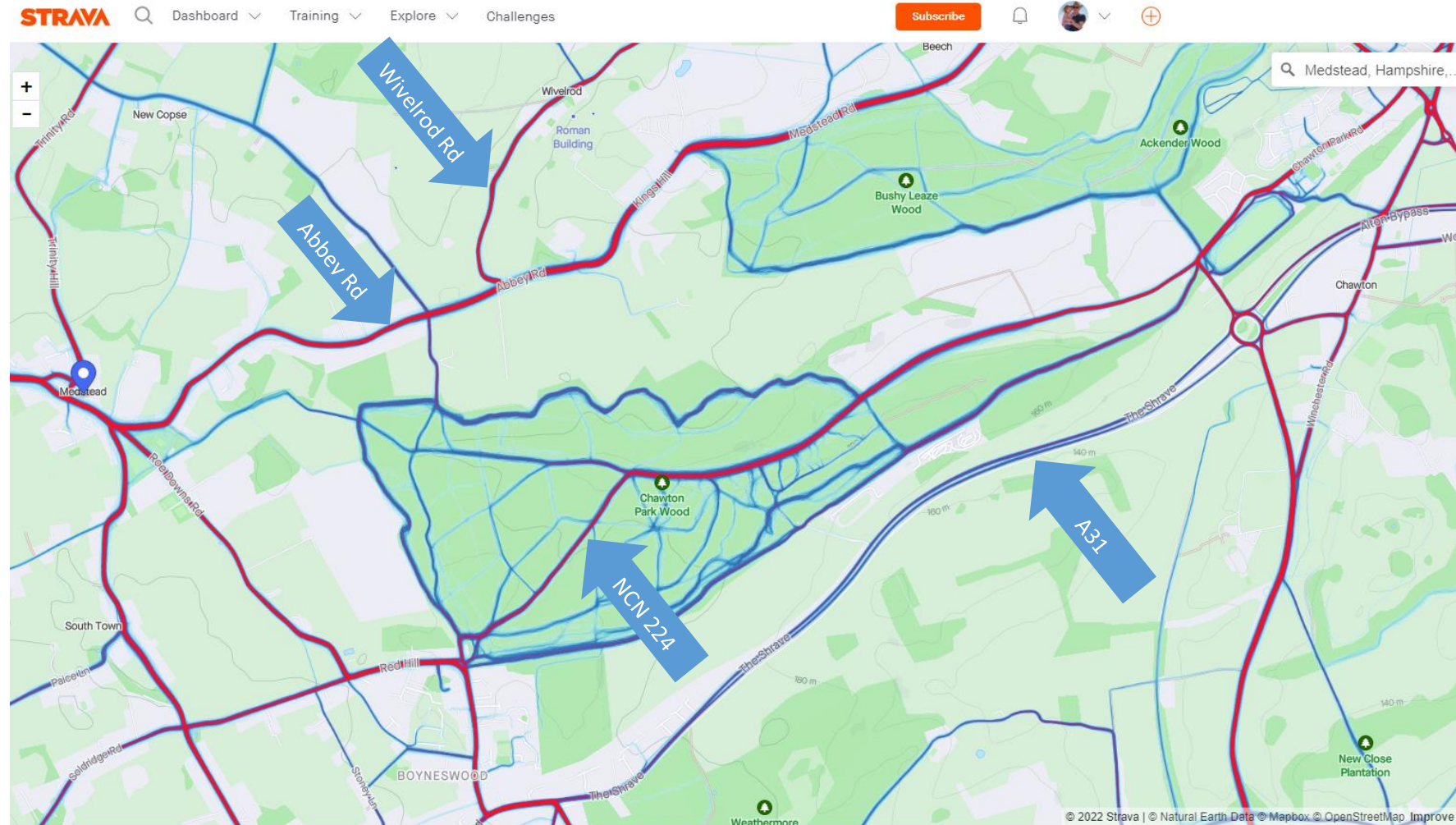
**Image 5: West from Wivelrod Rd Junction**  
*[Ref Paper : 8.4.1]*





#### Map 4: 'Strava' Cycling HeatMap 2022 [Updated from Map in Paper Section 10]

- The Strava Heatmap of relative volumes of cycling shows *Abbey Road as the preferred local E-W route*, as compared with the off-road Chawton Park Wood NCN224 route and avoiding the busy A31 trunk road. **Thicker lines show more activity from registered users, red is more activity than blue.**



- Strava claims to be “the biggest sports community in the world, with over 95 million athletes subscribed in 195 countries”.
- These images are visualizations of two years of trailing data from Strava’s network of app users who exercise with the app activated.
- The heatmaps are updated monthly and this map was downloaded on 3<sup>rd</sup> June 2022.
- <https://www.strava.com/heatmap#14.60/-1.03376/51.12838/bluered/ride> ; <https://www.bikeradar.com/news/strava-year-in-sport-2021/>

East Hampshire District Council  
Planning Policy  
Penns Place  
Petersfield  
GU31 4EX  
localplan@easthants.gov.uk

NHS Property Services Ltd



[www.property.nhs.uk](http://www.property.nhs.uk)

5<sup>th</sup> March 2024

BY EMAIL ONLY

**RE: Consultation on Draft Local Plan 2021-2040**

Thank you for the opportunity to comment on the above document. The following representations are submitted by NHS Property Services (NHSPS).

**NHS Property Services**

NHS Property Services (NHSPS) manages, maintains and improves NHS properties and facilities, working in partnership with NHS organisations to create safe, efficient, sustainable and modern healthcare environments. We partner with local NHS Integrated Care Boards (ICBs) and wider NHS organisations to help them plan and manage their estates to unlock greater value and ensure every patient can get the care they need in the right place and space for them. NHSPS is part of the NHS and is wholly owned by the Department of Health and Social Care (DHSC) – all surplus funds are reinvested directly into the NHS to tackle the biggest estates challenges including space utilisation, quality, and access with the core objective to enable excellent patient care.

**General Comments on Health Infrastructure to Support Housing Growth**

The delivery of new and improved healthcare infrastructure is significantly resource intensive. The NHS as a whole is facing significant constraints in terms of the funding needed to deliver healthcare services, and population growth from new housing development adds further pressure to the system. New development should make a proportionate contribution to funding the healthcare needs arising from new development. Health provision is an integral component of sustainable development – access to essential healthcare services promotes good health outcomes and supports the overall social and economic wellbeing of an area.

Residential developments often have very significant impacts in terms of the need for additional primary healthcare provision for future residents. Given health infrastructure's strategic importance to supporting housing growth and sustainable development, it should be considered at the forefront of priorities for infrastructure delivery. The ability to continually review the healthcare estate, optimise land use, and deliver health services from modern facilities is crucial. The health estate must be supported to develop, modernise, or be protected in line with integrated NHS strategies. Planning policies should enable the delivery of essential healthcare infrastructure and be prepared in consultation with the NHS to ensure they help deliver estate transformation.

## **Detailed Comments on Draft Local Plan Policies**

Our detailed comments set out below are focused on ensuring that the needs of the health service are embedded into the Local Plan in a way that supports sustainable growth. When developing any additional guidance to support implementation of Local Plan policies relevant to health, for example in relation to developer contributions or health impact assessments, we would request the Council engage the NHS in the process as early as possible.

### **Policy CLIM2 [Net Zero Carbon Development]**

Policy CLIM2 requires developments to consider and address impacts on carbon dioxide emissions for all sources in seeking to achieve net-zero emissions. The NHS requires all new development projects to be net zero carbon, and NHSPS fully support policies that promote carbon neutral development. In considering the implementation of policies related to net zero, we would highlight that NHS property could benefit from carbon offset funds collected where on-site carbon mitigation requirements cannot be met. This would support the NHS to reach the goal of becoming the world's first net zero healthcare provider.

### **Policy HWC1 [Health and Wellbeing of Communities]**

Policy HWC1 sets out the Council's commitment to making sure that new developments promote healthier lifestyles and improve overall health and wellbeing. NHSPS welcomes and supports the inclusion of policies that support healthy lifestyles, and the requirement for Health Impact Assessment on significant residential developments of 500 units or more. There is a well-established connection between planning and health, and the planning system has an important role in creating healthy communities. The planning system is critical not only to the provision of improved health services and infrastructure by enabling health providers to meet changing healthcare needs, but also to addressing the wider determinants of health.

### **Policy DGC1 [Infrastructure]**

Policy DGC1 states that all new development will be required to provide for the necessary on-site or off-site infrastructure requirements arising from the proposal, including health services (acute, primary and secondary healthcare).

Healthcare providers should have flexibility in determining the most appropriate means of meeting the relevant healthcare needs arising from a new development. Where new developments create a demand for health services that cannot be supported by incremental extension or internal modification of existing facilities, this means the provision of new purpose-built healthcare infrastructure will be required to provide sustainable health services. Options should enable financial contributions, new-on-site healthcare infrastructure, free land/ infrastructure /property, or a combination of these. It should be clarified that the NHS and its partners will need to work with the council in the formulation of appropriate mitigation measures.

### **Policy DGC4 [Protection of Community Facilities]**

Policy DGC4 focuses on the protection of existing community facilities. NHSPS supports the provision of sufficient, quality community facilities but does not consider the proposed policy approach to be positively prepared or effective in its current form. Where healthcare facilities are included within the Local's Plan definition of community facilities, policies aimed at preventing the loss or change of use of community facilities and assets can potentially have a harmful impact on the NHS's ability to ensure the delivery of essential facilities and services for the community.

The NHS requires flexibility with regards to the use of its estate to deliver its core objective of enabling excellent patient care and support key healthcare strategies such as the NHS Long Term Plan. In particular, the disposal of redundant or no longer healthcare suitable sites and properties for best value (open market value) is a critical component in helping to fund new or improved services within a local area. Requiring NHS disposal sites to explore the potential for alternative community uses and/or to retain a substantial proportion of community facility provision adds unjustified delay to vital reinvestment in facilities and services for the community.

All NHS land disposals must follow a rigorous process to ensure that levels of healthcare service provision in the locality of disposals are maintained or enhanced, and proceeds from land sales are re-invested in the provision of healthcare services locally and nationally. The decision about whether a property is surplus to NHS requirements is made by local health commissioners and NHS England. Sites can only be disposed of once the operational health requirement has ceased. This does not mean that the healthcare services are no longer needed in the area, rather it means that there are alternative provisions that are being invested in to modernise services.

Where it can be demonstrated that health facilities are surplus to requirements or will be changed as part of wider NHS estate reorganisation and service transformation programmes, it should be accepted that a facility is neither needed nor viable for its current use, and policies within the Local Plan should support the principle of alternative uses for NHS sites with no requirement for retention of a community facility use on the land. To ensure the Plan is positively prepared and effective, NHSPS are seeking the following modification (*shown in italics*) to Policy DGC4.

Proposed Modification to Policy DGC4:

*Where healthcare facilities are declared surplus or identified as part of an estates strategy or service transformation plan where investment is needed towards modern, fit for purpose infrastructure and facilities, there will be no requirement to retain any part of the site in an alternative community use.*

### Policy H3 [Affordable Housing]

Policy H3 sets out affordable housing requirements and supporting paragraph 9.61 set out the criteria that would need to be met to be eligible for affordable housing. As part of preparing additional guidance to inform detailed delivery of this policy, we suggest the Council consider the need for affordable housing for NHS staff and those employed by other health and care providers in the local authority area. The sustainability of the NHS is largely dependent on the recruitment and retention of its workforce. Most NHS staff need to be anchored at a specific workplace or within a specific geography to carry out their role. When staff cannot afford to rent or purchase suitable accommodation within reasonable proximity to their workplace, this has an impact on the ability of the NHS to recruit and retain staff.

Housing affordability and availability can play a significant role in determining people's choices about where they work, and even the career paths they choose to follow. As the population grows in areas of new housing development, additional health services are required, meaning the NHS must grow its workforce to adequately serve population growth. Ensuring that NHS staff have access to suitable housing at an affordable price within reasonable commuting distance of the communities they serve is an important factor in supporting the delivery of high-quality local healthcare services. We recommend that the Council:

- Engage with local NHS partners such as the local Integrated Care Board (ICB), NHS Trusts and other relevant Integrated Care System (ICS) partners.
- Ensure that the local need for affordable housing for NHS staff is factored into housing needs assessments, and any other relevant evidence base studies that inform the local plan (for example employment or other economic policies).
- Consider site selection and site allocation policies in relation to any identified need for affordable housing for NHS staff, particularly where sites are near large healthcare employers.

**Conclusion**

NHSPS thank East Hampshire District Council for the opportunity to comment on the Draft Local Plan. We trust our comments will be taken into consideration, and we look forward to reviewing future iterations of the Plan. Should you have any queries or require any further information, please do not hesitate to contact me.

Yours faithfully,

[Redacted signature block]

**For and on behalf of NHS Property Services Ltd**

## PeCAN response to Local Plan consultation

Tue 13/02/2024 14:35

📎 1 attachments (275 KB)

PeCAN response to EHDC draft Local Plan consultation - Reg 18 - February 2024.pdf;

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

Dear EHDC Local Plan team,

Please find attached a pdf with all of PeCAN's responses to the draft Local Plan consultation (Reg 18), as submitted via Commonplace on Friday.

While the comments focus mostly on filling in gaps (we thought the treatment of listed and heritage buildings, flood management, BNG enforcement, and active travel could be strengthened), I would like to put on record that, as a community group, we strongly support the overall draft and hope it will be a model for others. It rightly gives priority to climate and nature issues and we were pleased to see that many of PeCAN's earlier comments had been incorporated - thank you.

We thought standout aspects included that new homes should be built to a much higher energy efficiency standard and should produce the same amount of renewable energy as they use. We support the presumption against development in the countryside and recognition of our legally protected sites and landscapes; the important role for Natural England; of the value of our natural environment and the need to look after our natural resources, soil and water in particular.

I hope the plan can be adopted in due course, without being watered down and with any gaps filled.

We have today published a short [blog](#) and will use this and our social media channels to encourage other residents to respond to the consultation.

Thank you for your work,

  
 Petersfield Climate Action Network

[www.petersfieldcan.org](http://www.petersfieldcan.org)



## PeCAN comments on East Hants draft Local Plan 2021-2040, Regulation 18, February 2024

<https://www.easthants.gov.uk/planning-services/planning-policy/local-plan/draft-local-plan-2021-2040>

This document lists the consultation comments submitted on 9 February 2024 by the Petersfield Climate Action Network to EHDC's draft Local Plan consultation. The comments were compiled by PeCAN trustees [REDACTED]

Overall, we support the plan and think it contains many strong policies concerning climate and nature that we hope to see adopted. Where we have spotted gaps, we have proposed some suggestions as below.

We are grateful to the planning policy team at EHDC for preparing a robust consultation text and for providing the opportunity to comment.

### Section 2: Vision and Objectives

**Vision statement:** we suggest adding the nature emergency to the vision as follows "...respond positively to the climate emergency and the nature emergency."

**Objectives B1 to B6:** we support these objectives. To bring the draft Local Plan into line with best practice, we suggest adding a reference in these objectives to the Council's area-wide net zero and nature targets in its updated Climate and Environment Strategy. For examples of how this has been done in other adopted Local Plans, see [https://councilclimatescorecards.uk/question/s3\\_p\\_lu\\_q1/?type=district#performance](https://councilclimatescorecards.uk/question/s3_p_lu_q1/?type=district#performance)

### Section 4: Responding to the Climate Emergency

**CLIM1:** Tackling the Climate Emergency

We strongly support this policy and suggest the following small improvements:

1.3.d requires new transport infrastructure to support active travel and public transport; the impact on existing transport infrastructure should also be considered e.g. to avoid reducing the amenity or safety of existing paths.

**CLIM2:** Net Zero Carbon Development: Operational Emissions

We strongly support this policy. The inclusion of minimum standards for Energy Use Intensity will provide clarity for developers.



2.2 we suggest narrowing or removing the scope for developers to claim financial unviability as a reason for not meeting the standards in 2.1. As an example, see the wording under ‘Exceptional Basis Clauses’ in policy S7 of the adopted plan of Central Lincolnshire <https://www.n-kesteven.gov.uk/sites/default/files/2023-04/Local%20Plan%20for%20adoption%20Approved%20by%20Committee.pdf>

2.3 Where new non-residential buildings provide significant opportunity for heat recovery, this should be considered. For example, applications for new facilities such as data centres, waste processing, power generation, refrigeration plants etc that generate surplus heat could be required to consider how surplus heat can be re-used, for example in space heating, district heat networks, industrial processes, heating of swimming pools, etc.

2.5 There should be a presumption in favour of allowing sympathetic retrofitting measures at listed and heritage buildings, linked to amended texts at NBE14, DM4.

### **CLIM3:** Net Zero Carbon Development: Embodied Emissions

We strongly support this policy, especially as the government intends to consult on measuring and reducing embodied carbon in new buildings shortly (see 13 Dec 2023 Future Homes and Buildings Standards consultation). The implementation notes would be a good place to discuss the environmental impacts of choosing natural versus manufactured building materials, as a way of reducing embodied carbon.

### **CLIM4:** Renewable and Low Carbon Energy

We support this policy.

4.1 lists several reasons why a renewable or low carbon energy scheme might be deemed unacceptable. Since this is subjective, people could hold different opinions about what is acceptable, for example about how a solar farm impacts a view. We therefore suggest clarifying who makes this judgement and how, to avoid situations where one or two individuals are able to block schemes that the LPA and local residents would otherwise support.

4.3 District heating (4.50) and community energy (4.64) should be named in the main policy.

### **CLIM5.3:** Climate Resilience

We strongly support the requirement for homes to be resilient to a changing climate and the addition of requirements on green and blue infrastructure and space to grow food.

### General comments:

The main CLIM policies are excellent.

There is a big gap around retrofitting of listed and heritage buildings that could lead to missed opportunities to sympathetically retrofit listed buildings and buildings in conservation areas. Examples of measures include appropriate double glazing, solar and heat pumps. We suggest making this explicit in CLIM 2.5 as mentioned above, and also revising NBE14 and DM4 to make it easier for sympathetic retrofit measures to be allowed in heritage buildings. See guidance from Historic England <https://historicengland.org.uk/advice/technical-advice/retrofit-and-energy-efficiency-in-historic-buildings/>





We suggest that a reference should be made in this section to ensuring adequacy of electricity supply, for example in cases where triple phase electricity would be needed when heat pumps and fast EV chargers are to be used together.

## Section 5: Safeguarding our Natural and Built Environment

### **NBE3** Biodiversity Net Gain (BNG) and Implementation:

The legal requirement for BNG recently entered into UK legislation. The document clearly outlines that planning applications must demonstrate a BNG of at least 10% *above the baseline biodiversity* that would have been recorded prior to an Outline application.

#### 5.26 Implementing the Policy

PeCAN feels it needs to be made much clearer that BNG must reach *at least 10% over and above any compensation for lost habitat incurred by the development*, and that a plan to achieve this is now required by law and must include a costed Management Plan and Maintenance Plan to cover 30 years post development.

#### 5.27 Measures for BNG

“Opportunities to enhance new developments through the provision of nesting and roosting features within routine building practices...” PeCAN suggests these should be listed here and made conditional, the siting of which would follow ecologist advice: swift bricks, bat bricks, hedgehog highways, and hedges rather than fences.

5.28 PeCAN asks with whom does legal responsibility lie for ensuring BNG is actually met over time (i.e. carrying out regular species and habitat surveys), and who is responsible for delivering the Management Plan and Maintenance Plan for the forthcoming 30 years? It should be clarified here whether it is the developer, the residents, the local authority, Natural England?

On page 98 there is a confusing caption beneath an image of a floristic field margin which lists developments that are exempt from BNG. This includes “biodiversity gain sites”, which, we conclude, must be a mistake.

### **NBE7** Managing Flood Risk and Implementation:

5.46 Water Environment - PeCAN notes that Hampshire County Council (HCC) is the designated lead Local Flood Authority and is thereby responsible for flood risk management.

PeCAN is concerned that here is a *presumption for development* even in flood risk zones (NBE7.5) and an assumption that the installation of SuDS will provide sufficient flood management (NBE7.3). We assert there should instead be a *presumption against development in flood risk zones* and we ask what evidence has been used to make a strong case for the use only of SuDS as mitigation. SuDS provide rainfall amelioration (as soak-aways) if the ground water is below surface level, but not when the water table is full. PeCAN also suggests clarification is needed to show which body will be responsible for the maintenance of SuDS over time to ensure they are providing the function expected of them. If this will be HCC, then this should be stated.

NBE7.1 states, Development "must be safe for its lifetime...without increased flood risk elsewhere and where possible reduce flood risk over-all, demonstrated through a site-specific flood risk



assessment which must take into account climate change allowances". PeCAN suggests that the climate change projections for southeast England are referred to; these will preclude much of our area from development, including some of the sites proposed by the Draft Local Plan, many of which are close to rivers.

#### **NBE8.4** Water quality, supply & efficiency

5.60 East Hampshire District falls within an "area of serious water stress", meaning any further claims on water-consumption will put our system under yet further stress. PeCAN understands that local authorities have a legal duty to adhere to River Basin Management Plans and what they recommend with regards to water use/abstraction.

PeCAN welcomes the Plan's proposal that a minimum building standard of 95 litres/per person/per day is applied (national guideline is 110 litres/day) because of the serious water stress, but we note with alarm that development and expansion of waste-water facilities (from development), "will normally be permitted if need outweighs environmental constraints". PeCAN would like to see a description of the metric to be applied for this calculation.

#### **NBE9** - Water Quality & Implementation

This includes the impact on the Solent Internationally Important Sites (SPA's and SAC's) and speaks about nutrient neutrality, another new legal planning obligation (NPPF December 2023). The Plan states it is critical to incorporate nutrient neutrality measures for new builds and developers must calculate the nutrient budget for their project. PeCAN suggests this needs more detail, including which bodies will be responsible for ensuring the measures are met and continue to be met over time.

5.68 PeCAN notes, with some alarm - "Commercial development proposals will not need to address nutrient neutrality as it is considered that the population that work in businesses live locally". This seems to us to let business and industry off scot-free when they are likely to be releasing nutrients and other pollutants into the water course of East Hampshire and some could have a high water demand in their activities, putting more stress on an already high water-stress area. We are concerned about this seemingly 'hands-off ' approach to non-residential development.

#### **NBE14** Heritage assets and the Historic Environment

14.1 PeCAN would like to see a presumption in favour of sympathetically designed and installed retrofitting measures that will reduce a building's carbon footprint.

## **Section 7: Enabling Communities to Live Well**

### **HWC.1** Health and Wellbeing of Communities

At first glance, parts of Policy HWC.1 seem to overlap with Policy DGC2, which is confusing for the reader. For example, HWC.1b. and DG2.2a. both talk about connections from developments to local transport services. Policy HWC.1c. overlaps Policy DGC5. It is recommended that the scope of HWC is reviewed and amended in order to clarify the document thus making it easier to use.



Perhaps the scope of Policy HWC should be reduced such that it only requires developers to complete the Active Design Checklist and to prepare a Health Impact Assessment Health at an early stage in the planning process, while additional specific policy requirements about access to transport services, sports grounds etc are set out in Policy DGC2 and DGC5. Alternatively, there may be merit in collecting together transport related policies which should be looked at early stage of the planning process. This comment is linked to the following three comments.

Unless transport issues are considered from the earliest stages of preparing development proposals, opportunities to deliver sustainable transport solutions may be lost. We have seen local examples of opportunities to provide direct and attractive walking and cycling routes being overlooked and hence lost, also examples where transport issues are not fully considered at the Pre-app stage, leading to objections from the local community and delays. Paragraph 108 of the NPPF (Dec-2023) Section 108 recognises this need to consider transport issues at an early stage, but this need is not mentioned in Policy HWC, DGC1 or DGC2. If it is not covered elsewhere within this local plan, then a policy on this topic should be added.

Policy HWC.1a. appears to reference Sports England’s Active Design Principles which are relevant in this context, however the reference to these principles may not be clear to everyone.

Developers should be required to demonstrate that they have fully taken Sports England’s Active Design into account early in the design process. The following amendments are recommended to address both of these points:

- The Active Design Principles should be described in the supporting text that discusses Policy HWC.
- For all residential developments of 50 homes or more, developers should be required to demonstrate compliance with the Active Design Principles by completing Sport England’s Active Design Checklist and by providing robust evidence to demonstrate compliance (or provide an explanation of why compliance is not possible).
- The supporting text should also mention other planning guidance which is relevant in the early stages of planning for a large development. Active Travel England’s planning tool kit is also relevant (Active Travel England recently became compulsory consultees for developments of over 150 dwellings). Their checklist is more specific and detailed, which is useful because one or two poorly designed features can significantly degrade the amenity or safety of a walking or cycling route. In the context of urban streets, Healthy Streets design checklist is relevant and is referred to by HCC in their Local Transport Plan (LPT4).

Policy HWC.1c. mentions “blue corridors”. This term is not defined in the supporting text or in the Glossary. When this phrase is inserted into Google, references to migrating whales are provided! It is recommended that this term be defined.

Policy HWC.1.2 requires developers of schemes with 50 homes or more to prepare a Health Impact Assessment (HIA), but nothing specific is said about the content and methodology of such assessments. If authoritative guidance or requirements for such assessments is available then we recommend that it should be made clear that the developer’s HIA should comply with this.



## Section 8: Developing Green Connections

### DGC2 Sustainable Transport

DGC2.2a. requires “...linkages to existing or proposed transport infrastructure and networks,.....” but there is no requirement for these linkages to be safe or suitable for all users (as required in NPPF Para 114). Furthermore it is unclear whether this clause refers to public links through the site of a proposed development, or external links from the site to the local walking and cycling networks. PeCAN recommends more robust wording including the inclusion of a requirement for coherent, direct, safe, comfortable and attractive routes (reflecting the design principles set out in DFT’s Local Transport Note (LTN) 1/20). We also recommend the addition of text to encourage proposals that are ambitious in the extent of the routes, in order to facilitate a large-scale shift towards walking and cycling for everyday trips.

Policy DGC2.2b. requires “...attractive and well-designed walking and cycling networks..” but these terms are vague, open to various interpretations and so difficult to enforce. This should be addressed by specifying that the design should follow national design guidance (as required by NPPF (Dec-23) Para 114 Part c). We recommend more robust wording including specific references to national design guidance published by Government for streets, roads, cycling infrastructure and inclusive mobility and also HCC’s technical design guidance (Manual for Streets 1 and 2, Local Transport Note (LTN) 1/20, National Design Guide, HCC’s TG10 etc). Page 112 of HCC’s Local Transport Plan (LPT4) may be helpful in this respect.

Policy DGC2.2g. seeks to protect roads, but there is no protection for walking and cycling infrastructure. This is a concern because pedestrians and cyclists are vulnerable and we are aware of several local examples of development proposals that overlooked the degradation of long-established walking and cycling routes. PeCAN recommends the addition of the following clause:

“Development proposals must demonstrate the continued safe and efficient operation of the walking and cycling routes, including PRWs, permissive paths, trails, and footways. In the case of rural routes, their tranquillity and views should be preserved. Proposals for sensitively designed new routes and proposals to upgrade the safety of existing routes, will be supported. When opportunities are presented, existing infrastructure for walking and cycling should be brought up to current standards, rather than simply replacing like for like.”

Regarding Policy DGC2.2, policy clause g. is weakly worded. PeCAN recommends that it is replaced by a more robustly worded statement. NPPF Paragraphs 114 Part d) and 115 may be helpful. We propose the following phrase: “Does not have an unacceptable impact on highway safety, capacity or congestion, or the residual cumulative impacts on the road network would be severe.”

To widen the travel choice for residents, priority should be given to good walking and cycling links to local facilities that generate a significant number of trips (or by vulnerable groups: school children, the elderly etc), such as schools, nurseries, town/village centres, transport hubs, surgeries, large employment sites, community sports facilities etc. Currently this topic is not discussed within a policy statement or within the supporting text.

It would be helpful if DGC2 addressed these common problems by including these additional statements:



- The proposed street design should remove opportunities for indiscriminate and obstructive parking that would cause safety hazards and prevent access by active modes of travel.
- Streets, footways and cycle routes must be adequately lit at night to provide safety and security for all users.

These statements are based in part on the content of a document by Active Travel England called “Standing Advice Note: Active travel and sustainable development” which was published in 2023.

The supporting text for Policy DGC2 should explain that shared-use routes (i.e. a path or surface that is available for use by both pedestrians and cyclists) must be avoided along all new or improved streets, unless they fit within the limited acceptable situations listed in LTN 1/20.

(Developers and planning officers commonly assume that routes designated as being part of the National Cycling Network (NCN) are good quality routes for walking and cycling. However in 2018 Sustrans revealed that with 62% of on-road sections were classified as very poor (source: Paths for everyone Sustrans’ review of the National Cycle Network). Hence it should be explained that it cannot be assumed that routes which form part of the NCN are safe and well designed).

### **DGC3** New and Improved Community Facilities

We recommend that encouragement is given to the following types of planning proposals:

- Plans that re-vitalise town centres, neighbourhood centres and local villages, to encourage residents to live locally, where the development complies with other relevant policies in this local plan.
- Investment in walking, cycling, integrated public transport and new forms of shared mobility such as electric bikes and electric car clubs, to make local trips easier and reduce the need for private car ownership, where the development complies with other relevant policies in this local plan.

### **DCG5** Open Space, Sport and Recreation

The penultimate paragraph in Policy DGC5.1 mentions “the green network”, but this term is not defined, nor can it be found in the Glossary. Similarly, the term “place making” is not understood. These terms should be clarified.

Community sports events can generate a significant number of vehicle movements and can also create parking congestion. Hence we strongly support the first part of the last paragraph of Policy DGC5 (“*New provision should also protect, enhance.....*”). However the last part of this paragraph seeks to protect access to the wider countryside from potential damage from the creation of new public open space. PeCAN suggests that this protection be widened such that access to the wider countryside is protected from all forms of development. A clause such as the following should be added to DGC2: “Development proposals will be encouraged where they maintain or enhance established walking or cycling links to the wider countryside from towns and villages and which meet the needs of communities both within and beyond the site’s boundaries.”

### **General Comments About Section 8**



At an early stage in the planning process, the matters discussed in the following should be given full consideration.

- Opportunities for safe, step-free, fully accessible walking and cycling site access points must be maximised, and these should exceed the number of access points provided solely for motor vehicles (except where additional accesses would provide no benefit to people walking, wheeling and cycling).
- Within a site, routes for walking, wheeling and cycling should be shorter and more direct than the equivalent by car.
- Proposals should not prejudice the connectivity of existing and future development.

This text is based in part on the content of a document by Active Travel England called “Standing Advice Note: Active travel and sustainable development” which was published in 2023. These statements are phrased as policy statements and their inclusion is recommended. PeCAN suggests that inserting these bullets as a policy statement will give clear direction to developers to ensure that their development delivers sustainable and local travel.

NPPF (Dec-23) Paragraph 116 suggests that transport infrastructure for developments should give priority first to pedestrian and cycle movements, both within the scheme and within neighbouring areas. However, LPT4 Page 64 appears to suggest that such a statement is too adversarial, instead Policy C3 asks that appropriate consideration is given to the items in an ordered list of issues and modes, which is illustrated using the diagram borrowed from LPT4 that appears on Page 189. PeCAN recommends that an additional policy statement that is consistent with LPT4 Policy C3 is added to either Policy HWC or DGC2.

The diagram on Page 189 was taken from Page 57 of HCC’s LTP4 where an explanation of the diagram can be found. As this explanation is missing from this draft Local Plan, the purpose of this diagram is not clear. PeCAN recommends that the explanatory text from LPT4 is added near the diagram and that a reference to the diagram is added within the relevant text to emphasise that full consideration should be given to vulnerable users, people who walk, people who cycle etc, in the order of priority illustrated by this diagram.

Page 194 shows a photograph of four people cycling along a muddy track. While it is useful to have a photograph to highlight active travel, this photograph may unintentionally convey the wrong message in that it might be construed as suggest that unsurfaced cycle ways are acceptable for off-road cycle tracks. This is not the case. Unsurfaced cycle tracks pose a skid risk (source LTN 1/20, TG10). Unsurfaced tracks may be suitable for routes used by recreational cyclists on mountain bikes but they are not suitable for utility journeys of the type that this document is trying to encourage, especially for risk averse and less experienced cycle users. It is recommended that this photograph is replaced.

Table 8.1. This table proposes that the desired switch to more sustainable forms of transport is measured by analysing planning applications. PeCAN recommends that this key source of carbon emissions is monitored by directly counting trips for various modes (vehicles, pedestrians, cycling). EHDC should work with HCC to increase the number of permanent automatic cycling, walking and vehicle counters that are currently in operation in East Hampshire. Note that HCC gathers school travel data which is relevant, as is data on bus and train passenger numbers.



## Section 9: Homes for all

### General comments

The policies in this chapter, if implemented, should contribute indirectly to reducing carbon emissions and building/maintaining community resilience.

For example, H1.1 links the number of new homes to the settlement hierarchy and H1.2 locates housing within existing settlement boundaries, which would both reduce the number and length of car journeys and support active travel; H2.2 prioritises smaller homes for an ageing population, which would enable older people to down-size and decrease their operational carbon emissions; H3 and H4 will make it easier for different generations of a family to live closer together and for key workers to live nearer their work, also reducing journey times and increasing community resilience.

## Section 11: Development Management Policies

### DM1 The Local Ecological Network

PeCAN welcomes the strong emphasis on the protection and enhancement of natural habitat 'in perpetuity' during and following development. We have concerns regarding just how this will be adequately monitored over many years, given that Natural England is currently offering Standing Advice only. Hampshire does benefit from HBIC's database and maps, which are some of the most robust in the country.

### DM2 Trees, hedgerows and Woodland.

PeCAN welcomes the stated protection extended to ancient woodland, mature trees and hedgerows, in particular that these are given material consideration and can result in the refusal of planning permission.

### DM 3.3 Conservation areas

“consent to demolish a building in a Conservation Area will be permitted provided ...” There is no mention of e.g. bats living in these properties (unlike householders requesting planning permission). PeCAN's concerns regarding biodiversity and sustainability are not appropriately addressed here: Protected European Species surveys should be required for demolition proposals.

### DM 4 Listed Buildings

This policy should be amended to allow sympathetic retrofit measures at listed buildings, as far as legally permissible.

### DM 10.2 Locally Important and Non-Designated Heritage Assets

This states that planning permission will be granted after “historic desk-based study, or field evaluation in the case of archaeological interest,” has been carried out. Presumably also an assessment of the Local Ecological Network (LEN) which should be added here.

### DM 14 Public Art

We support that public art must use “low-embodied carbon or recycled materials”



#### **DM 15** Communications Infrastructure

PeCAN notes that here is no mention of materials; impact on wildlife or human health.

#### **DM16** Self and Custom Housebuilding

PeCAN suggests it should be clarified here that self and custom build developments are also subject to the relevant CLIM and NBE policies

#### **DM18** Residential extensions and annexes

This policy should clarify that CLIM 2.4 and 2.5 (operational emissions, existing buildings) apply.

#### **General comment**

We support the Dark Skies policy DM12. However, only DM22 mentions light spillage, yet this is relevant for all developments, especially otherwise dark, rural settings.

## **Appendix F: Vehicle Parking Standards**

Currently Appendix F does not require any parking for oversized cycles for standard residential dwellings, businesses, health establishments etc. Cycling should be accessible to people of all ages and abilities. The Equality Act 2010 places a duty on public sector authorities to comply with the Public Sector Equality Duty in carrying out their functions (Source LTN 1/20 section 2.4). LTN 1/20 recommends that 5% should be provide for non-standard cycles to accommodate people with mobility impairments (Section 11.3.2) in standard residential dwellings.

The size of vehicle parking spaces is specified but not for cycles. The space required for storing oversized cycles should comply with Section 7.4 of DFT's, Inclusive Mobility, December 2021. Guidance about space for storing standard cycles can be found in Cycle Parking Guide for New Residential Developments by Cambridge City Council (this useful document is referenced in the SDNPA's SPD on Sustainability).

Section 4 of Appendix F specifies a minimum size for garages, but this does not allow sufficient width to allow access to a cycle without first removing the car, hence this will deter cycle use. The dimensions should be increased.

PeCAN recommends that some text is added Appendix F to require cycle parking in residential developments to be designed to make it at least as convenient and attractive for residents to use cycles as a car when making local journeys. Storage should be as near to the street as possible.

PeCAN recommends that some text is added Appendix F to require short stay cycle parking to be both convenient for access and to be secure. Passive surveillance is essential. These topics are explained in LTN 1/20 Section 11.2.3.

PeCAN feels additional guidance should be provided in Appendix F on 1) types of parking stands by referring readers to LTN 1/20 and the Cambridge City Council document, 2) the need for surveillance to provide security. (Cycle theft is a significant problem which deters cycling).





PeCAN recommends that business sites with at least 10 employees should be required to provide cycle user showers and changing facilities, as well as secure cycle storage in accordance with BREEAM NC Tra 02.

The provision of such facilities is essential if cycling is to be a credible year-round travel choice. PeCAN recommends that a policy is added to encourage the provision of covered and secure cycle parking for use by the general public at locations which generate many trips will help to increase the uptake of cycling. Covered cycle parking is of increasing relevance because e-bikes are considerably more expensive than conventional cycles and are more susceptible to damage from water ingress.

ENDS

## Petersfield Cricket Club - Comments on Local Plan

Mon 04/03/2024 21:08

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

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

Dear Sir / Madam

At the Petersfield Cricket Club Committee meeting this evening we had a discussion about the Local Plan consultation and I was tasked to make a response this evening to meet your consultation deadline.

The Cricket Club recognises the importance of the plan making process and the vital role this will play in the future of our town and other communities in the area.

As a cricket club we are naturally concerned to make sure that the plan recognises the importance of sport and recreation to healthy communities and the role that this plays in the quality of life. This means that open space that allows people to engage in all sports both formally and informally is very important.

Petersfield Cricket Club currently plays matches on 2 sites in Petersfield. We have an historic ground at the Heath and this is used by our 1<sup>st</sup> Team, 2<sup>nd</sup> Team, Ladies W10 team, 7 different junior teams (boys and girls). In addition this ground hosts the All Stars and Dynamos national cricket programmes. This means that for 8 weeks in the summer on a Friday evening we have over 100 young people aged 5-11 learning the skills of cricket. In addition we hold junior cricket training on this ground on Mondays (with well over 60 young people (male and female) aged between 8 and 15 using the facilities. In addition we run a mid-week team and run adult training on Mondays (ladies) and Wednesdays (open). Our second ground is at Penns Place. With so much provision taking place at the Heath this is also a really important ground. This year our 3<sup>rd</sup> Team will be playing matches at Penns Place as will Purbrook Cricket Club. In addition other local clubs use this ground as well as Churchers College. In addition 4 junior teams run their matches from Penns Place and on a Friday evening the Under 9s and Under 11s train at Penns Place (with no room on the Heath with All Stars and Dynamos taking place). This is an extensive amount of cricket being played at the 2 grounds and it is vitally important that the Local Plan allows for the allocation of 2 cricket grounds in the town for the cricket club (including the Heath ground). Whilst Penns is really important as a facility, it would be possible, and maybe preferable, for a 2<sup>nd</sup> ground to be located very near to the existing Heath ground. This would require a change of use permission.

As a club we have ambitions to grow and develop and we also recognise the importance of investing in junior cricket. This is important for the health of our communities and also for the development of the community itself. As we grow and develop the importance of maintaining and developing our existing provision will become increasingly important. We therefore ask that the local plan makes sure that any development does not put at risk our provision and also helps achieve our ambitions for growth. We also recognise the importance of open space for informal play. Our grounds are open access and allow people to use them for this informal play and recreation. It is important that the local plan enhances access for local people to informal recreation space.

The committee would be happy to provide more information if required

Thank-you for the opportunity to comment



Petersfield Cricket Club

[REDACTED]  
East Hampshire District Council

4 March 2024

By email only

**Re: East Hampshire District Council - Local Plan 2040 - Portsmouth City Council response**

Thank you for consulting Portsmouth City Council (PCC) on the emerging East Hampshire Local Plan (2021-2040) published for Regulation 18 Consultation. The City Council would like to make the following comments.

**Climate Emergency**

Portsmouth City Council support the emphasis placed on the need to respond to the climate emergency as set out within draft Policies CLIM1, CLIM2, CLIM3, CLIM4 and CLIM5.

**Housing need**

PCC support the statement made in paragraph 9.13: *Any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for. As detailed in the 'Partnership for South Hampshire Spatial Position Statement' (December 2023), there is a large amount of unmet housing need within South Hampshire.*

The housing requirement and proposed housing strategy allocation detailed in draft Policy H1 shows there to be an expected surplus supply of 643 homes over the plan period. The draft Pre-Submission Portsmouth Local Plan sets a housing requirement target of 13,603 new homes from 2020 to 2040 or approximately 680 new homes per year. PCC has an unmet housing need of 4,377 homes over its plan period, to 2040, based on an identified need calculated using the Standard Methodology of 17,980 new homes (899 per year). PCC is in the process of exploring whether neighbouring and nearby local authorities can assist in meeting unmet housing needs of the City, under the Duty to Cooperate, and has formally written to East Hampshire District Council on this matter on 30 January 2024. PCC await your response and would welcome the opportunity to discuss the surplus supply of housing land identified in East Hampshire's draft Local Plan at the earliest opportunity.

**Gypsies and Travellers**

Paragraph 3.14 sets out identified need for 66 Gypsy and Traveller Pitches, as well as 47 Travelling Showpeople plots to 2036. However, draft Policy S1 Spatial Strategy (and the relevant site allocations) highlights that only 2 permanent pitches for Gypsies and Travellers, and 12 permanent plots for Travelling Showpeople are provided for in the plan. This falls

significantly below the level of identified need, and would need to be justified with regard to available, suitable land supply. This should be considered with particular attention to the surplus land supply identified for housing. The impact of such significant under provision of land to meet the accommodation needs of Gypsies and Travellers could have cross boundary impacts across the sub-region and PfSH area, and raises concern.

### **Natural and Built environment**

The City Council supports the inclusion of all policies which seek to safeguard the natural and built environment. PCC agree with the statement highlighting the existing strong track record of partnership working between Natural England and neighbouring local planning authorities to investigate and prevent harm to nature conservation designations. PCC is keen to continue to work with East Hampshire District Council and other partners on delivering appropriate responses to protecting and enhancing biodiversity within Hampshire.

### **Infrastructure**

PCC support the statement within Policy DCG1 highlighting the importance to work with adjoining local planning authorities and county councils on any cross-boundary infrastructure issues. The City Council welcomes ongoing discussions and co-operation to ensure the relation with East Hampshire remains strong and efficient transport links remain in place to allow easy travel to and from.

### **Transport**

PCC is a joint promoter of the South East Hampshire Rapid Transit (SEHRT) programme together with partners including Hampshire County Council and public transport operators. SEHRT is a shared plan for development of a bus rapid transit network serving the Portsmouth City Region, across five key corridors, including Portsmouth to Waterlooville and Portsmouth to Havant/Leigh Park, as links across the Solent to the Isle of Wight. More information about the SEHRT network can be found at <https://www.sehrt.org.uk/>. Bus priority and enhanced interchange facilities already exist for a significant part of this network and additional bus priority and improvements to passenger facilities along these corridors continue to be delivered incrementally (currently funded through the Transforming Cities Fund and through Bus Service Improvement Plan funding) and it is intended that this staged delivery will continue in future.

The SEHRT programme is identified in Transport for the South East's Strategic Transport Investment Plan and is referenced in the 2023 PfSH Spatial Position Statement (as one of the mass transit networks serving the city regions in South Hampshire identified in paragraph 6.20). It has been identified by partners across the Portsmouth city region as one of the major sustainable transport interventions that is required to ensure new development in the area supports shared objectives including reducing carbon emissions and reducing car dependency.

PCC notes that the draft EHDC Local Plan proposes to allocate around 616 dwellings in the area south of the South Downs adjoining Havant/ Waterlooville (141 north of Havant and 476 in Clanfield/Horndean/Catherington areas). These sites will be within the Portsmouth Travel to Work area and, based on travel patterns from existing developments adjacent to these sites, are likely to generate travel demand towards Portsmouth. The proposed allocated sites for many of these dwellings will be close to the SEHRT corridors (particularly Portsmouth-Waterlooville- Clanfield/ Wecock Farm) and some (most notably land at Drift Road - site CFD2) will be located directly on the SEHRT network.

The draft EHDC Local Plan does not currently recognise the SEHRT programme or

network. PCC believes it is a relevant transport intervention/mitigation supporting development in the areas identified above. PCC requests that Policy DC1, and potentially some of the site/ allocation-specific policies, are updated to make reference to the SEHRT programme/ network and the relevance of this to some of the allocations identified.

Yours sincerely

[Redacted signature block]

Email:

[Redacted email address]

# The River Wey Trust

A Charitable Incorporated Organisation. Registered No. 1177871



[www.riverweytrust.org.uk](http://www.riverweytrust.org.uk)



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

**11<sup>th</sup> February 2024**

**Re: Comment on the 2024 Draft East Hampshire District Council Local Plan**

**Dear East Hampshire District Council Planning Policy Team**

**We confirm that The River Wey Trust has submitted via the January 2024 Draft East Hampshire Local Plan Portal our comment on the proposal to allocate site reference LIP 1 for development.**

**For your ease of reference, we include in this letter our detailed comments.**

**We reiterate that we are now formally requesting that the site allocation reference LIP 1 be removed from the Draft Local Pan for the reasons stated.**

**Yours faithfully**



**The River Wey Trust**



# The River Wey Trust

A Charitable Incorporated Organisation. Registered No. 1177871

[www.riverweytrust.org.uk/](http://www.riverweytrust.org.uk/)

## RWT Comment on January 2024 Draft East Hampshire Local Plan issued for public consultation <https://ehdclocalplan.commonplace.is/>

Land North of Haslemere Road Liphook pages 405,406 & 407

In this draft EHDC plan there is a proposal to use the site [ref LIP 1] shown below to construct 24 houses. The problem is that the bulk of the site is within the River Wey Conservation Area [RWCA]

Conservation areas are a well-established designation employed by local planning authorities, including East Hampshire District Council, to manage areas of special architectural or historic interest.

Due to space constrictions, it would not be possible build houses next to Haslemere Road, so all the proposed new houses would be built inside the RWCA. The RWCA was designated by EHDC in May 1983 in recognition of its importance to the conservation of a historical landscape and its wildlife.

One of the RWCA stated conservation objectives is that *“the area is valued for its largely rural historic landscape that was created for farming and industrial (18/19th century) purposes.”* It is inconceivable that modern housing development is compatible with the RWCA conservation objectives, particularly conservation of an attractive rural environment, its biodiversity, and the water quality of the River Wey.

There is no possible way that any biodiversity enhancement by the developers within the Conservation Area could mitigate the loss of fauna and flora which include regular sightings of owls, bats, deer, badgers, foxes, and a multitude of bird species. A housing development on this site would seriously affect the effectiveness of the current wildlife corridor so important to conservation.

On page 406 under the heading of Built heritage item 5 EHDC emphasises the importance of this Conservation Area. The proposal contradicts the EHDC statement that the RWCA is valued.

- **Built heritage (5):** majority of the site lies within the designated River Wey Conservation Area, which is valued for its largely rural historic landscape that was created for farming and industrial purposes.

Conservation areas exist to manage and protect the special architectural and historic interest of a place - in other words, the features that make it unique. The proposed site for allocation of 24 houses is an integral part of the RWCA and any development would have a detrimental effect on this historic, scenic and wildlife friendly special area.

Sustainability is part of the whole integrated history and landscape of the River Wey Trust. Any development will have a detrimental effect on the River Wey Trust’s activities.



The Draft Local Plan acknowledges significant constraints for a sustainable drainage system [SuDS]. Any building in the LIP 1 site will result in increased surface run-off both during and after construction polluting the environmentally sensitive River Wey. Flood risks downstream will also be increased.

The River Wey Trust is a charity which was established in 1984 to coordinate historical, environment and wildlife conservation and management along the southern branch of the River Wey for the education and benefit of the public.

We consider the construction of dwellings on the LIP 1 site will directly affect our aims and objectives and the status of this important Conservation Area.

**Accordingly, The River Wey Trust formally requests that this site allocation is removed from the Draft Local Plan.**

**LIP1 – Land north of Haslemere Road, Liphook**

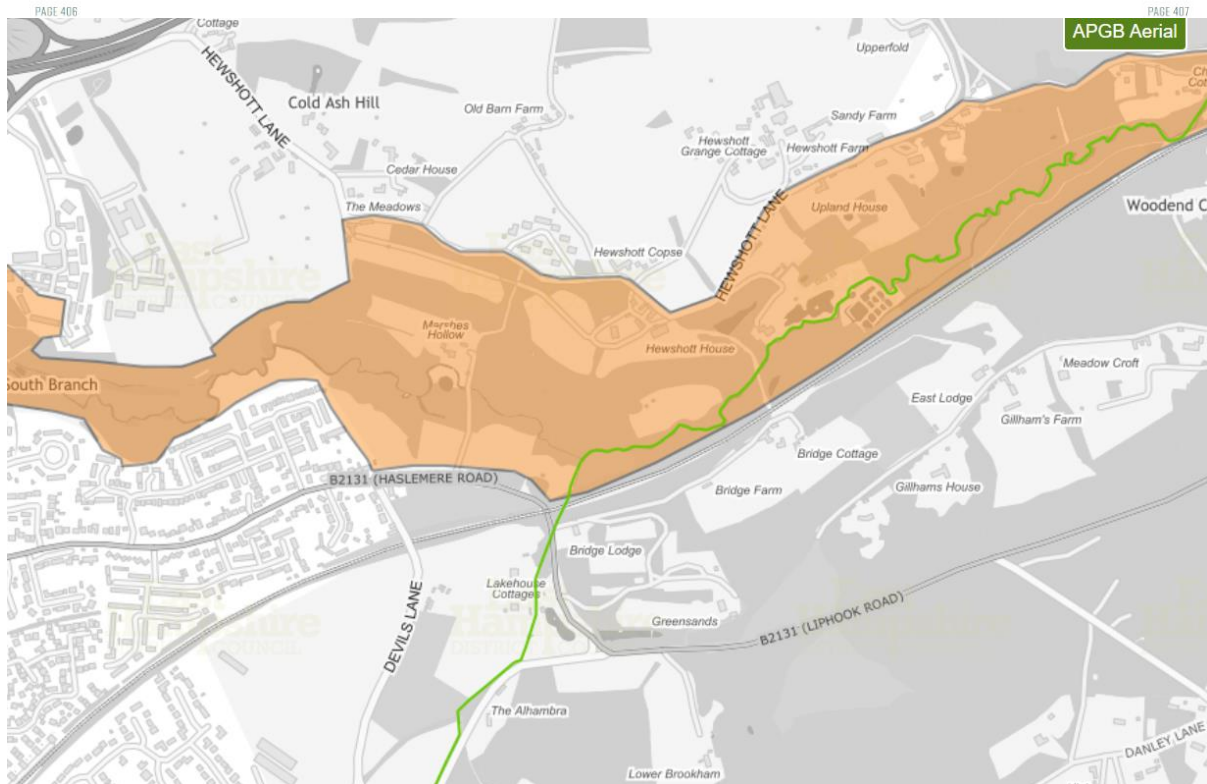
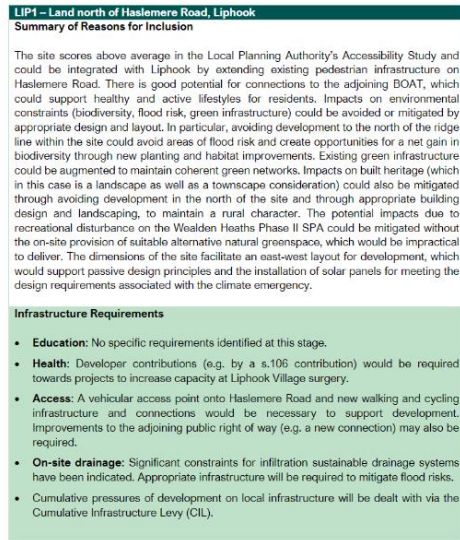
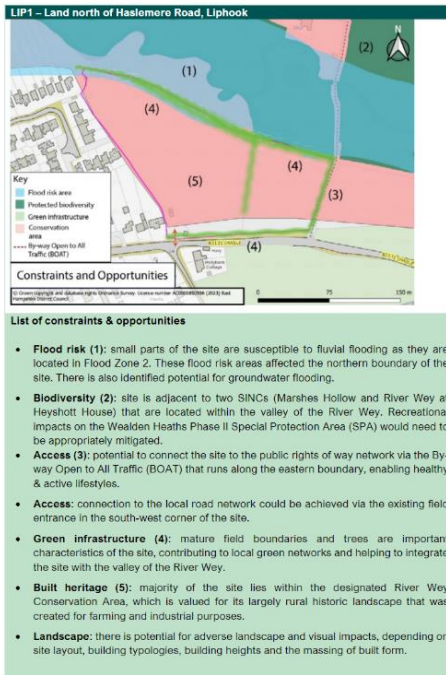
LAA Reference	LIP-005
Site Size (Ha)	2.5 ha
Existing Use	Agriculture
Proposed Future Use	Housing
Proposed Number of Homes	24



**Site Description**

The site is located on the north-east edge of Liphook. Its western boundary adjoins a residential area, whilst the Haslemere Road and a public right of way form the southern and eastern boundaries respectively. The River Wey is located to the north. Land to the north and east of the site is undeveloped.

The site is greenfield pasture but contains extensive vegetation, including mature hedgerows and trees that form part of a wider green network of woodland within the River Wey valley. The land slopes down towards the River Wey, with a notable ridge traversing the site from north-west to south-east. There is a field entrance (gated) on the Haslemere Road and an existing access track on the eastern boundary. Boundaries include mature shrubs and trees, with occasional views into the site from Haslemere Road. Housing to the west and south is predominantly of detached houses on plots that show wide variations in their size and orientation.



Planning Policy  
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**By email only:** [localplan@easthants.gov.uk](mailto:localplan@easthants.gov.uk)

7<sup>th</sup> March 2024

Dear Sir/Madam

**Re: East Hampshire Local Plan 2021-2040 consultation – Regulation 18 – January 2024**

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Thank you for consulting the Royal Society for the Protection of Birds (RSPB). The RSPB continues to engage with the development of East Hampshire District Council's (EHDC) Local Plan to seek the appropriate protection of the internationally important designated sites within and near the District. We have reviewed the East Hampshire Local Plan 2021-2040 Regulation 18 January 2024 ("the Local Plan") document and its associated supporting documents and have concerns regarding the protection of Designated Sites. The RSPB has summarised its key concerns below, and further details can be found in both **Appendix 1** (EHDC Local Plan) **and 2** (EHDC Local Plan Habitats Regulations Assessment) of this letter.

Critically, the RSPB is concerned at the lack of policy and protection afforded the Wealden Heaths Phase I (Thursley, Hankley, and Frensham Commons) SPA within the Local Plan, and the lack of consistency in the application of mitigation proposals for new development within 5km of the Wealden Heaths Phase II SPA.

We hope you find these comments useful. We would welcome the opportunity to discuss these comments with you in further detail. The RSPB would also welcome the opportunity to meet with EHDC and Waverley Borough Council to discuss the potential for a Wealden Heaths SPAs Mitigation Strategy. Further detail can be found within **Appendix 1, Section 1**.

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RSPB England – Brighton Office

[rspb.org.uk](http://rspb.org.uk)



The RSPB is part of BirdLife International, a Partnership of conservation organisations working to give nature a home around the world.

Yours sincerely



## **Appendix 1: RSPB comments on East Hampshire Draft Local Plan 2021-2040 document**

### 1. Policy NBE4: Wealden Heaths European SPA and SAC Sites

#### Net dwellings of 49 units and less

Para 5.35 (p.102) of Policy NBE4 states:

*'For net new dwellings of 49 units (net) and less a financial contribution is required which will go towards Strategic Access Management and Monitoring (SAMM) on the SPA/SACs. Dependent on the location, type and size of the proposed development additional forms of mitigation may be required and will be assessed on a case-by-case basis.'*

The provision of Strategic Access Management and Monitoring (SAMM) in isolation has been shown as not sufficient to fully mitigate the impacts of recreational disturbance as a result of development across other heathland SPAs and other sensitive habitat types and their designated sites. Other examples of mitigation strategies include the Thames Basin Heaths Partnership, Bird Aware Solent, and Dorset Heaths Partnership. These partnerships contain elements of mitigation in addition to SAMM such as Suitable Alternative Natural Greenspaces (SANGs), Site Specific Projects (SSPs), and Heathland Infrastructure Projects (HIPs), respectively.

The RSPB does not consider there to be any evidence provided to support a situation where the provision of solely SAMM can effectively and fully mitigate recreational disturbance impacts to Designated Sites as a result of new development.

#### Wealden Heaths Phase I (Thursley, Hankley & Frensham Commons) SPA

The RSPB is concerned with the lack of policy within NBE4 (*Wealden Heaths European SPA and SAC Sites*, p.101) of *The Local Plan* addressing potential impacts on the *Thursley, Hankley & Frensham Commons SPA (WHPI SPA)*. Although only one strategic development site has been identified within a 400m-5km radius from the WHPI SPA, there is the potential for applications for development outside of *The Local Plan* to come forward with no clearly identified policy protecting WHPI SPA from the impacts of new development. Conversely, no adverse effect on integrity on the Thames Basin Heaths SPA has been identified under the Local Plan, which has policy NBE5 (p.104) outlining the needs for a Habitats Regulations Assessment (HRA) for development proposals. The RSPB is concerned with the lack of consistency in the approach taken by EHDC for the protection of the suite of SPAs with a 5km buffer zone within the boundary of the District.

Further to the above, we are unsure why the WHPI SPA has been referenced in para 5.32 (p.100) under the heading '*Why we need this policy*' but has not been included in the policy wording within Policy NBE4.

### *Proposal for a Wealden Heaths SPAs (Phase I and II) Mitigation Strategy*

The internationally important Designated Sites of the Wealden Heaths Phase I (Thursley, Hankley and Frensham Commons) SPA and Wealden Heaths Phase II SPA are a prominent feature across the boundaries of East Hampshire District and Waverley Borough, designated for internationally important populations of the same three ground-nesting birds of Nightjar (*Caprimulgus europaeus*), Dartford Warbler (*Sylvia undata*), and Woodlark (*Lullula arborea*).

The RSPB implores EHDC and Waverley Borough Council (WBC) to work collaboratively towards the implementation of a Wealden Heaths-wide Mitigation Strategy to address recreational disturbance impacts on the SPA as a result of an increase in development across the two councils. The RSPB is of the opinion that a joint-up approach to mitigation has the potential to provide the opportunity for a full suite of mitigation provision options to be explored by EHDC and WBC whilst also streamlining the process for assessing mitigation requirement for new development within both strategic sites in the Local Plan and applications outside of the Local Plan process.

The RSPB would welcome the opportunity to provide support and guidance throughout the process of identifying options for a Wealden Heaths-wide Mitigation Strategy.

## 2. Section 12: Site Allocations

### *HOP1 – Land north of Fullers Road, Holt Pound*

HOP1 lies approximately 3.6km from the WHPI SPA. Within the List of constraints and opportunities under the category *Biodiversity* (p.471) EHDC have identified that:

*'Recreational impacts on the Wealden Heaths European SPA & SAC sites would need to be appropriately mitigated'.*

However, under the *Summary of Reasons for Inclusion* EHDC follows with the statement:

*'The potential impacts due to recreational disturbance on the Wealden Heaths Phase I SPA could be mitigated without the on-site provision of suitable alternative natural greenspace, which would be impractical to deliver.'*

The RSPB considers that this statement for strategic site HOP1 fails to provide any detail on what mitigation could be provided in order to guarantee beyond all

reasonable scientific doubt that the mitigation will mean that the project will not adversely affect the integrity of the WHPI SPA, and therefore would not comply with the Habitats Regulations<sup>1</sup>.

### HED1 – Land at Middle Common

The boundary of HED1 lies within 400m of the WHPII SPA. The *Summary of Reasons for Inclusion* section (p.469) states:

*'The potential impacts on the Wealden Heaths Phase II SPA could be mitigated by avoiding development within the 400m buffer zone.'*

The RSPB would like to clarify the potential for ambiguity within this sentence. Although the construction of residential development outside of 400m may avoid impacts on the WHPII SPA from development-related sources such as cat predation, it does not preclude the ability for impacts on the WHPII SPA in relation to light, noise, and vibration from any other form of construction within 400m of the WHPII SPA.

### 3. NBE3: Biodiversity Net Gain

Advice to Defra from members of the Natural Capital Committee suggests that a level of net gain at or above 10% is necessary to give reasonable confidence in halting biodiversity losses. Therefore, 10% sits as an absolute minimum level of net gain for Defra to confidently expect to deliver genuine net gain, or at least no net loss, of biodiversity and thereby meet its policy objectives. Defra's Biodiversity Net Gain Consultation Impact Assessment<sup>2</sup> also highlights examples of an increase in the required percentage of net gain: *'The Planning authority for Lichfield District requires a net gain of 20% on new development, and experience to date suggests that developers are able to meet this requirement and often achieve much greater levels of biodiversity net gain.'*

The RSPB therefore encourages EHDC to implement policy around Biodiversity Net Gain with a suggested minimum of 20% in order to gain a greater level of certainty for genuine net gain as a result of Biodiversity Net Gain policy and to see tangible net gain benefits for key priority species and habitats in the East Hampshire District. Further information on the recommendation for 20% Biodiversity Net Gain can be found on the Surrey Nature Partnership website<sup>3</sup>.

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<sup>1</sup> The Conservation of Habitats and Species Regulations 2017

<sup>2</sup> Biodiversity Net Gain Consultation Impact Assessment, Defra 2018, Page 19.

<sup>3</sup> Recommendation for adoption of 20% minimum biodiversity net gain across Surrey's planning sector: a Surrey Nature Partnership Position Statement. Surrey Nature Partnership, November 2020



## **Appendix 2: RSPB comments relating to East Hampshire Local Plan Habitats Regulations Assessment (HRA) Regulation 18**

### **1. Wealden Heaths Phase II SPA, Woolmer Forest SAC and Shortheath Common SAC**

The RSPB has serious concerns regarding paras 6.18 and 6.20 (p.56) which outline that:

*'any individual sites within 5km of the SPA which allocate 50 or more dwellings may require bespoke SANG. The rest of the development within 5km can be addressed through a combination of SAMM and/or WHIPS', and*

*'For these developments [less than 50 dwellings], a SAMM and/or a WHIPs approach is being explored'.*

The RSPB considers that these paragraphs and the overall strategy for mitigation does not provide adequate confidence in the ability for impacts on the WHPII SPA as a result of development to be mitigated within The Local Plan. Without a complete package of measures to address impacts on the WHPII SPA for all developments of variable unit sizes, the RSPB concludes that the Local Plan is unable to comply with the Habitats Regulations and the National Planning Policy Framework<sup>4</sup>.

The RSPB acknowledges the conclusions of the HRA that Likely Significant Effects (LSEs) of the Local Plan on the WHPII SPA cannot be excluded (para 7.5, p.64) and agrees with this statement. The HRA must be particularly robust to a high standard of investigation, based on the best up-to-date scientific knowledge and not based on assertion of the function of an undefined SAMM and/or SANG/WHIP provision. In all, the assessment can have no gaps, and must contain complete, precise, and definitive conclusions capable of removing all reasonable scientific doubt as to the effects of the proposal on the site. Until a fully detailed package of mitigation has been provided within the Local Plan and its policies, the RSPB is of the opinion that the Local Plan fails to comply with the Habitats Regulations.

### **2. Thursley, Hankley & Frensham Commons SPA and Thursley, Ash, Pirbright & Chobham SAC (Wealden Heaths Phase I)**

#### 400m-5km mitigation requirements

Para 6.29 (p.58) states:

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*'Natural England have identified a core recreational catchment for the SPA of 5km, including a 400m development exclusion zone and a 400m – 5km mitigation zone. Within that mitigation zone, developments comprising 20 dwellings or fewer do not require mitigation. Flexible mitigation should be provided for developments between 21 – 49 dwellings and bespoke SANG must be identified for developments of 50 dwellings or more. There are presently no SAMM requirements for the site.'*

The RSPB welcomes a 400m development exclusion zone, as urban effects cannot be effectively mitigated within this distance. This has been corroborated by Natural England and by planning inspectors at a number of public inquiries. However, no evidence or justification has been provided as to why residents from smaller developments of 20 dwellings or fewer do not require mitigation, nor have in-combination impacts been assessed regarding the accumulation of new development within 5km of the WHPI SPA within both EHDC and WBC.

In addition, it is unclear what the definition of 'more flexible' Wealden Heaths Infrastructure Projects is, and any justification behind its provision for developments between 21 and 49 dwellings in size. This approach is inappropriate and fails to reflect the evidence base on recreational disturbance and the legal requirements of the Habitats Regulations and requirement to appropriately protect the SPA from harm. We urge the Council to adopt a consistent and appropriate approach for all net new residential dwellings within the zone of influence (400m-5km) requiring the need for avoidance and mitigation measures; without such an approach the RSPB does not consider that EHDC is able to conclude no significant effects on the integrity of the Wealden Heaths SPAs.

Para 6.30 (p.58) states:

*'The Thursley, Ash, Pirbright & Chobham SAC is covered under the mitigation strategy for the Thames Basin Heaths SPA'.*

The RSPB does not consider this statement to be true. Whilst the paragraph details information regarding SAMM and SANG provision, this is provided for the Thames Basin Heaths SPA and does not include any delivery on Thursley. Thursley National Nature Reserve does not currently have any mitigation strategy associated with the designation, as per the rest of the Thursley, Hankley & Frensham Commons SPA.

Para 6.33 (p.58) states that site BIN-005 (Land north of Fullers Road) is:

*'within 200m of Alice Holt Forest. Alice Holt is 347 ha of forest which is well provisioned with walking trails, a well-being trail and activity centre with health and fitness activities.'*

The RSPB considers this point to be irrelevant to the need for mitigation from an increase in residents within 5km of the Wealden Heaths Phase I and II SPAs as the core function of mitigation for potential impacts upon SPAs. Alice Holt Forest

has not been created and managed as an alternative site for recreation to the Designated Sites, and therefore has no requirement to provide this role for new development in the area. The Local Planning Authority (EHDC) must be able to guarantee beyond all reasonable scientific doubt that mitigation will mean that the project will not adversely affect the integrity of the Site. The RSPB does not consider the above statement to provide this level of certainty.

### 3. Incomplete assessment of potential impact pathways

The RSPB does not consider the HRA document to be a complete assessment of the potential impact pathways for the Wealden Heaths Phase II SPA, Woolmer Forest SAC, Shortheath Common SAC, and East Hampshire Hangers SAC. The HRA document fails to consider wider urbanisation effects or justify why these have been excluded from consideration for the heathland sites, especially Wealden Heaths Phase II SPA, Woolmer Forest SAC, and Shortheath Common SAC. Examples of urbanisation effects on heathland sites include cat predation of designated feature species (notably ground-nesting birds for SPAs) and habitat change as a result of fly tipping / garden encroachment, fire etc. It is essential that a comprehensive assessment of the potential impact pathways is undertaken to provide a robust assessment of LSE of the Local Plan on relevant sites. It is very concerning that these established impacts have been disregarded; they must be considered of any assessment.

### **Appendix 3: The RSPB's interests in East Hampshire**

The East Hampshire District lies within the RSPB's Thames Basin and Wealden Heaths Priority Landscape, identified as of national importance for the work of the RSPB. This is one of our highest priority places in the UK for the promotion of conservation at a landscape-scale, adopting the principles advocated by the Lawton report *Making Space for Nature* (2010)<sup>5</sup>, which recommended (in simple terms) more, bigger, better and more joined up protected areas.

East Hampshire contains important statutory nature conservation designations, including the Wealden Heaths Phase II Special Protection Area (SPA); Woolmer Forest Special Area of Conservation (SAC) and Shortheath Common SAC; and a number of Sites of Special Scientific Interest (SSSIs). A number of nature conservation designations also lie in close proximity to the Council's area boundary, including the Wealden Heaths Phase I (Thursley, Hankley & Frensham Commons) SPA, Thames Basin Heaths SPA, and Thursley, Ash, Pirbright and Chobham SAC.

Due to their proximity these sites should also be considered for potential impacts as a result of the Local Plan and strategic planning and policies within East Hampshire District. The RSPB regards the protection and enhancement of the SPAs, SACs, and their associated and surrounding SSSIs as being among the highest priorities for our work nationally.

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<sup>5</sup> Lawton, J.H., Brotherton, P.N.M., Brown, V.K., Elphick, C., Fitter, A.H., Forshaw, J., Haddow, R.W., Hilborne, S., Leafe, R.N., Mace, G.M., Southgate, M.P., Sutherland, W.J., Tew, T.E., Varley, J., & Wynne, G.R. (2010) *Making Space for Nature: a review of England's wildlife sites and ecological network*. Report to Defra.



06/03/2024

# East Hampshire Local Plan 2021-2040

Consultation response

**SMASH**

Stand with Medstead Against Speculative Housing

## CONTENTS

- 1.0 Introduction
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## 1.0 Introduction

- 1.1 SMASH (Stand with Medstead Against Speculative Housing) is submitting this document; a local community led action group in response to the East Hampshire District Council Local Plan 2021-2040 Regulation 18-Consultation 2024.

## 2.0 Executive Summary

- 2.1 In general, we support the majority of the Plan with some reservations.
- 2.2 We believe that housing numbers, as calculated by EHDC, are too high, overstated and double counted in places. The buffer of 643 should be removed or substantially reduced.
- 2.3 The Ridge methodology for assessing Settlement Hierarchy tiers, although not perfect, is quantitative, plausible, and welcome.
- 2.4 Using this methodology Four Marks/'South Medstead' is designated Tier 4. However, EHDC have arbitrarily designated it as Tier 3 which we strongly object to.
- 2.5 We object to EHDC's redrawing of the Settlement Policy Boundary (SPB) along Hussell Lane, Wield Road, and Five Ash Road, Medstead.
- 2.6 Four Marks and Medstead *are not* sustainable locations as stated.
- 2.7 We support the spatial strategy sections 03 and 12 and the designation of Neatham Down Farm as a strategic sustainable site. Care should be taken on the design and layout of this site.
- 2.8 Site allocations identified in Four Marks/'South Medstead' all need major mitigations if they are to be permitted.
- 2.9 Surface water flooding is a serious concern in both villages. Its impact should not be underestimated.
- 2.10 Character preservation of our villages is paramount. The Plan needs to defend this aspect more than it does.
- 2.11 Detailed constructive comments have been made on specific policies in the Plan in support of the above.
- 2.12 SMASH declare that they have provided evidence to and are in agreement with the Four Marks and Medstead Neighbourhood Planning Steering Group's (NPSG) Local Plan submission.

### 3.0 Overall Plan position

- 3.1 We cautiously support the plan and its policies, see more comments later in this document.
- 3.2 We understand that the plan needs to be adopted in order to bring some certainty to the future housing development planning in EH and to avoid mass uncontrolled, speculative development. We also recognise that the latter is governed by the attainment of a 5-year Housing Land supply (5YHLS) or 4YHLS in this case, up until adoption of the Plan.
- 3.3 We understand that EHDC has used the “ Standard Method” to determine the total number of dwellings required and have disaggregated the overall figures due to the presence of the South Downs National Park Authority (SDNPA).
- 3.4 Whilst every plan should have a contingency we believe that 643 in this plan is too high and unjustified.
- 3.5 If the housing numbers were reduced then there would be no need for some of the allocations cited.
- 3.6 The words in some of the policies appear ambiguous such that developers and barristers could exploit them. Policies should be legally reviewed to avoid this risk.
- 3.7 Out of courtesy we inform you that we have contributed to the Neighbourhood Plan Steering Group’s (NPSG) submission to the consultation and fully support their findings.

### 4.0 Housing Numbers

- 4.1 We accept that the government advises the use of the ‘standard method’ as the starting point for all planning authorities to calculate their housing numbers. This leads to a total requirement for East Hampshire of 10,980 over the 19-year plan period which includes the South Downs National Park Authority (SDNPA). It would be helpful in the plan to have a clear breakdown of how all the figures have been calculated.
- 4.2 54% of this figure 3,857 derives from the *current* Affordability Ratio which is part of the standard method calculation.



- 4.3 Assuming that SDNPA will build 17% of this total (100 dwellings per annum over 19 years), then the LPA requirement is 83% of the total, i.e. 9,082 or 478 per annum.
- 4.4 The plan states that the following has already been allocated, these include those with existing planning permission (3,965), completions (940) and expected windfall sites (1,320). Hence the working number required is 9,082 minus 6225 which is 2,857.
- 4.5 However, EHDC then, without justification of the number, add a buffer of 23%, i.e. 643 houses to this figure to meet potential unmet need from the SDNPA, other authorities and any allocated sites that fail to deliver. This gives a figure of 3,500 dwellings required. This figure is overstated and unnecessary. We believe that this overage should be removed, but if this is not acceptable to remove it entirely, then we suggest a buffer of 5%, i.e. an additional 143 (for 5%) thus giving an overall requirement of 3,000 and not 3,500.
- 4.6 This overage assumes that the LPA will take some unmet need from other neighbouring areas and that other authorities will not reciprocate or that the SDNPA will not build what they said they were going to build. This strategy is overly cautious.
- 4.7 We believe that the LPA should put an upper cap on what they are prepared to commit to as unmet need (particularly the SDNPA) in order to encourage them to meet their own need and not rely on the already stretched LPA.
- 4.8 Our conclusion is that the 643 overage is not required or at the very least should be significantly reduced not least as the Affordability ratio already generates 3857 over and above the predicted local household growth. The housing requirement number should therefore be 8,439 or 444 per annum, if it was removed altogether.
- 4.9 Reducing the housing requirement number would negate the need for some of the site allocations in the plan.
- 4.10 Note in the NPPF, the housing numbers the LPA is expected to build are now no longer *mandatory* and are for guidance only. It is in the control of the LPA to amend these if it so wishes.

- 4.11 The above argument shows that the overage is too high and should be reassessed by EHDC.
- 4.12 The number of houses being allocated to Four Marks/'South Medstead' (210) is too high, considering that over recent years over 550 dwellings (compared to JCS allocation of minimum 175 up to 2028) have been built here, with an additional 60+ with planning permission. Please see Appendix 3 which shows past Inspectors findings in support of this position.

## 5.0 Settlement Hierarchy

- 5.1 East Hampshire's strategy is to focus future growth in higher level, larger settlements i.e. Tier 1 and Tier 2 where there is greater access to public transport, services, and amenities (ref. policy S2 paragraph 3.36 - implementing policy)
- 5.2 Four Marks/'South Medstead' (FM/'SM') have been designated in Tier 3 of the Hierarchy. Tier 3 settlements will generally provide a focal point for surrounding villages and rural areas in terms of provision of local services and facilities (ref. S2 paragraph 3.38)
- 5.3 The Ridge report provides a basis for determining a settlement's place in the Settlement Hierarchy. It uses a methodology based on 'accessibility' to score each settlement. This methodology is plausible, quantitative, and reproducible. One subjective flaw maybe where exactly the author places the central 'hexagon' to anchor a settlement's focal centre. By and large these are intuitive.
- 5.4 In the case of FM/'SM' however, the centre is designated as Oak Green on the A31 where the shops are located. However, because the village is very linear and spread out along the A31, these facilities, along with some of the other village facilities e.g. playing fields, primary school are not within a 10-minute walk - which is the distance that the Ridge Report states is the time that a resident is willing to walk before resorting to their vehicle.
- 5.5 The Ridge average accessibility score is 13.9 and puts FM/'SM' into Tier 4 (range 11 to 15 inclusive).

- 5.6 However, EHDC promotes the settlement up to Tier 3 by using the settlement's relatively high population.
- 5.7 The population argument cited in the Settlement Hierarchy Background Paper states, "*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.*"
- 5.8 We don't accept the basis of this premise and feel that it is counter intuitive as if the facilities are fairly limited, which they are in FM/'SM' then just by adding more population it means new residents simply drive to other settlements where there are more/better facilities. Furthermore, we would argue that FM/'SM' is not "*at the top of one tier*" as stated above. The settlement scores 13.9 (in the tier that starts at greater than or equal to 11) and the next tier up, starts at greater than or equal to 16.
- 5.9 Following the above reasoning, we note that once again (as in 2023 Settlement Hierarchy Background Paper), FM/'SM' is singled out to have its scored tier rating modified adversely (i.e. upwards).
- 5.10 Incidentally, the same applies to Rowlands Castle.
- 5.11 Even the Ridge Report 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.*" With reference to the table below and Appendix 2, which shows data for the retail and some leisure facilities in FM/'SM' and also in Alton, it can be clearly shown that by taking into account the differing populations of the two settlements, then FM/'SM' per capita, 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 (as a number)	Theoretical Shortfall in facilities in FM/SM (as a %)
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%

5.12 Additionally, it is important to understand the reason the accessibility score for FM/’SM’ is low. It is due to intense housing 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 population is “high,” the accessibility score is indeed low, and de facto, many 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 in Alton, 7km away.

5.13 We strongly believe FM/’SM’ should remain in Tier 4 to reflect the TRUE character of the settlement. Moving it up the hierarchy, thus indicating that it is suitable for the siting of considerably more houses in the future just exacerbates the existing accessibility issues and increases car usage. Several inspectors at Appeal, have confirmed this view. They clearly state 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. See Appendix 3

5.14 FM/’SM’ is a Tier 4 settlement based on the Ridge Report. It has limited opportunities for growth in facilities and we believe that there should be a housing pause until such time more facilities/better infrastructure are provided. Population has grown over 38% with no commensurate increase in facilities. We are full!

## Population Change - largest East Hampshire Settlements 2011-2021

Settlement	Tier Number	2011 Population	2021 Population`	% Change
Alton	1	17,816	19,425	9.0
<i>Petersfield</i>	SDNP	14,291	14,996	4.9
Whitehill & Bordon	2	Unsure of accurate data	17,600	
Horndean	2	12,942	13,487	4.0
Liphook	2	6,113	7,129	16.6
Clanfield	3	4,637	6,015	29.7
<b>Four Marks</b>	<b>3</b>	<b>4,067</b>	<b>5,617</b>	<b>38.1</b>

From citypopulation.de which is based on UK Census data

### 6.0 Four Marks/'South Medstead' is Not Sustainable

- 6.1 Four Marks and South Medstead is not sustainable in terms of accessibility to local facilities for many residents by walking and cycling. The topography of the place (uphill by 30m) from Lymington Bottom Road to the shops on A31 and the older demographic should also be considered.
- 6.2 Public transport is limited i.e. the 64 bus goes from Winchester to Alton. However, this doesn't integrate with the early train service at Alton station, 7 km away and is expensive (once the current subsidies are removed). There is no bus service going north or south.
- 6.3 The Ridge report cited above, looks at the accessibility to facilities and services and states that "*10 mins is generally the threshold time-period that people are willing to walk to access key destinations*" and that, "*There is evidence that people walk less in rural areas, rather than having willingness to walk further.*" A 10-minute walk equates approximately to 800metres.
- 6.4 The fact FM/'SM' score is low on this scale, shows that it has poor accessibility and thus cannot be considered sustainable.
- 6.5 Many residents who live in the village, commute out to their places of employment and this is particularly true of many of the "new" residents that have moved here over the recent past as a result of the high level of house building.

- 6.6 Travel survey after survey (including SMASH's own survey, n=705)) have shown that residents primarily use their car to access facilities either at Oak Green or indeed at Alton, Basingstoke or Winchester for weekly shops or other specialist shopping.
- 6.7 From an environmental perspective FM/'SM' lies in the valley of the River Lym. Lymington Bottom Road and Lymington Bottom regularly flood, a situation that will only worsen with climate change.
- 6.8 Building more houses in this area would block the natural pathways for surface water run-off and exacerbate the current flooding problems (remember what happened at Farringdon when local concerns were ignored). The geology of this area is a clay cap over a chalk base which is poor at infiltrating surface water and therefore has constraints to compatibility with use of usually recommended SuDS in some areas (see green coloured area in drawing P8 in Appendix 1). However, the Environment Agency is loath to recommend the alternative methods of deep boreholes to sensitive aquifers that may speed up transportation of contamination from the surface to protected zones of drinking water or the catchment of the nutrient sensitive chalk River Itchen, instead of the contaminated water being gradually filtered through the chalk. These types of catchments are found in both Medstead and Four Marks, where drainage installation therefore of neither SuDs nor deep boreholes are appropriate for different reasons. See photos in the photo gallery, Appendix 1
- 6.9 FM/'SM' as a settlement that has excessive house building over recent years, where any more significant building will most likely increase the risk of significant further flooding and render certain properties uninsurable.
- 6.10 We believe that Four Marks and Medstead are not sustainable villages.

## 7.0 Settlement Policy Boundary (SPB)

- 7.1 We do not agree with the proposed extension of the SPB along Hussell Lane, Wield Road, and Five Ash Road, Medstead (see Interim Settlement Policy Boundary Review Background Paper January 2024). We feel that this encourages inappropriate "backland" development which we have seen in Medstead to the detriment of the village's character.
- 7.2 Policy DM17 covers this possibility which allows for backland development in certain circumstances, however, we feel the policy is not robust enough when

this type of development is *inappropriate* e.g. backland development on an otherwise linear configuration.

- 7.3 With regards to Five Ash Road in particular, the surrounding areas to the north, west and south from these dwellings are all agricultural fields and thus we disagree with your assessment “*Properties along Five Ash Road are physically and visually attached to the existing urban area.*”
- 7.4 Additionally, allowing this SPB expansion encourages development of the land directly behind these houses. In 2019, this area was considered as a potential large development site. Developers still have options on this land. By proposing to extend the SPB here then we believe that this could be a precursor for a developer to exploit the land for a future large site.
- 7.5 Therefore, to minimise the risk of this happening we request that the SPB extension at Five Ash Road is removed.
- 7.6 In general, land “adjacent” to SPB’s is much more vulnerable to speculative applications and development ‘creep,’ which we have seen in Medstead, leading to unplanned, inappropriate development at densities that are not in keeping with the surrounding properties.
- 7.7 Conversely, we are 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 separating them from the “countryside” outside of it. This helps prevent coalescence.
- 7.8 Within Tiers 3,4 and 5, it is again necessary to reflect boundaries and proposed allocations. However, beyond this and perhaps some minor adjustments, we see 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 SPB’s e.g. Upper Froyle. We believe that this will only encourage ‘backland’ development which can very easily destroy the character of those settlements affected.
- 7.9 Furthermore, we are concerned that there are too many examples of where the proposed SPB’s do not adhere to Principle 1 of the Interim Settlement Policy Boundary Review Background Paper 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.”
- 7.10 As this is an ‘Interim’ paper, we would recommend that the details of the SPBs are *taken out of this plan* and agreed with the local Parish Councils who have

local knowledge before they are finalised. This will ensure that there is no future misunderstanding as to exactly where the SPBs are.

## 8.0 Spatial Strategy – Neatham Manor Farm - a large strategic site

- 8.1 The LPA's strategy for future housing development is to locate the majority of it in the larger and more sustainable settlements. This strategy is welcomed (S1.4). This means focusing on settlements in Tier 1 and 2.
- 8.2 The LPA has proposed the siting of one large strategic site at Neatham Manor Farm. This site is adjacent to Alton (Tier 1) and proposes up to 1,000 dwellings.
- 8.3 Although we lament the loss of green fields at this location, it does benefit from having direct road access onto the A31 and retail and employment sites on Mill Lane which can be accessed by walking/cycling over a pedestrian bridge. Additionally, the wider facilities of the town, including the railway station are within 2km, a short cycle or drive away, minimising CO2 emissions as much as possible. Furthermore, it would also cause the least disruption to Altonians during the build phase and provide much needed affordable housing and other facilities to that end of town.
- 8.4 Unless the required overall housing numbers can be reduced, then this quantity of houses (1000) will have to be built on green fields somewhere in the District (as brownfield sites in EH are limited).
- 8.5 Therefore, we believe that this allocation represents the best option, (where none of the options for large sites are particularly desirable in this predominantly rural district) to meet the housing needs across the District and avoiding the 'force fitting' of allocations in areas where they are more unsuitable, unsustainable and where they change the character of the villages where they are proposed.

## 9.0 Site Allocations in Four Marks and Medstead – Pros and Cons



9.1 Four Marks and Medstead have been allocated 210 houses. 2 housing sites and 1 traveller site in Four Marks and 2 housing sites in Medstead.

9.2 **Land West of Longbourn Way. Medstead 90 Houses MED-022 Ridge Score 8 Current planning application -58788/002**

9.3 The PROS for this site are:

- there are limited views of the site from the direct surroundings,
- it is within acceptable walking distance of some local facilities, e.g. GP, café, greengrocers,
- it provides additional houses including “affordable” ones.

9.4 The CONS for this site are:

- it is essentially a large cul-de-sac on another large 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). Current discussions regarding improvements to the road are ongoing with Hampshire Highways Authority to make this location a safe walking/cycling route for the 450+ residents who will be using it,
- it is at an excessive distance to the shops at Oak Green Parade on the A31, which is further exacerbated by some 30m gradient change, making it difficult to traverse and challenging for cyclists and pedestrians, particularly our older residents,
- loss of Grade 3 agricultural land which is obviously a finite resource,
- the increase in traffic will cause negative impact at Lymington Bottom Road/A31 junction and the single lane road under the railway bridge,
- archaeological considerations need to be considered. An extract from the County Archaeologist for planning application 58788/001 i.e. this site, stated, *“The site clearly has an archaeological potential for neolithic remains, which could represent archaeologically significant features and material”*,
- part of the site falls within the River Itchen Catchment; therefore, issues around nutrient neutrality will need to be addressed. The EH Map of Infiltration SUDS suitability for surface water, shows, *“Very significant constraints are indicated,”* 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. See Appendix 1 photo gallery, 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.

9.5 **MSD1 Land behind Junipers, Medstead Village 15 houses Ridge Score 14.4**

- This site is located in the middle of Medstead Village behind ‘Junipers’
- 9.6 The PROS for this site are:
- It is close to village facilities pub, church, school, post office and village hall, play area,
  - it provides additional housing including some “affordable” ones.
- 9.7 The CONs for this site are:
- there are very little employment here therefore new residents will commute to their places of work by car,
  - there is surface water flooding at Green Stile and the High street/Wield Road junction,
  - extra cars will add to the congestion on the High Street (because of parked cars), particularly at peak times.
- 9.8 **FMS4 Land South of Winchester road, Four Marks, 100 houses. Ridge score 11.4**
- 9.9 The PROS for this site include:
- potentially having direct road access onto the A31,
  - a cycle way extension to link this site to Oak Green shops and the recreation ground,
  - link to other existing public rights of ways,
  - provides additional housing including some “affordable” ones.
- 9.10 The CONS for this site include:
- surface water flooding as illustrated by the Environment Agency’s flood map see Appendix 1 photo P7, (it is noted that there is some surface water flooding on this site currently),
  - it is quite a long way from the shops at Oak Green (more than a 10-minute walk)
  - part of the site falls within the River Itchen Catchment, therefore, issues regarding nutrient neutrality will need to be addressed.
  - location of exit just after dual turns into single carriageway and just after the top of a hill is dangerous without traffic lights when turning right and there is no nearby pedestrian crossing.
- 9.11 **FMS 2 Land Rear of 97 to 103 Blackberry Lane, Four Marks, 20 houses Ridge score 8.4**
- 9.12 The PROS for this site include:
- 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,
  - it is located closer than some other sites to Oak Green and Lymington Barns,

- it provides additional housing including some “affordable” ones.

9.13 The CONS for this site include:

- some surface water flooding could cause additional run off onto Lymington Bottom.
- the status of the aquifer as an ‘SPZ 2 area’ limits possible drainage solutions,
- distance to Oak Green without extra infrastructure,
- the additional traffic will add further pressure on Lymington Bottom junction/A31 junction,
- with no 5YHLS this site could increase speculative development on adjacent land in the immediate vicinity being granted permission, due to the ability for cycle and pedestrian access between sites.

9.14 **FMS3 Boundaries Surgery, Four Marks, Extension to surgery. Ridge score 21.4**

9.15 The PROS for this site include:

- it is in the centre of the settlement and is much welcomed due to the significant increase in residents over recent years (1,550 since 2011),
- there is a bus route with a nearby bus stop.

9.16 The CONS for this site include:

- the site has minimal parking, which already causes congestion in its car parking area.

10.0 Surface water flooding in the two villages

10.1 Surface water flooding is an increasing problem due to climate change and the executive agency, the National Infrastructure Commission (NIC), issued a report at the end of 2022 ‘Reducing the risk of surface water flooding’. We believe that the document should be used as a source of reference in the local plan, especially when it is updated at the end of 2024 and that the EHDC local plan document ‘Strategic Flood Risk Assessment (SFRA) Level 2 – Exception Tests, November 2023’ be updated as a result and its recommendations acted upon, where required.

10.2 It is noticeable in the villages of Medstead and Four Marks, that there have been recent increases in both the quantity of water and regularity of flooding in the areas that flooded in previous years - new areas, which have not previously flooded, are now doing so. The villages have many areas with steep topography that direct rainfall towards valleys, both from green fields and in even greater quantities where there is tarmac and other hardstanding. The presence of chalk aquifers covered in clay contributes to these adverse

conditions due to high groundwater levels and the impermeability of the ground to rainfall where there is thick clay. A drawing showing the areas that are unsuitable for sustainable drainage systems (SuDS) is included in Appendix 1 Photo P8

- 10.3 2022 was a very dry year, whilst a drought mid-summer in 2023 has been followed by vast amounts of rain and flash floods. These create perfect conditions for exacerbating the problems of areas already at high potential risk of natural ground subsidence and high risk of flooding, as included in a Groundsure report commissioned by SMASH at the end of 2022, which also reported that satellite monitoring had identified some areas of Soldridge as having ‘recent accelerated changes in ground movement’. (reference Groundsure Georisk report, 2022). Potential risks of instability to existing properties due to many old chalk and gravel mines in the area were noted, as well as the existence of multiple sinkholes in Medstead.
  
- 10.4 Given that in the independent Ridge Report, commissioned by EHDC, concluded that the planning entity Four Marks and ‘South Medstead’ should be classed as Tier 4 (not 3) largely due to issues with accessibility - it should also be of great concern that on at least three occasions in the last two months, i.e. in 2024 thus far, three of the four access roads off the A31 main road into Medstead were flooded, to varying degrees and examples are shown, in Appendix 1 Photo Gallery. The only road that does not flood, Gravel Lane, is a single lane, badly maintained road with potholes, on the junction between it and the A31 - and even this road leads to a part of Grosvenor Road that floods, albeit not as regularly as at its junction with the A31. This causes chaos and safety issues in the area during commuting and school run times whenever it rains heavily. A drawing showing the areas at medium and high risk of flooding is shown in Appendix 1 photo P7.
  
- 11.0 Maintaining the character of our villages is paramount. The plan should place more emphasis on this.
  - 11.1 Landscape Character, Four Marks & ‘South Medstead’ falls within Landscape Character Area 2b the Four Marks Clay Plateau 25 the study area.
  
  - 11.2 The Landscape Character Assessment describes the landscape as “dominated by pasture but also with some arable fields, reflecting variations in soil type and including considerable areas of pasture managed by horse grazing.” It also states: “Tree cover creates a secluded and enclosed landscape contrasting with the openness of the arable fields.” The rising ground through the area of interest and beyond northwards offers views down to development on the lower levels. Examples of this can be seen on Stoney Lane, the bridleway that runs along a track from the railway station through fields to join Five Ash Road. In places, these lower developments offer views up to an open or treed skyline, but in many cases recent development has

blocked these. As the development spreads outwards from the village centre it is becoming visible from open countryside.

- 11.3 In the southern part of Medstead the buildings generally form a linear settlement along the three principal roads. Ribbon development along the three roads that bound the area of interest has been augmented in recent years with backland and infill development. Recently large developments on greenfield land represent a significant expansion of the settlement north of the railway line.
- 11.4 The dwelling density across the area of interest varies greatly, but averages at around 11dpha. The density of the new developments tends to be double that.
- 11.5 Most of the earlier houses on the principal roads are set back within their plots and face the road. Some of the recent developments include low-rise blocks of flats of up to two and a half storeys. Much of the new development takes the form of detached or semi-detached houses.
- 11.6 Generally new development is two or two and a half storeys. Where situated on rising ground this can dominate views, especially where it is 'perched' on the hillside rather than being set into it.
- 11.7 Unlike a traditional village layout, these detached houses tend to be very close together and the breaks in the building line and lack of space for planting combine to result in a broken up and visually 'bitty' streetscape.
- 11.8 The houses on the principal roads are generally set back from the lane and screened by vegetation along the frontage. Most of the earlier properties have relatively narrow driveway entrances, which restrict views into the plots.
- 11.9 Green Infrastructure and Environmental Designations, narrow belts of woodland, individual trees and hedgerows greatly help to break up what is becoming a relatively large settlement. Of particular importance is the vegetation, which forms a backdrop to development, particularly where buildings would otherwise dominate the skyline. Most of this green infrastructure is largely in the private domain and unprotected.
- 11.10 Included in that vegetation is the combination of hedge and shrub planting that form plot frontages along the roads, lanes, and access ways. Large trees on all three main roads bounding the area of interest contribute greatly to their semi-rural character.

11.11 Several of the recent housing developments have retained and incorporated existing mature trees in their layouts, which contribute greatly to the setting of the buildings. However, there is no evidence that new planting is being undertaken to provide significant structure planting within these new developments either within garden plots or in the public areas. Where tree planting has been included in the developments it is generally insubstantial, a few single trees of smaller species in tight spaces which will not allow future growth. The overwhelming impression is of hard suburban-urban. There are some individual and group TPOs within the area of interest but they by no means cover all important vegetation most of which is essentially unprotected.

11.12 Trends show significant expansion of the settlement with new housing giving rise to:

- Loss of rural setting/ agricultural land with consequent increase in visual density (no green gaps),
- Main A31 is a significant barrier to movement between Northern Four Marks and local services,
- New development impacting views from high ground to the north.

Further a Sensitivity study shows:

- Loss of skyline views at edge of settlement,
- Loss of open space/greenspace and landscape setting within settlement, especially along routes out to countryside,
- Potential incursion of suburban development into countryside to the north,
- Long views to new development from high ground to the north.

11.13 The summary above from the '2018 Landscape Character Assessment' paints quite a bleak picture of where this area of Medstead is going, being on the tipping point of urbanisation through the backdoor. Uncontrolled, speculative development and a piece meal planning vision are all currently contributing to this unwelcome change.

11.14 We are not yet at complete destruction of our village. We believe that with the right vision, design code and foresight the southern part of Medstead could be saved.

11.15 We believe that the EHDC policies should uphold the guidance of the NPPF paragraphs 131 to 141. Of particular note are the following points:

**Paragraph 132.** Design policies should be developed with local communities, so they reflect local aspirations, and are grounded in an understanding and evaluation of each area's defining characteristics. Neighbourhood planning

groups can play an important role in identifying the special qualities of each area and explaining how this should be reflected in development, both through their own plans and by engaging in the production of design policy, guidance and codes by local planning authorities and developers.

**Paragraph 133.** To provide maximum clarity about design expectations at an early stage, all local planning authorities should prepare design guides or codes consistent with the principles set out in the National Design Guide and National Model Design Code, and which reflect local character and design preferences.

**Paragraph 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. 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.

**Paragraph 135.** Planning policies and decisions should ensure that developments:

- (a) will function well and add to the overall quality of the area,
- (b) are visually attractive as a result of good architecture, layout, and appropriate and effective landscaping.
- (c) are sympathetic to **local character** and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change
- (d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming, and distinctive places to live, work and visit.
- (e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks

**Paragraph 136.** Trees make an important contribution to the character and quality of urban environments and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets are tree-lined, that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly planted trees, and that existing trees are retained wherever possible.

**Paragraph 139.** Development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design.

12.0 We now review specific policies and make relevant comments.

12.1 **04 RESPONDING TO THE CLIMATE EMERGENCY**

We welcome and support EHDC’s policies and proposals to mitigate the detrimental effects of Climate Change. The use of an approved Design Code would strengthen these policies and help with its control and enforcement. As transport is the main contributor to greenhouse emissions then we would suggest that a comprehensive sustainable transport plan/system be put in place to help deliver on the policy aims. Furthermore, it is important to not locate significant numbers of houses in locations a long way from good facilities, otherwise new residents will simply use their vehicles to access them. We feel that the strategy for locating the vast amount of housing in the Tier 1 and 2 settlements is correct to help minimise vehicle emissions.

Note your “Climate Emergency Banner” which states, “reducing the effects of climate change and achieving carbon zero developments are top priorities for the Council” but fails to mention that the biggest source of CO2 emissions comes from transport – 43.49% here.

12.2 **05 SAFEGUARDING OUR NATURAL AND BUILT ENVIRONMENT**

We applaud the fact that that EHDC are trying to protect our localities and prioritising the health and well-being of communities in delivering what’s needed to support new development. We approve and support the following Policies:

**Policy NBE1: Development in the Countryside .**

We support this Policy as it defines what development will be allowed in the countryside and appears to be stronger than the existing Policy CP19.

**Policy NBE2: Biodiversity, Geodiversity and Nature Conservation.**

We believe that the clauses in Policy NBE2 should be made stronger and made SMART by using a quantitative measurement method, which we would prefer.

**Policy NBE3: Biodiversity Net Gain .**

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

**Policy NBE7: Managing Flood Risk** see also section 10 above.

We believe a clause (f) should be added to specifically include Surface water runoff, particularly as we are aware that the Flood Risk map Figure 5.2, page 113 in the draft local plan shows ground water/river flood risk and not the occurrences of surface water flooding. We are aware that there is an East



Hampshire level 1 SFRA map ‘Environment Agency ‘Risk of Flooding from Surface Water’ that exists in your system and we believe that it should also be included in the local plan. A extract of this map is included in this document’s Appendix 1, P7, showing parts of South Medstead and Four Marks that are affected by medium and high flooding due to surface water. We are concerned that additional housing on yet more green fields in FM/’SM’ will only exacerbate the surface water flooding that we already regularly see in these two villages. We have seen incidents of extensive surface water flooding 3 times in the last 2 months on several village roads, which have been impassable by both pedestrians and vehicles.

- **See Appendix 1 P 2 Lymington Bottom Road**, Medstead 5 January 2024 – both road and pathway flooded which limits access to the houses on the left of the picture see Photo gallery P2
- **See Appendix 1 P 3 Lymington Bottom Road**, Medstead 9 February 2024 – both road and pathway flooded Photo gallery P3
- **See Appendix 1 P 4 Lymington Bottom Road**, Medstead 26 February 2024 – both road and pathway flooded Photo gallery P4
- **See Appendix 1 P 5 Grosvenor Road**, Medstead – Flooding Photo gallery P5
- **See Appendix 1 P 6 Boyneswood Road**, Medstead - road and pathway both flooded Photo gallery P6
- **See Appendix 1 P 7** in the Photo gallery shows the EA Map of Flood risk. This illustrates that this is particularly an issue in the southern part of Medstead. Photos 1-6 show the floods in graphic detail. They mirror where the floods were predicted on the map.
- **See Appendix 1 P 8**, See extract of EHDC level 1 SFRA BGS Infiltration SuDS Suitability map. The green area shows areas of ‘very significant constraints to infiltration SuDS’ making drainage solutions problematic in these areas (boreholes are not advised instead either, as surface contamination is transported too quickly to the aquifer, instead of being gradually filtered - is particularly problematic if the catchment area is in the nutrient sensitive River Itchen, such as in parts of ‘Land West of Lymington Bottom Road and Land South of Winchester Road ).

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

We support Policy NBE8 Maintaining water quality. EHDC have allocated as an employment site ALT3 – Land adjacent to Alton Sewage Treatment Works, Alton. We are 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.

This DLP appraisal does not appear take into account the increased needs of this site should any speculative development planning applications be granted for when the LPA does not have a 5-Year Housing Land Supply, call it foresight or contingency capacity.

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

We remind EHDC the area of the impact includes two of the EHDC allocated sites: FMS 1 Land West of Lymington Barns and FMS4 Land South of Winchester Road. As they are on the Wey Itchen watershed, they will drain some of the site into the Itchen basin. Nutrient neutrality is a considerable concern in both these locations.



Figure 1: Itchen Catchment Boundary

### **Policy NBE11: Gaps Between Settlements**

We commend 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. We recommend the wording is expanded to include any gaps defined in Neighbourhood Development Plans.

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

We support the provision of ‘a new strategic semi-natural greenspace in the northwest of the District’ as seen in the EHDC’s specific project plan and look forward to hearing and seeing more about this initiative.

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

We support this policy to protect aquifers. We ask that this clause be used when judging Planning Applications when deliberating on SuDS drainage schemes, to be especially considered when the use of boreholes is considered in areas where aquifers, either primary or secondary, are close to the site. We would also recommend the protection of dark skies in rural areas is included in this policy.

### **Policy NBE14: Historic Environment**

We are 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).

Additionally, when the archaeological consultant reviewed the original planning application for FMS 1 Land West of Lymington Barns, he stated, *”Neolithic remains have been found adjacent to the east of the site and comprise a pit with a chisel arrowhead and Peterborough Ware pottery. Further remains may extend into the area of proposed development. Should this be the case, the site has the potential to contribute towards the Solent Thames research framework for the Neolithic and Bronze Age, specifically*

*research agenda 8.2.7: Chronology which is concerned with dating residues on ceramics particular focus on Peterborough Ware; and agenda 8.4: Settlement which focuses on identifying and characterising Neolithic and Bronze Age settlement sites. The site clearly has an archaeological potential for neolithic remains, which could represent archaeologically significant features and material.”*

### 12.3 **06 CREATING DESIRABLE PLACES**

We acknowledge that these policies link to NPPF paragraph 134 and links to the National Model Design Code (NMDC) and directs LPAs to use it when judging Planning Applications in authorities that do not have their own Design Code. We are disappointed that there is no clarity given in the DLP about the production of a Design Code for the District in terms of either content or timing.

We 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.

We approve and support the following policies:

#### **Policy DES3 Residential Density and Local Character**

We believe 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 the surrounding local area.

We note that the Housing Density on a new site is proposed to be within the range of existing residential densities local to the development site but ask who would be responsible for determining this information and suggest that it is the responsibility of the LPA to ensure consistency. We agree that the layout should be similar to those adjoining neighbourhoods, 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 and sensitive to the overall village area.

Where development is proposed on green fields at the edge of settlements then the dwellings should respect their position, e.g. single storey bungalows and with green edge buffers.

We agree that housing density must meet the criteria to allow streets to be wide enough to provide green infrastructure and allowing sufficient space for future growth of these trees.

Additionally, we believe that where smaller properties are proposed according to local need, then this should not adversely impact the housing density of the proposal site as this can have a significant adverse effect on the character of the area, particularly in villages, where traditionally the number of dwellings per hectare is relatively low.

**12.4 07 ENABLING COMMUNITIES TO LIVE WELL**

We welcome the acknowledgement by EHDC that the planning process can improve its residents' 'Well-being' by approving planning applications that create sustainable developments. We support these policies.

**12.5 08 DELIVERING GREEN CONNECTIONS**

We support the ambition expressed in the Delivering Green Connections to protect the Community Facilities within the District – which includes those facilities/infrastructure controlled by EHDC and HCC. In Medstead although 300 houses on 4 different housing developments have been built there has been no real significant open space included in the development apart from LEAP's and a few allotments. The policies going forward need to proactively create spaces that can be used practically and preserved for future generations.

**12.6 09 HOMES FOR ALL**

We support the Core Objective A, particularly the emphasis given to helping to deal with the issues of affordability and the challenges of an ever-increasing ageing population, however we feel the policies don't go far enough.

The use of the 'Standard Method' to calculate the number of houses required in the District distorts the quantum and in fact just exacerbates the situation. The affordability ratio used in the calculation adds a further 3857 houses to the local projected household growth which largely promotes inward migration to an area. It is thought that an advantage of building more houses brings down house prices, but this in reality is just a myth. See Affordable Housing section below.

The current Draft Local Plan for Basingstoke and Dean, which is also currently in consultation agrees with this view. They state, "*4.5 The council does not support the government's top-down approach to setting housing requirements which is based upon a one-size-fits-all formula that fails to take into account the unique characteristics of the borough, its history or future needs, the views of local residents, or its specific and notable constraints. More specifically, it*

*does not take into account the impacts of extremely high levels of housing growth in the past and the pressure that this has put on the borough's infrastructure and services. The simplistic nature of the Standard Method directs more growth to locations that have grown in the past, thereby exacerbating these issues. It is therefore considered to be fundamentally flawed and unsuitable to be used as a basis for plan making."*

We would make the additional comments on the following Policies

**Policy H1: Housing Strategy**

We support the Spatial Strategy as outlined in the document. However, we are concerned about the additional buffer of 643 extra homes that has been built into the Plan. We believe that the buffer is not necessary as the Plan already provides for a number of houses that is 54% more than the local projected household growth – a potential over-provision of 3,857 homes.

**Policy H2: Housing Mix and Type**

Table 6.10 shows that the majority of the growth in population over the plan period will come from the 65+ age group.

**Housing mix needs to reflect this.**

We support the statement in Policy 2.1 which highlights the need for: a. smaller homes, b. requirements of an ageing population and people wishing to downsize, including the provision of single storey dwellings. However, we believe that the DLP significantly understates the scale of the challenge that the district faces, and more provision should be made for single storey dwellings, care homes and care assisted accommodation.

These demographic trends would benefit from more robust policies for the type of housing to be built. Villages like FM/'SM' already have an oversupply of 4 and 4+ bedroom homes. When setting out the types of houses to be built we believe that EHDC should robustly enforce site configurations in accordance with actual need as set out in the HEDNA (2022), see table below. In the past developers have consistently proposed more 4 and 4+ bedroomed houses than are needed. However, these suggested percentages (where 2 and 3-bedroom houses should be the majority) should not adversely impact the housing density of the proposal site as this can have a significant adverse effect on the character of the area, particularly in villages, where traditionally the number of dwellings per hectare is relatively low.

**Table 13.5 Need for Different Sizes of Homes**

	1 Bed	2-Beds	3-Beds	4+ Beds
Market	10-15%	40-45%	30-35%	10-15%
Affordable Ownership	20-25%	40-45%	25-30%	5-10%
Affordable Rented	35-40%	35-40%	15-20%	5-10%

Source: Derived from a range of sources

65 and over	29,836	40,751	10,914	36.6%
Total	122,628	129,624	6,996	5.7%

Source: ONS

### **Policy H3: Affordable Housing**

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, a) Market houses at or below the median house price for the District, b) Houses for those whose needs are not met by the market.

In East Hampshire there is clearly an affordability crisis because according to the HEDNA 2022, the median house price is £415,000 whereas the median income salary is £28,603. This gives an affordability ratio of 12.7. Therefore, buyers need 12.7 times their salary in order to buy a house at the median price. Since mortgage lenders typically only lend at the rate of 4-5 times salary then this makes the median house price in EH unaffordable for many first-time buyers. However, it was argued that by including the affordability ratio in the standard method calculation then more houses would be built over and above the projected household growth for the District, which would result in a reduction of house prices. This premise simply doesn't work to any significant extent as explained below.

Feedback from the "Issues and Priorities" consultation in 2023, particularly from Petersfield Climate Action Network (PeCAN) and FM&M, Neighbourhood Plan Steering Group (NPSG), both used published data to question the effectiveness of the affordability ratio mechanism, (which currently amounts to 203 pa) over and above the projected household growth, (currently 375 pa), i.e. to over-build by 203 units a year in the hope that this will lower house prices in East Hampshire. The construction of 203 surplus homes would increase the housing stock in East Hants by a little under 0.5%. The OBR estimates that each 1% increase in housing stock reduces house prices by around the same percentage (Working Paper No. 6, July 2014, chart 3.2).

Assuming this also applies in East Hampshire, then reducing local house prices by less than 0.5% a year will not be any help for first time buyers who face an extremely high affordability ratio of 12.7 x earnings (up from 5x in the 1990s). Furthermore, according to the census data, over the last 10 years, the number of households in East Hampshire grew by over 11%.

During this time, the number of households in Four Marks/'South Medstead' grew by over 25%, (due to over 550 new dwellings being built here). In neither village is there any evidence that this significant increase in new properties led to a reduction in house prices. Indeed, the data suggest the opposite. In the same period, house prices in the GU34 area, (which includes FM&M) have gone up by over 30%.

Building additional houses over and above the projected household growth, just brings in more people from outside the area as so many of the properties are expensive 4-bedroom executive houses (even though the average number of people per household has been falling from 2.45 in 2011 to 2.39 in 2021), so once again they are outside the reach of many local residents. Furthermore,

these new residents commute out for work thus increasing the amount of greenhouse gas emissions contrary to EHDC Climate Emergency response.

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'. The HEDNA (2022) indicates 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 to be built should be affordable.

With the scale of this challenge, the priority must be to address through policies that direct the industry to build market houses at or below the median house price for the District. However, we appreciate that this probably isn't feasible at the current time.

**Policy H4: Rural Exception Sites.**

We support this policy subject to the following comments, we recommend that with regard to point a), in order to support local democracy, the Parish Council should agree the local need as well as the LPA. With regard to point i), any provision of market housing should be at a price below the median house price for the District.

**12.7 10 SUPPORTING THE LOCAL ECONOMY**

We are 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 Fig 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. To address the Climate Change Emergency a clear policy should be put in place to enable all those migrating into the District to be able to find employment within the District. We recommend that policies are included within the Plan that seek further sites for employment that are located close to efficient public transport services.

**12.8 11 DEVELOPMENT MANAGEMENT POLICIES**

We believe that in many of the "DM" policies, the wording is more aspirational than prescriptive and thus open to interpretation and legal challenge. The wording should be strengthened to prevent this legal ambiguity as per the Cherkley Judgement 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. We support these policies overall but would make the following comments.

**Policy DM1 The Local ecological network**

There needs to be precise methodology in the policy for quantifying the scales of 'harm and benefit' rather than being left subjective only to be decided upon later by legal debate.

**Policy DM7 Archaeology and ancient monuments**

We support the Policy particularly because of the Tumilli 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 Archaeology Service, EHDC or a National body? We would hope that this Policy is sufficient to afford protection in the case of an unknown archaeological site uncovered by excavation prior to housing, etc. We realize that a reputable developer would stop work, until archaeological 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 have Archaeological Officer review and authorize every planning application as Statutory Consultee. The definition of archaeological must 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 DM12 Air Quality**

We welcome the Policy DM13, especially as Four Marks/'South Medstead' is transversed by the A31, which because of the significant levels of traffic, imposes poor air quality on residents living adjacent to the road and those pedestrians walking along the road. The number of dwellings to trigger an Air Quality Assessment must be defined in the Policy and define the catchment area to be considered.

**Policy DM17 Backland Development**

We would support a stronger Policy which deals more robustly with circumstances where 'backland' development is inappropriate, as it can create a massive change to the local character e.g. from say a linear development along a road to 'out of place' cul de sac developments behind. The SPBs agreed with NP groups and EHDC must be carefully drawn to minimize the risk of inappropriate backland development sites throughout the local plan period.



## 13.0 In summary

- We support the majority of the plan with some reservations.
- Housing numbers as calculated by EHDC are too high, overstated and double counted in places. The buffer of 643 should be removed or reduced.
- The Ridge methodology for assessing Settlement Hierarchy tiers, although not perfect, is quantitative, plausible, and welcome.
- Using this methodology Four Marks/'South Medstead' should be designated Tier 4 not Tier 3. EHDC have not adequately justified this promotion.
- EHDC's Settlement Policy Boundary (SPB) has redrawn boundaries in Medstead, one of which we strongly object to at Five Ash Road.
- Four Marks and Medstead *are not* sustainable locations as stated.
- We support the spatial strategy and the designation of Neatham Down Farm as a strategic sustainable site.
- Site allocations all need major mitigations if they are to be permitted.
- Surface water flooding is of great concern in both villages.
- Character preservation of our villages is paramount. The plan needs to defend more than it does.
- Detailed constructive comments have been made on specific policies in the plan.
- SMASH declare that they have provided evidence to and are in agreement with the Four Marks and Medstead Neighbourhood Planning Steering Group's (NPSG) Local Plan submission.

Thank you for giving us the opportunity to submit our thoughts to the draft Local Plan.

We are happy to discuss any aspects of this submission with you at any time.

Yours sincerely

[Redacted signature]

On behalf of The SMASH team and the Medstead & Four Marks community.

[Redacted name]



## APPENDIX 1 PHOTO GALLERY

P 1 Longbourn Way – Flooding



P 2 Lymington Bottom Road 5/01/2024



P3 Lymington Bottom Road 9/02/2024



P4 Lymington Bottom Road 26/02/2024



P5 Lymington Bottom Road,



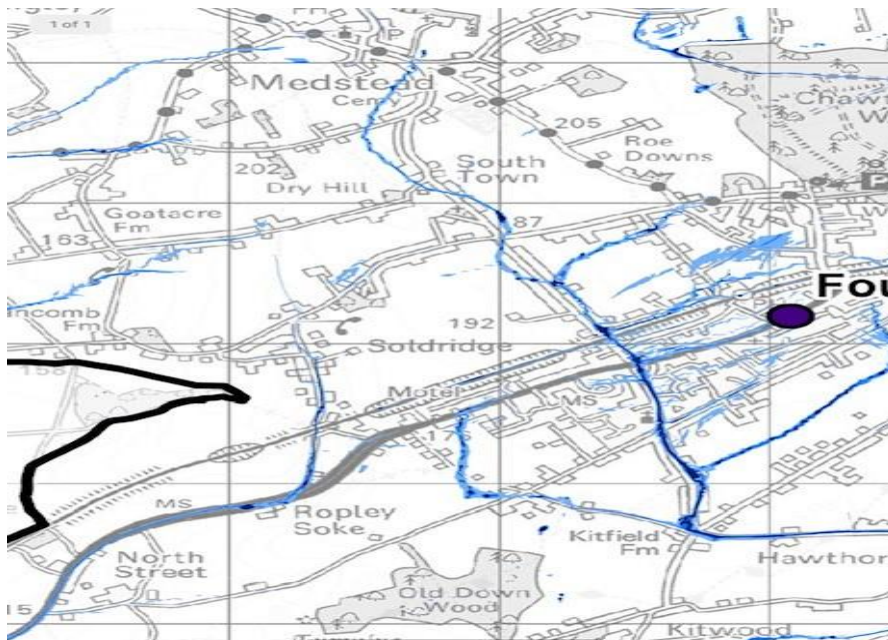
P5 Grosvenor Road, Medstead 2023 and 2024



P6 Boyneswood road, at A31 Junction, Medstead



P7 EA Flood risk map – Photos above mirror the areas shown



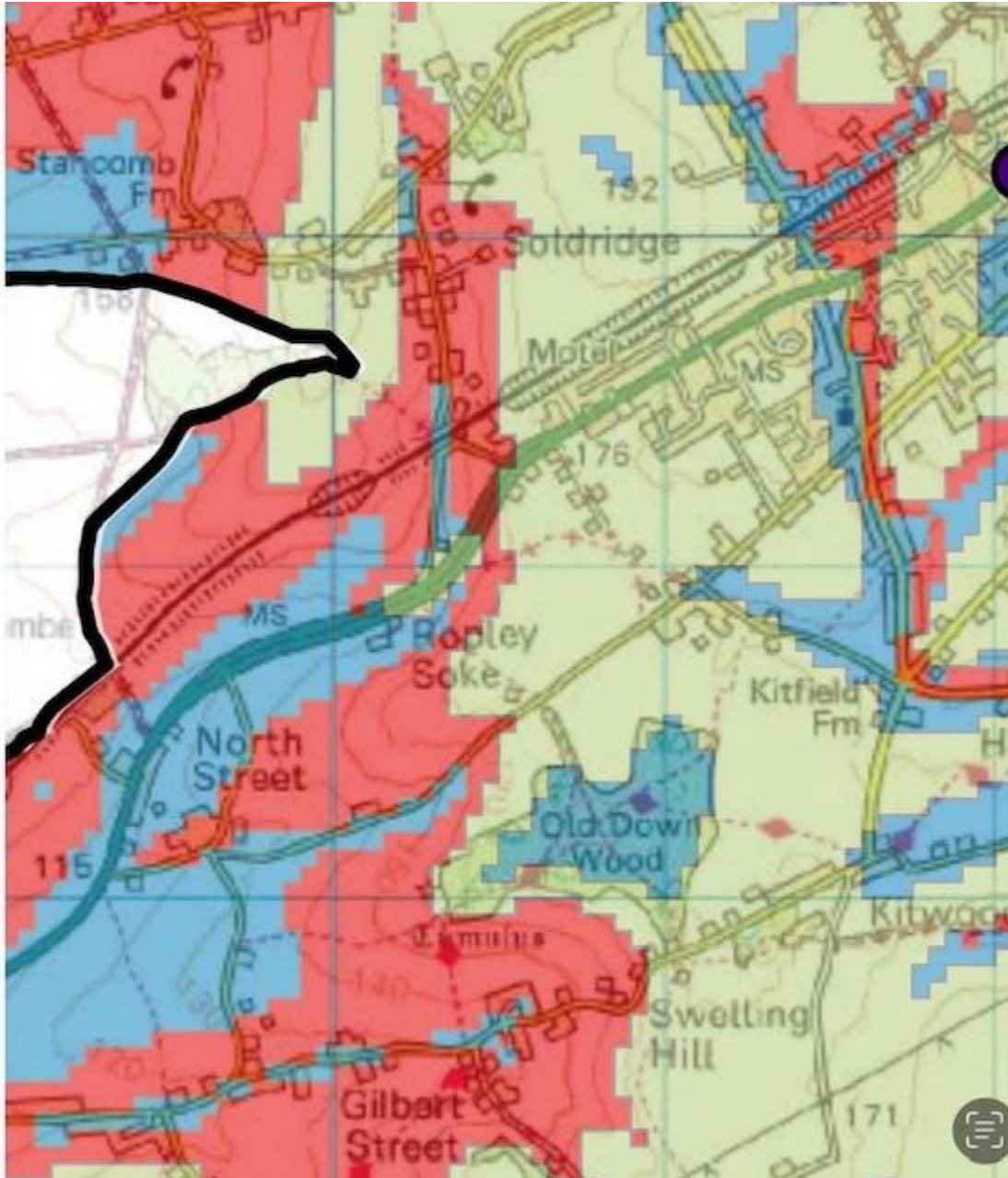
P8 Extract of EHDC level 1 SFRA BGS Infiltration SuDS Suitability map.

Key

Green area 'Very significant constraints are indicated for infiltration SuDS'.

Blue area 'Probably compatible for infiltration SuDS'

Red area 'Highly compatible with infiltration SuDS'



## APPENDIX 2

### Alton Facilities vs Four Marks/'South Medstead' facilities vs Population

Population of Alton 19,400

Population of Four Marks/'South Medstead' 5,600

Alton has 3.46 times the population of Four Marks/'South Medstead'

### Supermarkets

Four Marks/'South Medstead'	Alton
None	Sainsburys
	Waitrose
	Aldi
	Lidl
<b>Total = None</b>	<b>Total = 4</b>

### Convenience Stores

Four Marks/'South Medstead'	Alton
Tesco Metro	Co-op
Co-op	Alton Food & Wine
M&S food (at the garage)	Alton Express
	Londis
	Iceland
<b>Total = 3</b>	<b>Total = 5</b>

### 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
	Vodaphone phone shop
	Charters Estate Agent
	Wellbeing Pharmacy
	WH Smith
	Holland & Barrett
	Westbrook kitchens & bathrooms
	Grovely Pets
	Lovable Rogues barber
	So Lush – smoothies/ice cream
	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
<b>Total = 15 (+1 Pharmacy)</b>	<b>Total = 86 (+3 Pharmacies)</b>

## Pubs

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
<b>Total = NONE</b>	<b>Total = 12</b>

## 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
<b>Total = 2</b>	<b>Total = 16</b>



## 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
<b>Total = 2</b>	<b>Total = 15</b>

## Banks/Building Societies

Four Marks/'South Medstead'	Alton
None	Santander
	TSB
	Newbury
	Nationwide
<b>Total = NONE</b>	<b>Total = 4</b>

**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
<b>Total</b>	<b>223.37</b>	<b>201.96</b>	<b>21.40</b>

Source: Tables 12 and 13, Appendix 2.

Additionally, public transport is limited in Four Marks/’South Medstead’

**Bus Routes**

Four Marks/’South Medstead’	Alton
64 (Alton - Winchester)	<b>64</b> (Alton - Winchester)
	<b>65</b> (Alton - Guildford)
	38 (Alton - Petersfield)
	205 (Alton – Tisted – Farringdon’s)
	206 (Alton – Upper Froyle – Bentley – Binsted)
	208 (Alton – Medstead – Bentworth – Lasham)
	<b>13</b> (Basingstoke – Alton – Bordon)

Bold shows those routes with at least an hourly service.

**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, we 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 we consider that Alton has a good level of facilities (as shown above), then if we divide the total number of each facility in Alton 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 (as a number)	Theoretical Shortfall in facilities in FM/SM (as a %)
Comparison Stores	89	16	26	<b>10</b>	<b>38%</b>
Café/restaurants	16	2	5	<b>3</b>	<b>60%</b>
Takeaways	15	2	4	<b>2</b>	<b>50%</b>
Pubs	12	0	3	<b>3</b>	<b>100%</b>
Banks/Building Societies	4	0	1	<b>1</b>	<b>100%</b>

The data for supermarkets and convenience stores has not been included. The reason for this is that we consider that they are both simply “food shops” and the only real difference is their size. Therefore, we think it would be fair to say that you would expect supermarkets to predominantly be located in towns and convenience stores to be in villages.

## **APPENDIX 3**

### **Inspectors reports and or appeal findings**

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, Lymington 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 Exchange<sup>2</sup> (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 Road<sup>3</sup> (the 2015 decision) to be sustainably located, that site is significantly closer to the village centre.

# South and East Liphook Residents' Group

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

10<sup>th</sup> February 2024

Dear Sirs,

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

Thank you for the invitation to take part in the Regulation 18 Public Consultation on your Draft Local Plan (2021-2040). May we start by commending you for the work you have done to bring it to this point.

By way of introduction, the South and East Liphook Residents' Group (SELReG) represents the views of over 220 households to the south and east of Liphook, with particular emphasis on development proposals and associated issues. As such, we strive to support developments that are in the interests of the Parish of Bramshott and Liphook as a whole, while objecting to those that are not.

The SELReG response to this Consultation is presented in two distinct sections. Firstly, we address the Plan as a whole and comment on issues that we feel have been somewhat overlooked in your draft. Then secondly, we look at the sites proposed for development allocation around Liphook, and whether they meet the specific rules for development that the Local Plan's policies set out.

### **1. The Plan as a whole**

The new EHDC Draft Local Plan appears to be much reduced when compared with previous versions. Many existing policies relating directly to the district and its residents have been removed. It therefore comes across as a generic plan focussed purely on development rather than considering the entire local area in which we live and work.

We would suggest that the following issues require further attention:

- a. **Infrastructure Arrangements.** While Policy DGC1 and Appendix H (Infrastructure) set out how new developments must satisfy infrastructure requirements via S106 arrangements, very little is said about improving the infrastructure arrangements that exist presently. We have a lack of GPs and schools (as demonstrated by the Swan Group currently reviewing the facilities they will need to accommodate the anticipated growth in patient numbers), extensive traffic congestion,

rainwater flooding, sewerage overloads, power cuts, potholes and non-existent local buses, to name but a few of the problems that beset us now.

It appears that unless an area is designated for development, there are no plans to improve its existing shortcomings.

This is not a sound approach. The Local Plan should actively identify where new or extended medical facilities should be, just as it should the same for schools. It needs to allocate either new land or existing sites for intensification or expansion simply to meet the growth that has already taken place, and which has not been successfully planned for or provided.

Policy DGC1 and Appendix H are not sound and the whole plan lacks credibility by omitting to identify infrastructure improvements that are critically needed.

- b. **Cross Boundary Duty to Cooperate.** We note the comment to ensure “Cross Boundary Duty to Cooperate” within the appendix but regarding the Parish of Bramshott and Liphook there is no evidence of this or that any cooperation has been forthcoming with the South Downs National Park Authority (SDNPA). Indeed, a wordsearch for “SDNPA” returns only three hits from the whole Draft Local Plan document, and Page 3 para 4.3 confirms that there has been no collaboration with the SDNPA since 2019.

The village of Liphook has no opportunity to grow within the existing settlement boundary and the allocation of housing sites to the south and east of the village are unsustainable. Liphook has ample space to develop and provide the needed new, affordable, open market homes with associated infrastructure, in sustainable locations that will not be car dependant and can access facilities by foot and bicycle - **but they are within the SDNP**. There is no cooperation or any evidence to suggest that the SDNP realises the unique situation that Liphook is in, and we implore EHDC and SDNPA to come up with a cohesive holistic plan for development within the entire parish.

- c. **S106 and CIL payments.** It is noted that every policy appears to make reference to S106 and CIL payments as a mechanism to improve and upgrade local infrastructure and facilities that will be affected by a new development. Historically the Parish of Bramshott and Liphook never appears to receive any of these payments for improvements, they seem to be diverted to other towns and villages. Can EHDC guarantee that any payments received will be sufficient to improve the infrastructure required, are always recovered from developers and are always spent within the parish for which they were intended?
- d. **Liphook Village Centre congestion.** Liphook has a recognised issue with the centre of the village (the Square) being heavily congested and at peak times, daily, at a virtual standstill with traffic. Hampshire County Council have advised that no new roads or improvements will be funded or carried out, but every development proposal promises improvements and measures to alleviate the problem.

These two factors are not mutually compatible therefore no new development should take place which will have an adverse impact on the conservation area of the Square. This should include the construction period, as well as the long-term residency.



- e. **Liphook age profile and housing stock.** It is noted that the Parish of Bramshott and Liphook actually has more 0 – 20-year-olds and less 45+ year old residents than the average in the EHDC area. It also has more flats and maisonettes than bungalows and houses than the average settlement in the EHDC area. This means that any new development proposals should reflect the age and housing demographics with more family houses and bungalows, rather than high density flats.
- f. **The Neighbourhood Development Plan.** Locally, a great deal of time, money and effort has gone into the formation of Neighbourhood Development Plans (NDPs), and yet these are not mentioned in this Draft Local Plan. The Draft Local Plan should properly note and summarise Made Neighbourhood Plans and those that have published a first or second draft. There should be some meaningful engagement in written form with their fact and content. As well as being informative, that engagement also ensures that the NDP plans and policies are not held in isolation with less weight than those in the adopted Local Plan.

Is it to be construed that NDPs are now superseded and redundant?

## **2. Sites in and around Liphook proposed for development.**

- a. **LIP1 – Land North of Haslemere Road, Liphook. LAA Ref: LIP-005 2.5 ha for 24 homes**
  - i. The site is outside the settlement boundary of Liphook so is deemed to be development in the countryside. As such, it is contrary to policy NBE1 “Development in the Countryside”.
  - ii. This site is entirely within the River Wey Conservation Area and it is too large to be able to avoid harm to the setting of the Conservation Area. Building here is contrary to DLP Policies NBE2 (Biodiversity, Geodiversity and Nature Conservation) and NBE3 (Biodiversity Net Gain), which will have legal effect from February 2024 depending on the size of the proposed development. There is no way that any mitigation measures proposed could compensate for the loss of macrofauna diversity in this field (foxes, deer, badgers, horses, egrets, Canada geese and many bird species). Also, the proposal is directly contrary to the stated environmental aims of The River Wey Conservation Area, “which is valued for its largely rural historic landscape”.
  - iii. This proposal is contrary to DLP Policies NBE7 “Managing Flood Risk” and probably NBE8 “Water Quality, Supply and Efficiency”. Building here will lead to increased surface runoff, and hence pollution of the River Wey. Risk of downstream flooding will also be increased. The proposal even highlights “significant constraints for infiltration sustainable drainage systems”. Any water that does infiltrate will immediately move downhill laterally straight into the River Wey, thus not solving the problem.

It should also be noted that the sewerage system in the south and east of Liphook is already at full capacity and frequently unable to cope. Housing here will add to this problem and lead to domestic flooding by sewage and pollution of the River Wey due to inadequate mitigation measures on site and downstream capacity constraints

- iv. As it is very close-by and a very dense proposal, development of this area would be contrary to policy NBE4 “Wealden Heaths European SPA and SAC sites”.
- v. If it is to comply with policy NBE8 “Water Quality, Supply and Efficiency”, any Developers of this site must fund IN ADVANCE construction of associated water and/or wastewater infrastructure. It must be operational before any dwellings are occupied.
- vi. The allocation of the site at a density of 9.6 homes/ha appears to be low density on paper, but because a large section of the site is unsuitable for development, the actual build density on the available land will be much higher. This is contrary to policy DES1 “Well-Designed Places”, policy DES2 “Responding to local Character” and Policy DES3 “Residential Density and Local Character”.
- vii. The Draft Local Plan states that the site scores above average in the Local Planning Authority’s Accessibility Study but on closer inspection it actually scored 4/8, so not above average in the scoring system.
- viii. Due to its distance from facilities (Liphook Station 1.9km, Sainsburys Store 1.4km, Liphook Federation Schools 2.2km) it will be a car led development resulting in increased traffic and congestion at peak times in the Square. Along with a very dangerous exit into Haslemere Road, this all makes it contrary to policy DGC2 “Sustainable Transport”.

**Taking all the above points into consideration, we strongly object to the proposal to include this site for potential development. It is not a sound housing allocation and would be contrary to the National Planning Policy Framework (December 2023).**

**b. LIP2 – Land West of Headley Road, Liphook. LAA Ref: LIP-012 1.6 ha for 20 homes**

- i. The site is outside the settlement boundary of Liphook so is deemed to be development in the countryside. As such it is contrary to policy NBE1 “Development in the Countryside”.
- ii. It is however adjacent to developed land and an existing SANG and is much closer to village facilities. It does only score 4/8 on the Accessibility Study but is very close to Liphook Federation Schools, one of the major generators of traffic congestion within the Square at peak times.
- iii. Overall, the site is a good choice for new housing, but we question why the designated number of homes has been reduced by 50%, originally 40 homes but now only 20, making it the lowest density of all the proposed sites in Liphook.

**Given the points raised above are taken into account, we have no objection to the inclusion of this proposed development site.**

c. **LIP3 – Land at Chiltley Farm, Liphook. LAA Ref: LIP-017 4.5 ha for 67 homes**

**This is not a sound allocation.**

- i. It is noted that within the Draft Local Plan there are confusing references and descriptions of the site with site LIP2. These are thought to be typographical errors.
- ii. The site is an existing Poultry Farm that successfully produces 2.5 million chicks per year from around 18,000 broiler chickens. This is a much-needed agricultural business producing home grown food, and as such development of it would be in contrary to policy NBE13 “Protection of Natural Resources (Agricultural Land)”.
- iii. On page 411 the Draft Local Plan includes the notes:

*Landscape: There is potential for adverse landscape and visual impacts, although the site is well contained by mature green infrastructure and includes brownfield land (large agricultural building and related infrastructure) that would be removed by its redevelopment.*

This note is factually incorrect as the site is totally agricultural land and **does not comply with the Draft Plan’s own definition of brownfield land in any respect, nor with the definition of Previously-Developed Land in the NPPF.**

- iv. The site lies outside the settlement boundary of Liphook so is deemed to be development in the countryside. As such it is contrary to policy NBE1 “Development in the Countryside”.
- v. The site is being proposed for 67 homes at a density of 14.8/ha. This is the highest density of any of the proposed Liphook sites, even though it takes access from, and is adjacent to, very low-density housing at less than 8/ha. This will be contrary to policies DES1 “Well-Designed Places”, DES2 “Responding to local Character”, DES3 “Residential Density and Local Character” and DM10 “Locally Important and Non-Designated Heritage Assets”.
- vi. The Draft Local Plan states that the site scores above average in the Local Planning Authority’s Accessibility Study but on closer inspection it actually scores 5/8 which is not above the average. Due to its distance from facilities (Liphook Federation Schools 2.6km, Bohunt School 2.0km, Village Centre 1.6km) it will be a car led development resulting in increased traffic and congestion at peak times in The Square. This will be contrary to policies DGC2 “Sustainable Transport” and DM13 “Air Quality”.
- vii. Given the number of houses, the site requires the provision of a SANG but will be unable to provide one on site. With no credible location nearby, the proposal will be in conflict with policies NBE2 “Biodiversity, Geodiversity and Nature Conservation” and DGC5 “Provision and Enhancement of Open Space, Sport and Recreation”.
- viii. The site suffers from extensive surface water flooding (which is shown clearly in the diagram on page 411) and any proposal will need to carefully consider the impact it has on the site and in particular the Network Rail embankment on the northern boundary. Being unable to provide a suitable SUDS will be contrary to policy NBE7 “Managing Flood Risk”.

- ix. The site has no opportunity to connect to the existing foul sewer network other than via the already overloaded system in Ash Grove and along to the flood-prone Midhurst Road. Thames Water have acknowledged that the network is already at capacity and no additional facilities can be provided. Any developer must ensure that capacity is available and fund in advance any upgrades required. Without that, the proposal will be contrary to policy NBE8 “Water Quality, Supply and Efficiency”.
- x. In the introduction, EHDC makes much of wanting to hear the feedback of local residents. **“Your Voice Matters”**. It is worth noting that when developers submitted their most recent outline Planning Application in 2022, over 400 local residents and several statutory consultees formally objected to the development of this site. We feel strongly that these objections have been totally ignored.
- xi. When this site was first proposed for development in 2014, EHDC’s own Planning Officers rejected the plans for reasons that included and may be summarised as follows (*reference Notice of Refusal 22789/006*):
1. Severe detrimental impact on the operation and safety of the local road network,
  2. Due to its position, users of the development would be unable to make use of sustainable transport opportunities,
  3. The development, by virtue of the unsatisfactory pedestrian link to Chiltley Lane, was not in accordance with the requirements of the NPPF.
  4. The Local Planning Authority did not consider that the proposal met with criteria set in Policy CP10 of the Joint Core Strategy which stated that it would only be permitted where it:
    - met a community need or realised local community aspirations,
    - reinforced a settlement's role and functions,
    - cannot be accommodated within the built-up area, and
    - has been identified in an adopted Neighbourhood Plan or has clear community support as demonstrated through a process which has been agreed by the Local Planning Authority in consultation with the Parish or Town Council.

It was also noted by the Planning Officers as being contrary to policies CP1, CP2 of the Joint Core Strategy and saved policy H14 of the East Hampshire District Local Plan: Second Review.

We would stress that since the time of that refusal, nothing fundamental has changed that removes these contraventions.

**Taking all the above points into consideration, we strongly object to the proposal to include this site for potential development. It is not a sound housing allocation and would be contrary to the National Planning Policy Framework (December 2023).**

Once again, we are grateful for the opportunity to comment on this Draft Local Plan. While there are some useful points in it, we believe it is too full of existing policy contraventions (and contraventions of new policies proposed in the Draft Local Plan) and urgently requires amendment for it to go forward.

Moreover, for two of the three proposed development sites, we cannot find any significant benefits which would in any way offset the significant shortcoming of each. They clearly contravene EHDC's own planning policies and would continue to be deeply unpopular with a great number of the residents of Liphook.

We have indicated to you where alternative housing should be allocated and this is within the National Park and site LIP2 (addressed above). There are developers such as Harrow Estates who have put forward housing sites within the National Park which in planning terms are far more sensible and sustainable to develop. We urge you to look at the layout of Liphook and to realise that the sound option is to have new homes on land in the National Park albeit only on its edges.

As you promise to - listen to the voice of residents.

Yours faithfully,

For and on behalf of the **South and East Liphook Residents' Group**

*(Original Signed and delivered by hand)*

[Redacted signature block]

cc (by email)

[Redacted email address]

## **Sport England response – entered onto Commonplace**

### Policy DES1 Well-Designed Places - What are your comments on this policy?

Sport England welcomes the recognition within the policy of the need to create and design healthy and active places which enable people to engage in active travel and participate in physical activity and movement. Elements of the policy have synergy with our Active Design guidance principles and Sport England would welcome explicit reference to our Active Design guidance within the policy itself.

### Chapter 7 Enabling Communities to Live Well - How do you feel about this chapter?

Happy

### Policy HWC1 Enabling Communities to Live Well - What are your comments on this policy?

Sport England welcomes the reference and recognition of importance of Active Design within the policy.

It would be helpful to make reference to Sport England's Active Design guidance which has been recently updated in collaboration with Active Travel England and the Office for Health Inequalities and Disparities (OHID). There is a good deal of overlap between the policy and our guidance.



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

7<sup>th</sup> March 2024

Dear sir/madam

## **East Hampshire District Council Local Plan – Stagecoach Response**

Stagecoach South is the main commercial public transport operator across East Hampshire District and serves areas such as Alton, Bentley, Bordon, Clanfield, Four Marks, Horndean, and Petersfield. Some services operate on a commercial basis – that is to say, sustained by passenger use and fare revenue, including concessionary reimbursement. Others receive some level of support from the Local Transport Authority, in this case, Hampshire County Council.

Unlike bus services in some other parts of the country, the local network has recovered well after the pandemic with fare-paying passenger numbers over 95% of 2019 levels, although with concession patronage significantly lower. This has helped secure a largely stable bus network, even during this period of rapidly rising operational costs, avoiding the need for the service contractions seen in other regions. The bus industry is still being supported by DfT, through the £2 fare cap scheme which is likely to continue until the end of this calendar year. It has been difficult to measure the exact level of growth generated by this scheme but it has been particularly helpful in stabilising longer routes where the scheme provides the greatest value to passengers.

We support the broad objectives of the local plan and particularly in **Responding to the Climate Emergency and Delivering Green Connections**. However, we are concerned that there is scant reference to public transport and no mention of local bus as part of the solution. We lack assurance that *paragraphs 108 and 109 of the NPPF* have been applied in the choice of many of the sites selected across the District. Few of the locations are close to existing bus routes and even in the case of larger allocations, they are unlikely to be able to sustain an attractive, meaningful bus service capable of delivering true modal shift. Even if suitable contributions are secured to fund such services, they are unlikely to become commercially viable and would cease upon exhaustion of the funding, with the burden falling to the Local Transport Authority.

However, local authorities, more broadly, are under increasing budgetary pressure, with the very real possibility that, in the future, they will be **unable to continue support for bus routes that are not commercially viable**. Consequently, **we are concerned** that many of the allocations that are not currently served by existing bus services will be completed without any alternative to private travel. This not only does little to support the existing network, it adds further pressure to the overall transport system which affects the performance of other bus services, making them less attractive. In isolation, this may sound insignificant, but the collective effect of several smaller allocations has more impact.

We are particularly concerned about new settlements where there will be no educational provision for secondary school-age children and college students, who in the absence of a viable bus service, will have no option but to travel privately. This influences the mindsets of young people and the transport choices they make as they join employment and become part of the wider economy of the area. We welcome the ambition to make new developments self-sustaining but it is challenging to provide all the services and activities sought in a local setting and thus we fear this Local Plan will facilitate significant levels of car dependency.

This is in conflict with Hampshire County Council’s **Local Transport Plan (LTP4)** – a key objective of which is to “**significantly reduce dependency on private car**” as opposed to the latter becoming the default residual choice, despite this **Local Plan’s Policy DGC2, Sustainable Transport**, which places the private car as the 5<sup>th</sup> choice in its hierarchy of travel modes.

Whilst we recognise and support the objectives of the policy, what are the “genuine choices” of travel modes realistically going to involve and what will be the wider impact on transport and the local economy in general? As always, we would be very happy to discuss these points in more detail should you require further clarity.

Yours faithfully

[Redacted signature block]

[Redacted name]

[Redacted title]

Stagecoach South



East Hampshire District Council

Planning and Building Service  
Beech Hurst  
Weyhill Road  
Andover, Hants SP10 3AJ  
Telephone 01264 368000  
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Web site [www.testvalley.gov.uk](http://www.testvalley.gov.uk)

[REDACTED]  
**E-mail:** [REDACTED]  
**Your ref:**  
**Our ref:**  
**Date:** 04 March 2024

Dear Sir/Madam,

East Hampshire District Council Draft Local Plan 2021-2040 – Regulation 18 Consultation Plan – January 2024

Thank you for consulting Test Valley Borough Council (TVBC) on the East Hampshire District Council Regulation 18 Draft Local Plan 2021 - 2040. We welcome opportunities to engage and collaborate with East Hampshire Borough Council on strategic planning matters, policies and cross boundary issues such as housing, employment, the environment and transport.

Our adopted Test Valley Borough Local Plan covers the period 2011 to 2029. We are currently undertaking public consultation on Regulation 18 Stage 2 of our Draft Local Plan 2040, which covers the period 2020 to 2040. The consultation period commenced on 6<sup>th</sup> February and closes on 2<sup>nd</sup> April. We also undertook public consultation on our Regulation 18 (Stage 1) Plan 2040 for Test Valley Borough in February 2022.

The Housing Background Paper (January 2024) sets out the position for the potential for East Hampshire District Council's Draft Local Plan 2021 – 2040 to address the unmet housing need from the area covered by the South Downs National Park Authority. TVBC support this approach of close cooperation between the two local planning authorities to meet housing needs locally. Paragraph 1.9 of the Housing Background Paper states that future iterations of the Local Plan will be informed by further information on potential unmet housing needs across the sub-region as identified by the Partnership for South Hampshire (PfSH) Spatial Position Statement, and TVBC would support the reference to the Duty to Cooperate being reflected in the Draft Plan.

We note that the plan proposes meeting its housing requirement in full, with the bulk of delivery in the middle of the plan period. As identified in our draft Local Plan 2040, Regulation 18 Stage 2, we are also seeking to meet our proposed housing requirement in full.

Policy CLIM1 (Tackling the Climate Emergency) - TVBC welcomes the strategic emphasis in the plan on designing for carbon neutrality and resilience to future climate change over the

plan period and beyond. TVBC has declared a climate emergency and the overarching theme of countering climate change runs throughout our draft Regulation 18 (Stage 2) Local Plan, both in our strategic and development management policies.

Policy S1 (Spatial Strategy) and Policy S2 (Settlement Hierarchy) – It is noted that East Hampshire District Council's Draft Local Plan 2021 – 2040 sets out a similar approach to TVBC in terms of meeting housing needs in the most sustainable locations, while balancing this with smaller scale growth in settlements in the lower tiers of the settlement hierarchy. TVBC supports this approach to sustainable growth.

Policy NBE6 (Solent Special Protection Areas) seeks the protection of the Solent SPA from the effects of recreational impacts by requiring mitigation. The policy references the engagement with the Solent Recreation and Mitigation Partnership to which TVBC is also committed to working jointly with authorities in the region. Parts of both East Hampshire District Council and TVBC are within the catchment of the River Itchen and TVBC also welcomes the provision of policies to address nutrient pollution within this catchment and the impact from poor water quality on the Solent SPA.

Policy H7 (Gypsies, Travellers and Travelling Showpeople Accommodation) – It is understood that the GTAA which assesses the need for Gypsies, Travellers and Travelling Showpeople accommodation up to 2036 is currently being updated to reflect the plan period up to 2040. The need currently identified is for 66 Gypsies and Travellers pitches and 47 pitches for Travelling Show People. We look forward to the updated GTAA and how this will be addressed through the Draft Local Plan.

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

Yours faithfully,



Planning Policy and Economic Development Service

## The Alice Holt Community Forum - EHDC Regulation 18 Local Plan consultation response

Tue 05/03/2024 17:45

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.

The Alice Holt Community Forum hereby submits its response to the consultation.

\_East Hampshire Regulation 18 Local Plan

HOLT POUND:

Settlement Hierarchy

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

The Alice Holt Community Forum consists of representatives from each of the parish councils, communities and villages that surround Alice Holt Forest (the "community members") and Forestry England. Its members have considerable cumulative knowledge of Alice Holt Forest and the surrounding area. The objective of the Forum is to provide an efficient means whereby Forestry England and the local community can exchange views on matters relating to Alice Holt Forest, both through regular meetings and informally, thereby informing the management of the Forest. The views expressed below are the collective views of the community members of the Forum ("the Forum").

The Forum objects to the classification of Holt Pound as a Tier3 settlement. 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. The Forum also objects to strategic location HOP-1. Residential development of this site, would, as EHDC previously concluded, 'have an adverse impact on the rural character of the area and is disproportionate in size to the existing settlement.'

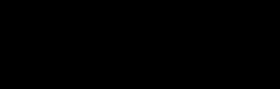
Holt Pound is a small settlement with around 100 houses located between Holt Pound Enclosure and Glenbervie Enclosure, both parts of Alice Holt Forest. These enclosures, like the remainder of Alice Holt Forest, comprise ancient woodland, are Sites of Importance for Nature Conservation (SINCs), and are part of the South Downs National Park.

The promotion of Holt Pound as a Tier 3 settlement and the development of the HOP-1 site would create huge pressure for further development of the green fields and spaces in and around Holt Pound, which would adversely affect the setting of the Forest, put pressure on the nature conservation value of the enclosures, and be damaging to the setting of the National Park.

As well as being sandwiched between the two Alice Holt enclosures, Holt Pound is also sandwiched between Rowledge to the south and Wrecclesham to the east. The Waverley Area of Strategic Visual Importance (ASVI) runs up to the county boundary.

The undeveloped part of Holt Pound—its green fields—are important in maintaining the semi-rural character of the immediate area and any major development of those fields would lead inevitably to its coalescence with Wrecclesham and thus Farnham, and decrease the

distinctiveness of Holt Pound and Rowledge. It would also be likely to be detrimental to the Waverley ASVI. The result would be to create a large urbanised area in the middle of the Forest, which would be materially detrimental to the setting of the Forest and the National Park. It would moreover increase the visitor pressure on the Forest, which is approaching full visitor capacity already, and thus be detrimental to the visitor experience of those currently making the 300,000 or so visits to the Forest every year.



The Alice Holt Community Forum

## Comments on Draft Local Plan Consultation

Fullers Road Residents Group [REDACTED]

Sun 03/03/2024 22:18

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.

For the attention of the East Hants Local Plan planners,

I write on behalf of a group of residents in Holt Pound, **The Fullers Road Residents Group**, formed in 2010 to try to defend the area from inappropriate development and loss of green space, numbering some 80 Hampshire residents and their families living in Holt Pound and eastern Rowledge.

Our response to your draft Local Plan is as follows:

### **PART A PLANNING FOR THE FUTURE OF EAST HAMPSHIRE, Policy S2 Settlement Hierarchy, Holt Pound**

As a settlement of fewer than 100 houses with a population less than 350, it wholly inappropriate for the Council to classify Holt Pound in the same Settlement Tier as the likes of Grayshott, Four Marks, Clanfield and others which have populations ranging from 1,400 to 5,900. We are in fact even smaller than Beech, Medstead and Ropley, all of which are in Tiers 4 and 5.

The Council is "borrowing" distant facilities in Rowledge, Wrecclesham (Waverley) and even Farnham, with conveniently placed hexagons on its map to make Holt Pound's lowly accessibility score of 3 inflate to 16.1 and become comparable to Grayshott's 21, for example, which anyone who has visited both settlements would consider grossly incorrect.

Your own Plan states the promotion is "due to its perceived proximity to Waverley services". Perceived and measured, calculated and proven are not the same thing. Holt Pound does not concede that it justly belongs to Tier 3 because of the Council's perception.

Few, if any, of the Waverley facilities are in fact within safe and easy walking or cycling distance from Holt Pound, virtually none of them are encompassed by your hexagons and Farnham does not even feature on your maps. To reach the limited Wrecclesham facilities some 1.8km away, it is too far to walk, the A325 is not safe to cycle on being laden with fast-moving traffic and has no cycle lanes (application for which was rejected by your own planning department). To reach those even more limited facilities in Rowledge, almost 1km away from Holt Pound's centre, Fullers Road has inadequate pavements (at the Waverley end) and, due entirely to Hampshire's own policy, is unsafe to cycle on being narrow with breakneck traffic speeds until the safety of the 20mph zone at the border with Waverley. Hampshire also has no street lighting, rendering cycling extremely dangerous for much of the year until the Waverley border is reached. As for Farnham itself, a 4.8km drive away to its nearest car park, it is unreachable by foot or cycle for all but the fittest or bravest. So the Council's Tier 3 assessment meets none of the necessary criteria on accessibility, environmental or sustainability grounds forcing, as it will, residents to make more use of cars and not less.

The Council uses these fallacious assertions "borrowing" Waverley's remote facilities to justify its opinion that Holt Pound is a Tier 3 example of a "focal point for the surrounding villages and rural areas in terms of the provision of local services and facilities" (Tier 3 Settlements from the East Hants Draft Plan (Managing Future Development)), which is manifestly is not. This is completely wrong as anyone who has visited Holt Pound would confirm in an instant. Furthermore, despite this borrowing, the Council has no obligation to respect the Farnham Local Plan whose jurisdiction lies out of reach at the Waverley border, and that Plan would never permit such an environmentally ruinous back-filling scheme on a greenfield site designated as Countryside, outside of the settlement policy boundary.

Holt Pound is not part of Waverley and its residents are proud to live in Hampshire and enjoy an environment, as described by your Council itself in 2018 as "...semi-rural character of Holt Pound". Yet the Council's own planning policies have already allowed that environment to be desecrated with two wholly inappropriate suburban-style development schemes on Fullers Road in the past few years, destroying two areas of the countryside in the process and leaving Holt Pound with almost nothing "semi-rural" left other than this one highly-visible remaining greenfield area to the north/east, part of which the Council now proposes to destroy.

Holt Pound is not, and does not wish to be, a suburb of Farnham which this Tier 3 classification presumes we already are, and which it will guarantee we will ultimately become. Holt Pound belongs in Tier 4 or 5.

#### **PART D SITES AND DRAFT POLICIES MAPS, Holt Pound HOP1**

I repeat, for this section, that Holt Pound enjoys an environment, as described by your Council itself in 2018 as "...semi-rural character of Holt Pound". Yet the Council's own planning policies have already allowed that environment to be desecrated with two wholly inappropriate suburban-style development schemes on Fullers Road in the past few years, destroying two areas of the countryside in the process and leaving Holt Pound with almost nothing "semi-rural" left other than this one highly-visible remaining greenfield area to the north/east, part of which the Council now proposes to destroy.

In 2018 the Council assessed that residential development of the proposed site "would have an adverse impact on the rural character of the area", "disproportionate in size to the existing settlement". Note not even "sem-rural" but "rural". The proposal to redraw the settlement policy boundary to include this site for development will, therefore, be in direct conflict with the Council's planners' very own intentions to keep Holt Pound as a (semi)-rural settlement.

Further, the site is shown for 19 houses yet the landowner's agent's own promotional website advertises the scheme as being for 50 houses. Even were you to permit 19 now, it is clearly understood that the landowner would push for more and their grander plan or compromise is far more likely to become the end result. And once you allow that to happen here and the precedent is set, the whole area of fields to the north and west will surely fall to development as the years go by, sealing the ultimate conjunction of Holt Pound with Wrecclesham and Rowledge, turning it into a suburb of Farnham and an outpost of Surrey in all but the technical detail.

Additionally, I repeat for this section that the inaccessibility to local services (wherever they may be) other than by car should invalidate this proposal.

It is wholly inappropriate to consider this site for inclusion in the Local Plan for the following additional reasons, many of which I am sure will have been stated by other respondents already:

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 visual 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 footpath connects through to Rowledge and Alice Holt forest – development would reduce access to these amenities.

The site is very near the South Downs National Park, so intervisibility needs to be considered.

### **We strongly object to this site on your Local Plan.**

I would also add that your online consultation system is poorly designed, hard to navigate and difficult and cumbersome to make comments in, especially in any depth of more than a few words.

I would not be in the least bit surprised to hear from residents on Tuesday (many of whom have already contacted me with requests for assistance using it, many of whom are neither young nor proficient in IT) that they have given up trying to comment, relying instead on the likes of residents associations and groups such as ourselves comment on their behalf. It may make it easier for you to collate the responses but that should not come at the expense of making it harder residents to comment.

Yours faithfully,

### **The Fullers Road Residents Group**



**RESPONSE TO EHDC DRAFT LOCAL PLAN, SE HANTS RAMBLERS GROUP - MARCH 2024**

We wish to object to the Local Plan in its current form due to the lack of explicit reference to and support of Public Rights of Way and ask that policies be included that make the Council's stance on these clear.

**1. CONTEXT**

In compiling our response to the draft plan we have made reference to the requirements as set out in The National Planning Policy Framework 2023 (NPPF). This document clearly states how the issues that are of direct interest to The Ramblers are to be addressed.

The NPPF sets out how the presumption in favour of sustainable development is to be achieved and, for plan-making, includes the following statement:

*“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; “ (para 11 page 5)*

Specific reference is made to public rights of way in paragraph 104 of the document, in Section 8 Promoting Healthy and safe Communities as follows:

*“Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails”*

Additionally in Section 9 Promoting Sustainable Transport, paragraph 108 refers to how transport issues are to be considered at the earliest stages of plan-making and development proposals. Meaning that opportunities to promote walking, cycling and public transport use are identified and pursued.

**2. COMMENTS ON DRAFT LOCAL PLAN**

The Draft Local Plan, as currently drafted, does not meet these NPPF requirements as far as public rights of way (PRoW) are concerned. Reference to PRoWs or National Trails is only to be found in the site allocations section (Chapter 12), when referring to a possible opportunity to link the suggested development site to the existing network. In the section that addresses the implementation of Policy NBE 11 one of the factors to be taken into account when considering development proposals is the 'visual perception' of the proposal from a PRoW. Otherwise the approach to be adopted towards PRoWs is, at best, ambiguous.

Nowhere in the main body of the draft plan is there a clear explanation of the approach that the Council intends to take towards protecting and promoting PRoWs. Nor is there a specific policy that encompasses what should be the Council's commitment to this aim. Reference is made to 'Green Infrastructure' the definition of which includes the word 'footpaths'. Also mention is made of the Local Cycling Walking and Infrastructure Plan that is to be used in conjunction with planning future development. But the impression given is that any consideration of the PRoW network is only to be given in association with specific development proposals. The Council has not made explicit commitment to promote and protect PRoWs generally.



Generally the term footpath is used in the plan loosely, such that it is often unclear whether reference is being made to a a PRoW or other paths. Where new paths are created these should have a permanence of being designated as a PRoW or adopted highway rather than the 'permissive' status of a footpath or greenway. This would avoid a situation where a permissive path can be easily revoked at a later date.

### 3. SUGGESTED REMEDIES

The Ramblers would wish to see the Council commit itself to the promotion and support of PRoWs through the inclusion of policies that relate directly to this. For example, policies might incorporate the following wording:

#### Policy 1

**The Council in partnership with the highway authority will seek to create new, and improve existing, footpath, cycle and bridleway links throughout the District. These would connect key parts of the district as well as increasing access to the South Downs National Park and improving connections between the parishes.**

This would ensure that a proactive approach is adopted that would underpin any proposals forthcoming from the Local Cycling Walking and Infrastructure Plan. In doing so such links should where possible have a permanent status of PRoW or adopted paths.

#### Policy 2

**New development should:**

- i) integrate with existing routes and public rights of way and wherever possible maintain, protect and enhance their function. Development that would sever, obstruct or otherwise have a detrimental impact on the existing or proposed network of public rights of way will not be permitted; and**
- ii) protect and enhance public rights of way, recreation paths and National Trails, including through the creation of new paths to improve the connectivity of the PRoW network.**

This would provide a clear commitment to maintaining and improving the PRoW network if affected by new development, also acting as the context for considering the proposals associated with the site allocations.

### 4. COMMENTS ON SPECIFIC SITE ALLOCATIONS IN OUR GROUP AREA

A number of points need to be made that apply to all the sites described:

1. The site plans need to include clearly the PRoWs that both abut and cross the sites;
2. Mention needs to be made regarding the expectations on how existing PRoWs crossing the sites are to be maintained, highlighting the need to provide a suitable 'green corridor'; and
3. When the sites are being developed it needs to be made clear that the PRoWs have to be kept accessible during the construction period as well as after.

**Specific comments on the allocated sites identified for the SE Hants area**

**HDN1 - Land at Woodcroft Farm**

- It is noted that currently the PRowS around the site are ill defined. May be as a result of the adjoining development, but this needs to be highlighted as an issue to be addressed.
- On the site map it would be useful to identify the PRowS abutting the site as bridleways and include reference to these in the constraints and opportunities section (C&O).

**HDN2 - Land South of Five Heads Road**

- The bridleway (Bridleway 34) needs to be clearly marked.
- Representations have been made in respect of the planning application 60033 concerning the need to maintain the existing hedgerow and trees and keep a landscaped area between the bridleway and the proposed housing development.
- It is unclear which are parts of the PRow network that the potential to connect to is suggested - is it FP 16/3 and FP 14/2? If so, then the point on the map this is shown needs to move to those locations and the footpaths shown.

**HDN 3 - Land north of Chalk Hill Road**

- The site map provided is incorrect as it doesn't show FP 17/1 that crosses the eastern part of the site, nor the route of FP 21/1 that runs along the southern boundary. The distinction between the 'informal paths mentioned in the C&O section and PRowS needs to be explained and also how these are to be treated.
- A commitment to ensuring that the existing PRowS are kept and remain as green corridors is needed.

**CFD 1 - Land at Clanfield County Farm**

- Since reference is made in the C&O section linking the site to the PRow network over the adjoining recreation area, it would be helpful to show this on the site map.

**CFD 2 - Land at Drift Road**

- The PRow crossing the site is an important link between Drift Road and White Dirt Lane and needs to be kept. The C&O section should reflect this and confirm the importance of this route.

**RLC 1 Land at Deerleap (north) & RLC 2 Land at Deerleap (south)**

- Shipwrights Way and Staunton Way mentioned incorrectly in the site description for Deerleap north. They run along Redhill Road to the north of the north site and to the west of the south site.
- It would be useful to show these routes on the respective site plans given their importance
- Mention of the bridleway to the west of Deerleap (south) site needs to be made and shown on the site plan.

**RLC 3 Land at Oaklands House**

- Having mentioned the possibility of linking the site to Shipwrights Way and Staunton Way to the east in the C&O section, mention needs to be made also of linking the development to FP 28/1 which meets Whichers Gate Road (B2148) opposite the site. The road is already busy and with the development to Havant Thicket Reservoir and future housing development in the area is likely to become busier. Consideration needs to be given to how users of this footpath as well as Shipwrights and Staunton Ways can safely cross the road.

**RLC 4 Land at Little Leigh Farm**

- Currently, on the southern boundary of the site, off Worldham Road, to the south of the hedgerow, there is an informal track. This could be replicated as part of the new development to assist with gaining access to FP26/1 to the east of the site.

**CTN 1 Land at Parsonage Farm**

- Detailed comments have been provided by The Ramblers concerning the planning application for this site - 59998 - as it affects FP 36 which runs along the northern boundary of the site. These question the impact of the landscaping might have on the enjoyment of the path and extent it might obstruct it in the future.
- Connecting the development to the PRoW as suggested in the C&O section was not included in the planning application. Such a connection would not add greatly to the network as an improvement so would not be one that The Ramblers would necessarily recommend.

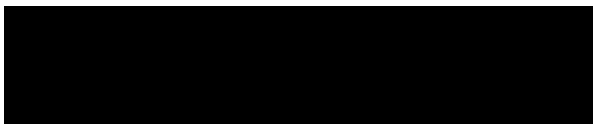
**CTN 2 Land at the Dairy**

- Unnecessary to make the point in the C&O section that this site could be connected to the PRoW network

**LOV 1 Land rear of 191 - 211 Lovedean Lane**

- Connecting the site to FP 28/1 is supported provided it conforms to the character of the PRoW at this part of the boundary.

Contact:



SE Hants Ramblers Group

# The River Wey Trust

A Charitable Incorporated Organisation. Registered No. 1177871



[www.riverweytrust.org.uk](http://www.riverweytrust.org.uk)



**By Email and Post**

EHDGPLAN REC

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

**14 FEB 2024**

**11<sup>th</sup> February 2024**

**Re: Comment on the 2024 Draft East Hampshire District Council Local Plan**

**Dear East Hampshire District Council Planning Policy Team**

**We confirm that The River Wey Trust has submitted via the January 2024 Draft East Hampshire Local Plan Portal our comment on the proposal to allocate site reference LIP 1 for development.**

**For your ease of reference, we include in this letter our detailed comments.**

**We reiterate that we are now formally requesting that the site allocation reference LIP 1 be removed from the Draft Local Plan for the reasons stated.**

**Yours faithfully**



**The River Wey Trust**

# The River Wey Trust

A Charitable Incorporated Organisation. Registered No. 1177871

[www.riverweytrust.org.uk/](http://www.riverweytrust.org.uk/)



## RWT Comment on January 2024 Draft East Hampshire Local Plan issued for public consultation <https://ehdclocalplan.commonplace.is/>

Land North of Haslemere Road Liphook pages 405,406 & 407

In this draft EHDC plan there is a proposal to use the site [ref LIP 1] shown below to construct 24 houses. The problem is that the bulk of the site is within the River Wey Conservation Area [RWCA]

Conservation areas are a well-established designation employed by local planning authorities, including East Hampshire District Council, to manage areas of special architectural or historic interest.

Due to space constrictions, it would not be possible build houses next to Haslemere Road, so all the proposed new houses would be built inside the RWCA. The RWCA was designated by EHDC in May 1983 in recognition of its importance to the conservation of a historical landscape and its wildlife.

One of the RWCA stated conservation objectives is that *“the area is valued for its largely rural historic landscape that was created for farming and industrial (18/19th century) purposes.”* It is inconceivable that modern housing development is compatible with the RWCA conservation objectives, particularly conservation of an attractive rural environment, its biodiversity, and the water quality of the River Wey.

There is no possible way that any biodiversity enhancement by the developers within the Conservation Area could mitigate the loss of fauna and flora which include regular sightings of owls, bats, deer, badgers, foxes, and a multitude of bird species. A housing development on this site would seriously affect the effectiveness of the current wildlife corridor so important to conservation.

On page 406 under the heading of Built heritage item 5 EHDC emphasises the importance of this Conservation Area. The proposal contradicts the EHDC statement that the RWCA is valued.

- **Built heritage (5):** majority of the site lies within the designated River Wey Conservation Area, which is valued for its largely rural historic landscape that was created for farming and industrial purposes.

Conservation areas exist to manage and protect the special architectural and historic interest of a place - in other words, the features that make it unique. The proposed site for allocation of 24 houses is an integral part of the RWCA and any development would have a detrimental effect on this historic, scenic and wildlife friendly special area.

Sustainability is part of the whole integrated history and landscape of the River Wey Trust. Any development will have a detrimental effect on the River Wey Trust's activities.

The Draft Local Plan acknowledges significant constraints for a sustainable drainage system [SuDS]. Any building in the LIP 1 site will result in increased surface run-off both during and after construction polluting the environmentally sensitive River Wey. Flood risks downstream will also be increased.

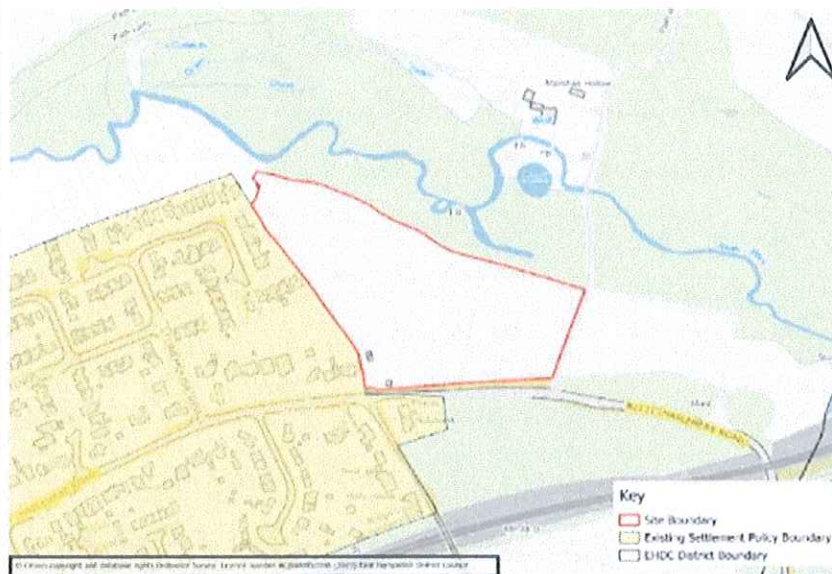
The River Wey Trust is a charity which was established in 1984 to coordinate historical, environment and wildlife conservation and management along the southern branch of the River Wey for the education and benefit of the public.

We consider the construction of dwellings on the LIP 1 site will directly affect our aims and objectives and the status of this important Conservation Area.

**Accordingly, The River Wey Trust formally requests that this site allocation is removed from the Draft Local Plan.**

**LIP1 – Land north of Haslemere Road, Liphook**

LAA Reference	LIP-005
Site Size (Ha)	2.5 ha
Existing Use	Agriculture
Proposed Future Use	Housing
Proposed Number of Homes	24

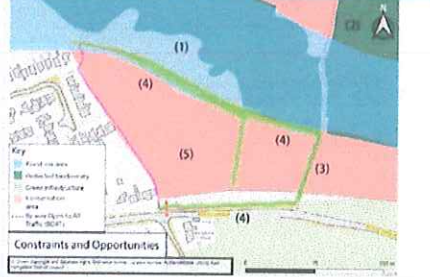


**Site Description**

The site is located on the north-east edge of Liphook. Its western boundary adjoins a residential area, whilst the Haslemere Road and a public right of way form the southern and eastern boundaries respectively. The River Wey is located to the north. Land to the north and east of the site is undeveloped.

The site is greenfield pasture but contains extensive vegetation, including mature hedgerows and trees that form part of a wider green network of woodland within the River Wey valley. The land slopes down towards the River Wey, with a notable ridge traversing the site from north-west to south-east. There is a field entrance (gated) on the Haslemere Road and an existing access track on the eastern boundary. Boundaries include mature shrubs and trees, with occasional views into the site from Haslemere Road. Housing to the west and south is predominantly of detached houses on plots that show wide variations in their size and orientation.

LIP1 - Land north of Haslemere Road, Liphook



- Constraints and Opportunities**
- List of constraints & opportunities**
- Flood risk (1):** small parts of the site are susceptible to fluvial flooding as they are located in Flood Zone 2. These flood risk areas affected the northern boundary of the site. There is also identified potential for groundwater flooding.
  - Biodiversity (2):** site is adjacent to two SINCs (Marshes Hollow and River Way at Heyshott House) that are located within the valley of the River Wey. Recreational impacts on the Waddan Heath Phase II Special Protection Area (SPA) would need to be appropriately mitigated.
  - Access (3):** potential to connect the site to the public rights of way network via the Dry-way Open to All Traffic (BOAT) that runs along the eastern boundary, enabling healthy & Active lifestyles.
  - Access:** connection to the local road network could be achieved via the existing field entrance in the south-west corner of the site.
  - Green infrastructure (4):** mature field boundaries and trees are important characteristics of the site, contributing to local green networks and helping to integrate the site with the valley of the River Wey.
  - Built heritage (5):** majority of the site lies within the designated River Wey Conservation Area, which is valued for its largely rural historic landscape that was created for farming and industrial purposes.
  - Landscape:** there is potential for adverse landscape and visual impacts, depending on site layout, building typologies, building heights and the massing of built form.

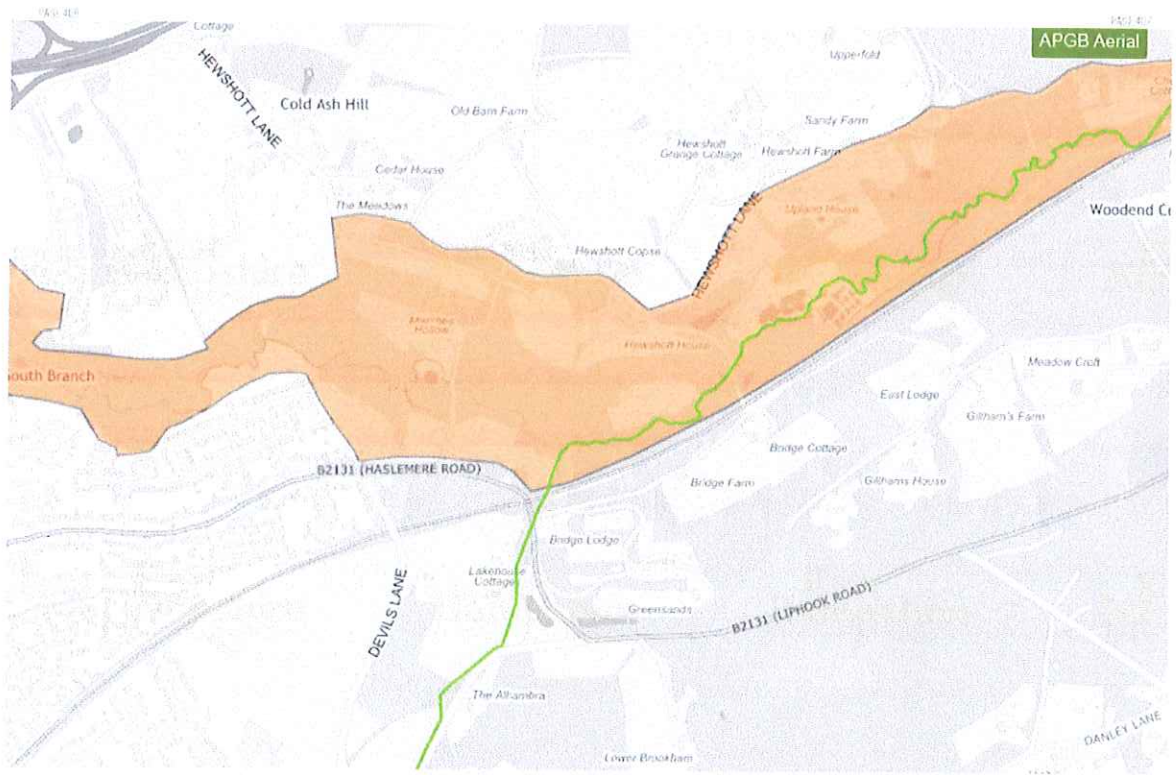
LIP1 - Land north of Haslemere Road, Liphook

**Summary of Reasons for Inclusion**

The site scores above average in the Local Planning Authority's Accessibility Study and could be integrated with Liphook by extending existing pedestrian infrastructure on Haslemere Road. There is good potential for connections to the adjoining BOAT, which could support healthy and active lifestyles for residents. Impacts on environmental constraints (biodiversity, flood risk, green infrastructure) could be avoided or mitigated by appropriate design and layout. In particular, avoiding development to the north of the ridge line within the site could avoid areas of flood risk and create opportunities for a net gain in biodiversity through new planting and habitat improvements. Existing green infrastructure could be augmented to maintain coherent green networks. Impacts on built heritage (which in this case is a landscape as well as a townscape consideration) could also be mitigated through avoiding development in the north of the site and through appropriate building design and landscaping, to maintain a rural character. The potential impacts due to recreational disturbance on the Waddan Heath Phase II SPA could be mitigated without the on-site provision of suitable alternative natural greenspace, which would be impractical to deliver. The dimensions of the site facilitate an 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. by a £100 contribution) would be required towards projects to increase capacity at Liphook Village surgery.
- Access:** A vehicular access point onto Haslemere Road and new walking and cycling infrastructure and connections would be necessary to support development. Improvements to the adjoining public right of way (e.g. a new connection) may also be required.
- On-site drainage:** Significant constraints for infiltration sustainable drainage systems have been indicated. Appropriate infrastructure will be required to mitigate flood risks.
- Cumulative pressures of development on local infrastructure** will be dealt with via the Cumulative Infrastructure Levy (CIL).





A statement issued jointly by residents local to Streamacres Fields in Holybourne and by those of [REDACTED] (South Alton Plan)

We love living in the Alton area with ready access to life enhancing green spaces.

Whilst recognising the need for further development in and around our town, we welcome the decision enshrined in the draft Local Plan to suggest no large scale development of green field sites currently enjoyed for their recreational and well-being value. We value the unique setting and landscape that surrounds the town.

Both Windmill Hill fields (South Alton Plan) and Streamacres fields in Holybourne make a hugely positive contribution to the quality of life of local people. Large scale development in these areas would destroy the sense of well-being, security and safety for those residents. They should not be promoted for development in the Local Plan or in the Alton Neighbourhood Plan.

We welcome recognition in the draft Local Plan that *“the countryside can provide a sense of containment to our towns and villages, forming part of their identity.”* This desire to protect green spaces adjacent to current dwellings mirrors our feelings about Holybourne and Windmill Hill fields. Both sites are massively valued by the local communities.

We urge the Alton Neighbourhood Plan steering group to explore the plentiful opportunities to develop brownfield sites within the town in order to fulfil the quota as set in the Local Plan.

*This statement has been composed and released by representatives of the Holybourne Village Association and by current and former Local Authority Councillors who have been amongst those fighting to protect the heritage and landscape of the town for the last thirty years.*

[REDACTED] *Holybourne Village Association on behalf of the above.*

18/2/2024

East Hampshire District Council  
Penns Place  
Petersfield  
GU31 4EX



26<sup>th</sup> February 2024

## East Hampshire Local Plan 2021 -2040 Cycling & walking comments.

### 1. Introduction

- Thank you for the opportunity to comment on the new draft local plan. Comments are primarily focused on the south of the district & limited to walking & cycling within East Hampshire District. These issues are widely spread in the draft plan. In most instances text from the document that's commented on is copied into the response.

### 2. General Points:

- **LTN1/20** is the mandatory central government document for cycling infrastructure but isn't referenced in the plan. This is an omission as HCC could lose funding if a development was non-compliant. HCC have published guidance documents TG10; TG17 & TG19, on how they will comply with LTN1/20.
- There seems to be a lack of coordination within Hampshire on LCWIP timetables, made worse by LCWIP's being actioned in small projects within districts instead of considering longer viable routes including those across district boundaries. For example the current improvements NCN22 in Havant stops short of Rowlands Castle where safe cyclable routes divide
- It's a concern that East Hants LCWIP isn't moving ahead. This will further reduce funding of cycling & walking infrastructure in East Hants. Neighbouring districts, Chichester & Havant, are moving ahead & implementing LCWIP's leaving East Hants stranded.

### 3. Cycle routes surfaces.

- A large proportion of, "**off road cycling / walking routes**" are in poor condition with loose, worn out muddy surfaces that minimise cycling & walking. Cyclists are often forced onto busy roads with close passing. In the south of East Hants District the geology includes large areas where a clay soil surface on chalk beds that come to between 1 & 4 metres of the surface. In such areas **Loose gravel surfaces** are noisy to cycle & sink into the mud resulting in muddy off road tracks that within a short period few people can cycle. **Tarmac** has a lot longer life; it's far better to cycle & through life costs are lower. SDNPA use **compressed chalk surfaces** for cycling/walking on former railway routes with good foundations, giving a relatively inexpensive route that, with good maintenance, works well over substantial periods. Care is needed as it gets damaged by: motor traffic, flowing water, tree drip, & on sharp bends or steep inclines. It's only an option in a few applications. **Asphalt** is a low noise surface than **Tarmac**. It's used where cycle routes are close to sensitive wild life, such as. Bats or Raptors. **Havant's Hermitage Stream route** uses **compressed fine gravel with a sealed surface**. It's now starting to break up but has been successful for 13 years without major repairs. A lot of people walk or cycle it. (Possibly around 200-300 transits a day.) **Loose gravel** shouldn't be used for cycle routes. Even with wide tyres it's slow & noisy to cycle, needs more effort. has more punctures & more minor accidents.
- **Cycle route priorities. Routes within & between large communities**, need to be: direct enable safe cycling, should not terminate at cross district boundaries, fast roads or roundabouts that are unsafe for cycling. There are examples of all these in & around the southern parishes.

- **Cycle/walking routes with a potential for high levels of use rates** should have a high priority for construction, repair & maintenance.
  - **An inappropriately low proportion of funding goes into urban & inter town routes** for cyclists & walkers as opposed to more sparsely populated areas.
  - **Cycling to school** isn't adequately supported. At this stage a healthy lifestyle can be established. Opportunities to convince people of the benefits of cycling mustn't be ignored
  - **There's a shortage of cycle parking that's secure & weather resistant &** close to well used venues & shops. This needs to be addressed if utility cycling is to increase. **An example of good design is in Hambledon Road shopping centre in Waterlooville.** Close to the underpass to the town centre.
  - **Do employers in East Hants adequately encouraging cycling to work?** From noting numbers cycling into Portsmouth for work (especially to Eastern Road) there seem to be opportunities to considerably increase cycle commuting in the south of East Hants.
  - **Routes for less mobile members of the community to exercise** should be available.
  - **Health & well-being.** There seems to be a lack of appreciation of how effective walking &/or cycling can help people to stay in good health & reduce demands on public services. **Horndean's walking to health group** closed about 15 years ago. They only had one route that was safe enough for most participants. That position hasn't changed.
  - **East Hants is hilly.** Cycling might increase if the use electric boosted bikes was encouraged. They reduce effort used on inclines & can increase numbers cycling.
- 4. Issues within the south of East Hants District**
- **Horndean: Merchistoun & Five Heads estates** (Between Portsmouth Road & Catherington Lane, & including Catherington Lane.) have a lot of traffic & parked vehicles. The estate is large with 4 schools, including a large comprehensive. Cycling & walking especially to schools needs to increase but the road situation makes that difficult. **Horndean Technology College**, has good secure cycle storage & two other schools have some cycle storage. Children cycling & walking to these schools are subjected to unnecessary risks from both moving & parked motor vehicles. There's a need to reduce traffic volume & speed on the estate. Children to be helped & encouraged to walk or cycle safely to school, as opposed to travel by car. As suggested on **page 117 of East Hants LCWIP Technical report dated Oct 2019**; a 20mph limit & reduced on road parking is urgently needed on this estate.
  - **Along the A3, south of Causeway Junction**, there's a shared northbound bus route/cycle track but only a narrow shared & obstructed pavement for cycling & walking in both directions. Priorities between modes of travel on the pavement repeatedly change reducing safety. This cycle route is well used especially to Horndean TC.
  - **Potential cycle routes into Horndean TC:** I understand two potential cycle routes into the school are awaiting funding, from the East of Horndean Development. From East of Horndean & from North Horndean / Clanfield.
  - **A continuous cycle route is needed from Wecock via Lovedean & to Horndean TC** (The maximum return journey is about 6km with no bus route.) A lot of children walk it each day. Havant BC built a cycle/walking route, as part of a housing development, from BW41 at Wecock to Woodcroft Lane. The remaining gap to Victory Avenue is mainly in Havant Borough. BW41 from Wecock to Anmore Dell has been blocked for cycling since about 2004. The culver (built in about 1400 AD) under BW41 collapsed in 2002. Up to then it was used as part of the safe cycle route round the north of the Portsmouth conurbation.
  - **NCN222 Cycle route. Parallel to A3 through Horndean & Clanfield.** Needs to be reviewed. See next 2 bullet points
  - **Cycling/walking from North Horndean & Clanfield to Horndean T.C.** The best option is described on page 124 of the "**Cycle Plan for East Hants**" dated 2004. It's partly through a proposed housing development that's offering to accommodate this route on footpaths 21 & 17. Problems include **(a)**. The legality of cycling on Down Road is disputed. **(b)**. Parts of footpaths 21 & 17 are steep for cycling but will be mainly traffic free & the route could be moved to reduce the gradient on this part of the route.

- **NCN222 in Horndean** is risky to cycle north of Causeway junction with close passing by fast traffic, & no cycle provision other than over the A3(M) bridge. South of the bridge there may be room for a shared pavement. It's difficult to see how the A3 route through the former brewery site could be made safe for cycling. Its narrow with buildings up to the edge of the pavement & a lot of traffic. A shared pavement along the A3 north from the brewery site to of Downwood Way. may be possible
- **NCN link from NCN222 in Horndean to NCN22 in Rowlands Castle.** Is mainly in SDN Park but both ends are in the EHDC local plan area. The link was implemented by Hampshire Highways who added cycling route markers & a 40 mph speed limit. Route markers have disappeared and need permanent replacements. The route has been an unexpected success. It was proposed by Rowlands Castle PC to get more people to use RC station. I've seen no evidence of that. Many cyclists now use the link to cycle round the north of Portsmouth Conurbation. The east to west route being used is: The South Coast Cycle Way from Chichester Centre to Westbourne, Monks Hill & Woodberry Lane to Rowlands Castle, NCN Link to Horndean, Five Heads Road, (& some via BW34), Catherington Lane & Frogmore Lane, Milton Road. Sunnymead Drive. The route to Denmead was via Wecock & BW41 but the culvert collapsed in 2002 leaving 400m of all year round mud in Horndean Parish.
- **Rowlands Castle Road in Horndean.** Going west to the Horndean boundary the road is narrow with high hedges giving short sight lines. It's mainly residential with 3 major changes planned. **A).** A continuing increase in cycling as part of the NCN link. **B).** A large new older people's development whose main way out, for those with enough mobility, will be along RC Road to Horndean Centre. **C)** A new pedestrian & walking route from the East of Horndean development to the north & west. There's an urgent need to make this road safer for all these groups. With the present moderate amount of motor traffic. **1)** A 20mph limit. (For which there is currently a campaign.) **2)** Prohibition of on road parking. & **3).** A wider pavement is all urgently needed. It's now becoming less safe & issues will increase over the next 3/4 years.
- **NCN22 in Rowlands Castle.** On exiting Havant Borough, Prospect Lane is narrow with fast traffic, close passing & poor road edges make cycling risky. Traffic calming is needed. Junctions on & off the B2148 are not good. The access to BW24 has been improved but is not good for cycling. The surface of BW24 is rough & often wet & muddy. The junction onto 'The Green' has poor visibility mainly due to excessive on road parking. It's risky to cycle.
- **Clanfield Junior School** The junction between Chalton Lane South Lane & East Meon Road gets badly congested with parking traffic twice a day in term time. This can be hazardous for cyclists & pedestrians. A 20 MPH area around the school would improve safety. Better walking & cycling routes to school are needed.

**5. Detailed comment on the draft Local Plan 2021-2040.**

- **Page 49 Our Journey to net zero.**

*All the comments on page 49 are supported & especially a). & b.).*

a). Improved walking & cycling connections.

b). New developments to be accessible by walking & cycling

**Page 55: CLIM1.3d.** Any new transport infrastructure (roads, footpaths, cycleways) has been designed to prioritise walking, cycling and the use of public transport;

e. Infrastructure to support the use of zero-emissions vehicles would be provided **(Supported).**

**Page 147. DES1.1. Well-designed places Policy (d).** integrates well with existing streets, cycle and walking connections and where relevant extends these movement networks within a development site, to create attractive, accessible, safe and direct routes that are inclusively designed; **(Agreed)**

**Page 147 (g).** Within Tier 1 and 2 settlements enables residents to "live locally" by accessing some services and facilities within convenient walking or cycling distances, taking account of their varied needs and how the delivery of services may change over time; **(Agreed)**

**Page 155 Policy DES2.1h.** Provide car parking in ways that would remove cars from the street or that would not enable cars to visually or physically dominate local streets, whilst being safe and convenient to

use for all residents and visitors; in several of our communities. **(Note.)** This is essential to improve the safety of streets & to ensure reduce the risks that pedestrians & cyclists won't be endangered.

**(Agreed)**

**Page 156. Policy DES2 1i.** Provide enough room within the public realm, including street spaces and along new pedestrian and cycle routes, to allow for the planting and growth of contextually appropriate vegetation, including native tree species that would offer shade and shelter. **Comment:** Enough space must be allowed so that the vegetation does not overgrow the cycle route narrowing the track or that users could be obstructed or injured. Trees & hedges must be well back from the cycle/walking track to avoid surface damage from tree roots or tree drip or from cyclists being cut by brambles or thorns that are also a primary cause of punctures. Track maintenance must be adequate to avoid these situations occurring.

**Page 175: Policy HWC1.1 Health and wellbeing of communities**

**HWC1.1 Developments should contribute to healthy and active lifestyles through the provision of:**

- a. Active design principles which support wellbeing and greater physical movement, and an inclusive development layout and public realm that considers the needs of all;
- b. Access to sustainable modes of travel, including safe, well-designed, and attractive cycling and walking routes and easy access to public transport to reduce car dependency;
- c. Access to safe and accessible green infrastructure, including to blue corridors, open spaces and leisure, recreation and play facilities to encourage physical activity;
- d. Access to local community facilities, services and shops, which encourage opportunities for social interaction and active living. **(All 4 points are agreed especially b.)**

**Page 180 Delivering green connections. Para 8.3** Transportation infrastructure includes: • footpaths, cycleways and bus lanes • roads and railways; and • electric vehicle charging points. **(Agreed)**

**Para 8.5** This Local Plan will play an important role in safeguarding existing infrastructure. It will also ensure that new development includes appropriate infrastructure to meet the needs of a growing population, whilst trying to reduce the reliance on the need to travel by the private car and making travel options that benefit our environment i.e., cycling and walking, a priority. **(Agreed)**

**Page 188 Policy DGC2: Sustainable transport Para 824.** The DfT and the Highway Authority of HCC, in the draft fourth Local Transport Plan 4, recognise that rural settlements will continue to need the car for varying journey purposes, hence why it is also prioritising the use of sustainable modes of public transport, walking and cycling for all those that can utilise it. **(Noted)**

**Page 189 Figure 8.1 02 Cycling & Riding.** It's misleading to link these 2 modes. Cycling is able to provide a reasonable means of transport for, commuting to work, utility journeys and health & well-being as well as providing the leisure use that Horse riding is now limited to.

**Page 190 para 8.25** Splitting the area into a honeycomb grid of hexagons and scores for each hexagon according to the relative accessibility to services and facilities, that are within a walkable and cyclable distance of 10 minutes from the central point of the hexagon. **This is an inappropriate, misleading & unhelpful way to measure potential cycling. Routes should meet the needs of users. Comparison of user numbers on different routes is a starting point. As is a knowledge of starting & finishing points of potential routes that might attract significant numbers of users.** The south of the district is part of the Portsmouth conurbation. A significant number of people cycle far further when a route meets their needs. Commuter cycling from PO7/PO8 especially to Eastern Road industrial estates Portsmouth is significant as it is between Havant & Chichester that HCC & West Sussex CC are undertaking improvements to increase cycling & cycling safety on the A259 route. [My experience of cycle commuting to work is small totalling

about 4 years split over several periods. varying between 2/3 weeks of 3km/day return to about 3 years of 20km/day return].

**Page 190 Para 8.26 Walking and cycling benefits the environment** by being the least carbon emitting modes of transport & having potential for reducing air pollution. Active travel modes greatly benefit the physical health and mental well-being of residents. The opportunities for engaging in walking and cycling will not be limited to the stereotypical purposes of leisure but the Local Plan aims to greatly expand on other journey purposes that utilise cycling and walking as the main modes of travel, specifically education, shopping and employment. By development being located in the most accessible areas, there is greater opportunity for the active travel modes to be utilised more frequently and to connect between different places. **(Para 8.26 is agreed)**

**Page 190 Para 8.27 The district's Local Cycling Walking and Infrastructure Plan (LCWIP)** will be used in conjunction with planning future development in the Local Plan Area. The LCWIP details recommendations for attractive and well-designed future walking routes and cycling networks that best connect places in the district by these active modes. The LCWIP will help inform of the best linkages between existing and future community needs and what further infrastructure or linkages are required to enhance travel by cycling and walking in the district. Use of the LCWIP in conjunction with the East Hampshire Accessibility Study and settlement hierarchy will ensure the most sustainable locations for development are identified, as well as the accompanying walking and cycling infrastructure that is required to improve the active travel network and increase patronage in the district during the life of the Local Plan. **(My view is that** the LCWP will only help with the routes within the district. It will do little to help with the cross border routes until a further assessment is made. Hampshire Highways should be able to help in that respect.)

**Page 191. Para 8.30 Final sentence.** "The Local Planning Authority also supports the Highway Authority in placing a strong emphasis on decarbonising the transport sector by (for example) prioritising the more sustainable travel modes of walking and cycling, where feasible in the rural context of East Hampshire". **Note:** This is likely to be small compared with the potential increases in cycling possible in the urban south of East Hants if artificial obstructions were removed. They include: gaps in cycling infrastructure caused by lack of working crossings across both local authority boundaries & the A3(M). In this instance National Highways is not the problem. The 3 routes with bridges could all be in service for cycling if access routes are not to be obstructed. All 3 routes could support a lot of cycling & some walking & reduce motorised traffic. One is planned to open as part of the East of Horndean development. The other 2 are in Havant Borough. The access to one is obstructed that currently restrict cycling from East Hants to Havant.

**(Since May 2018 Cycling UK has run a return to cycling initiative in PO7/PO8. So far over 60 people have participated. Most now cycle confidently over substantial distances increasing the pool of confident & competent cyclists in the area & increasing the local pressure for better cycle routes.)**

**Page 192. DGC2.1. & DGC2.2** are agreed

**Page 193 Paragraphs 832, 833, 834 835 & 836** are generally agreed but especially in winter there is little opportunity for most of those with disabilities to walk off road in Horndean.

**Policy DGC2 Sustainable transport**

**Page 193.** I agree with the points in paragraphs on page 193.

**Page 251: FIGURE 10.1: COMMUTING FLOWS TO/FROM EAST HAMPSHIRE IN 2011.** For East Hampshire the most informative data on commuting would probably be number cycling daily into Portsmouth Havant & Fareham as opposed to what is provided on page 251.

**6. SUMMARY:** There's a lot of information in the document and, an indication of a will to increase cycling & walking in the future. It's still however concerning how few good, off road cycle routes there are in the south of the district & how far the district has fallen behind the bordering districts of Havant Borough & Chichester in cycle route provision. Currently the only safe routes to cycle into Havant Town from Horndean/Clanfield are a long way round. I would have expected to have seen statistics such as to the user rates for existing routes. They indicate how well options work & can help with design decisions & obtain funding for future routes. For example during the first half of 2022 the combined number of transits of pedestrians & cyclists along the south end of Centurion Way in Chichester was about 1.000 transits/day. I understand that the cycling rate along Eastern Road in Portsmouth is significantly higher than that.

**7. REFERENCES**

- EHDC LCWIP Technical report V1.2 dated Aug 2020
- A Cycle Plan for East Hampshire 2004

██████████  
A cycling UK local campaigner

[REDACTED] Whitehill & Bordon Community Party - Local plan  
response

[REDACTED]  
Wed 06/03/2024 18:45

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

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

Dear East Hampshire District Council,

Our view is that the Whitehill & Bordon Community Party (as a legal entity) is duty bound to respond to the Local Plan Consultation 2021-2024, as the elected 'local voice' representative of residents that holds all 15 seats on Whitehill Town Council, all six seats that cover Whitehill, Bordon, Lindford and Greatham for East Hampshire District Council and the sole Hampshire County Council seat for Whitehill, Bordon and Lindford.

Our response is as follows:

Chapter 1 Introduction and Background - How do you feel about this chapter?

**Satisfied**

Chapter 2 Vision - How do you feel about the Vision?

**Neutral**

Chapter 2 Vision - What are your comments on the Vision?

**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?

**Satisfied**

Chapter 2 Objectives - What are your comments on the 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?

**Satisfied**

Policy S1 Spatial Strategy - What are your comments on this policy?

**Satisfied, however further infrastructure needs built to support the extra dwellings.**

Policy S2 Settlement Hierarchy - What are your comments on this policy?

**Satisfied that Bordon has been placed in Tier 2.**

Chapter 3 Managing Future Development - Please provide any further comments on this chapter

480



**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?

**Dissatisfied**

Policy CLIM1 Tackling the Climate Emergency - What are your comments on this policy?

**Further work needs done to meet the targets**

Policy CLIM2 Net-Zero Carbon Development: Operational Emissions - What are your comments on this policy?

**Further work needs done to meet the targets**

Policy CLIM3 Net-Zero Carbon Development: Embodied Emissions - What are your comments on this policy?

**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?

**Further work needs done to meet the targets**

Policy CLIM5 Climate Resilience - What are your comments on this policy?

**Further work needs done to meet the targets**

Chapter 4 Responding to the Climate Emergency - Please provide any further comments on this chapter

**Nil**

Chapter 5 Safeguarding our Natural and Built Environment - How do you feel about this chapter?

**Dissatisfied**

Policy NBE1 Development in the Countryside - What are your comments on this policy?

**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?

**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?

**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?

**Agree with this policy.**

Policy NBE5 Thames Basin Heaths Special Protection Area - What are your comments on this policy?

**Agree with this policy however is the funding available?**

Policy NBE6 Solent Special Protection Areas - What are your comments on this policy?

**No comment**

Policy NBE7 Managing Flood Risk - What are your comments on this policy?

**No comment**

Policy NBE8 Water Quality, Supply and Efficiency - What are your comments on this policy?

**Is this happening in the regeneration areas?**

Policy NBE9 Water Quality Impact on the Solent International Sites - What are your comments on this policy?

**No comment**

Policy NBE10 Landscape - What are your comments on this policy?

**Agree with this policy.**

Policy NBE11 Gaps Between Settlements - What are your comments on this policy?

**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?

**Agree with Green and Blue Infrastructure policy**

Policy NBE13 Protection of Natural Resources - What are your comments on this policy?

**Agree with this policy.**

Policy NBE14 Historic Environment - What are your comments on this policy?

**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

**No further comment**

Chapter 6 Creating Desirable Places - How do you feel about this chapter?

Policy DES1 Well-Designed Places - What are your comments on this policy?

**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?

**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?

**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?

**No comment**

Chapter 6 Creating Desirable Places - Please provide any further comments on this chapter

**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?

**Satisfied**

Policy HWC1 Enabling Communities to Live Well - What are your comments on this policy?

**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

**No further comment**

Chapter 8 Delivering Green Connections - How do you feel about this chapter?

**Dissatisfied**

Policy DGC2 Sustainable Transport - What are your comments on this policy?

**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?

**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?

**Satisfied, no further comment.**

Policy DGC5 Provision and Enhancement of Open Space, Sport and Recreation - What are your comments on this policy?

**Overall satisfied however facilities such as sports halls for public use should be ringfenced for East Hampshire residents and not neighbouring district/counties. An example is that a sports team from a neighbouring district has block booked facilities for a long time depriving East Hampshire residents the use of this facility.**

Chapter 8 Delivering Green Connections - Please provide any further comments on this chapter

**No further comment.**

Chapter 9 Homes for All - How do you feel about this chapter?

**Satisfied**

Policy H1 Housing Strategy - What are your comments on this policy?

**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?

**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?

**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?

**No comment**

Policy H5 Specialist Housing - What are your comments on this policy?

**Should be enhanced with more specialist retirement facilities and nursing homes required.**

Policy H6 Park Home Living - What are your comments on this policy?

**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?

**No comment**

Policy H8 Safeguarding Land for Gypsy, Traveller and Travelling Showpeople Accommodation - What are your comments on this policy?

**No comment**

Chapter 9 Homes for All - Please provide any further comments on this chapter

**No further comment**

Chapter 10 Supporting the Local Economy - How do you feel about this chapter?

**Satisfied**

Policy E1 Planning for Economic Development - What are your comments on this policy?

**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?

**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?

**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?

**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?

**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

**No further comment**

Chapter 11 Development Management Policies - How do you feel about this chapter?

**Satisfied**

Policy DM1 The Local Ecological Network - What are your comments on this policy?

**No comment**

Policy DM2 Trees, Hedgerows and Woodland - What are your comments on this policy?

**No comment**

Policy DM3 Conservation Areas - What are your comments on this policy?

**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?

**Happy with this policy.**

Policy DM5 Advertisements affecting Heritage Assets - What are your comments on this policy?

**Satisfied**

Policy DM6 Shopfronts affecting Heritage Assets - What are your comments on this policy?

**No comment**

Policy DM7 Archaeology and Ancient Monuments - What are your comments on this policy?

**Agree with the policy**

Policy DM8 Historic Landscapes, Parks and Gardens - What are your comments on this policy?

**Agree with the policy**

Policy DM9 Enabling Development - What are your comments on this policy?

**Agree with the policy**

Policy DM10 Locally Important and Non-designated Heritage Assets - What are your comments on this policy?

**Agree with the policy**

Policy DM11 Amenity - What are your comments on this policy?

**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?

**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?

**Agree with this policy**

Policy DM14 Public Art - What are your comments on this policy?

**No comment**

Policy DM15 Communications Infrastructure - What are your comments on this policy?

**Agree with this policy**

Policy DM16 Self-build and Custom Housebuilding - What are your comments on this policy?

**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?

**No comment**

Policy DM18 Residential Extensions and Annexes - What are your comments on this policy?

**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?

**Agree**

Policy DM20 Rural Worker Dwellings - What are your comments on this policy?

**Agree with this policy**

Policy DM21 Farm & Forestry Development and Diversification - What are your comments on this policy?

**Agree with this policy**

Policy DM22 Equestrian and Stabling Development - What are your comments on this policy?

**No comment**

Policy DM23 Shopping and Town Centre Uses - What are your comments on this policy?

**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?

**No comment**

Chapter 11 Development Management Policies - Please provide any further comments on this chapter

**No further comment.**

Introduction to the Sites

**Satisfied**

Alt 8 Land at Neatham Manor Farm

**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**

The North-East Whitehill and Bordon

**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.**

OF1 Is there anything else you would like to tell us about this consultation?

**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.**

Yours F

**For and On Behalf of Whitehill & Bordon Community Party**

The Whitehill & Bordon Community Party is registered with the Electoral Commission as a political party in Great Britain to field candidates in England and full details can be viewed here:

<http://search.electoralcommission.org.uk/English/Registrations/PP12702> .



**From:** [REDACTED]  
**Sent:** 08 March 2024 16:46  
**To:** [EHDC - Local Plan](#)  
**Subject:** Woodland Trust - East Hants Draft Local Plan 2021-2040  
**Attachments:** [East Hants Plan Reg 18pt2 response - Woodland Trust March 2024.pdf](#)

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**Follow Up Flag:** Follow up  
**Flag Status:** Completed

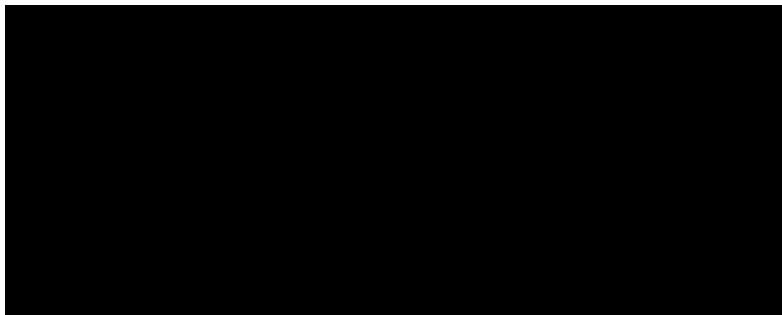
**Categories:** Consultation Responses

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

Please find attached a response from the Woodland Trust.

We welcome the opportunity to contribute to the development of the East Hampshire Local Plan and would be happy to meet to discuss further any of the issues raised in our response.

Best wishes,



The Woodland Trust, [REDACTED]  
[REDACTED]  
[woodlandtrust.org.uk](http://woodlandtrust.org.uk)



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<http://www.woodlandtrust.org.uk>

### **East Hants Draft Local Plan 2021-2040 (Regulation 18): response from the Woodland Trust.**

The Woodland Trust is the UK's leading woodland conservation charity: we want to see a UK that is rich in native woods and trees, for people and wildlife. We aim to achieve this by restoring and improving woodland biodiversity and increasing people's understanding and enjoyment of woods and trees.

We own over 1,275 sites across the UK, including Home Farm, Burkham Bentworth and Binswood, East Worldham. We are also partners in the Hampshire Forest Partnership. The Trust is recognised as a national authority on woods and trees, and a protector of the benefits and value that they deliver for climate, nature, and society.

The Trust campaigns with the support of local communities, to prevent any further destruction of ancient woods and veteran trees. We are an evidence-led organisation, using existing policy and our conservation and planning expertise to assess the impacts of development on these irreplaceable woodland habitats.

We support the opportunity to comment on the East Hants Draft Local Plan 2021-2040.

#### **Policy CLIM1: Tackling the Climate Emergency**

We support this policy, particularly the final point *Buildings and open spaces will be designed to maximise their resilience to extreme weather, whilst offering nature-based solutions to a changing climate*. The climate crisis is paralleled by a nature crisis and we need solutions that will tackle both. Trees make a valuable contribution to carbon sequestration and climate resilience. The Woodland Trust supports the CCC's recommended increase in UK woodland cover from its current 13% of land area to at least 19% by 2050 to tackle the biodiversity and climate crises, including by setting a canopy cover target in the local plan. More information can be found in the Trust's 2020 publication *The Emergency Tree Plan*.

#### **Policy CLIM5: Climate Resilience**

We support the inclusion of nature-based solutions in this policy point CLIM5.2

*b. The inclusion of green and blue infrastructure that introduce or augment natural features to provide substantial areas of shade, shelter and cooling within the development and (where appropriate) on its boundaries. New green infrastructure should provide a mix of species that are resilient to pests, diseases and changes in growing conditions associated with climate change.*

We recommend amending this to read *"b. The inclusion of green and blue infrastructure, that introduce or augment natural features, **including trees and hedgerows,**..."* Trees and hedgerows help mitigate the impacts of climate change, delivering natural cooling in urban

heat islands through transpiration as well as providing shelter and shade, and contributing to sustainable urban drainage systems. They also make a valuable contribution to the quality of the public realm, helping reduce air, noise and light pollution and improve people's mental health.

We recommend linking this to policies NBE12.1 and DM2 which also support new tree planting, setting a target for tree canopy cover in the appropriate policy within the plan, to be pursued through the retention of important trees, appropriate replacement of trees lost through development, ageing or disease and by new planting to support green infrastructure.

We support the reference to *"provide a mix of species"* as better for biodiversity and resilience than a mono-culture. Specifying native species from UK sourced & grown tree stock will help address threats of pests & disease and help boost resilience and biosecurity as well as supporting the domestic green economy and reducing the carbon footprint of the supply chain, and reflect the support for native species in para 4.75 and draft policy DES1e. We therefore propose amending the wording to read: *"New green infrastructure should provide a mix of native species, from local or UK sourced and grown stock, that are resilient to pests..."*

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

We support this policy, in particular reference in 2.1b) to protecting priority habitat types and irreplaceable habitats.

We note the wording in 2.1c) on meeting the statutory minimum requirements for 10% Biodiversity Net Gain (BNG).

We recommend setting a greater than 10% target for net gain for all or for major sites. By setting a more ambitious target, the Local Plan increases the chances that an average net gain of at least 10% will be delivered across the Plan area, given the possibility that some sites may not be able to deliver net gain within the District or that initiatives intended to deliver such gain may fall short in practice.

Councils across the South East are recognising that high housing values in combination with intense development pressure makes setting a 20% minimum BNG viable. Kent County Council has produced evidence to support this.

Recent examples include

- the Worthing Local Plan (adopted March 2023): *"Where it is achievable, a 20%+ onsite net gain is encouraged and is required for development on previously developed sites."*
- the Guildford Local Plan DM policies (adopted March 2023): *"a minimum 20% biodiversity net gain will be required within the Borough using the national biodiversity net gain calculation methodology. This higher level is justified because Surrey has suffered a severe biodiversity decline which is significantly worse than the country as a whole, opportunities to deliver this off-site if necessary are likely to be available locally and the viability of development is unlikely to be unduly impacted in most cases"*.

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

As drafted, this policy is in line with national guidance. As noted above, we recommend setting a greater than 10% minimum BNG requirement.

We also suggest adding reference to the Urban Greening Factor here (already included in draft policy NEB12) as a requirement for smaller, for more urban or brownfield sites: such sites may

already have a very low level of biodiversity and therefore a percentage increase may not in practice deliver significant enhancements.

We support the reference to local nature recovery in point d. Where net gain is delivered offsite, it should be part of a comprehensive Nature Recovery Network approach that includes conservation of existing habitats, including ancient woodland, and creation of new woodland to support habitat connectivity.

**Policy NBE7: Managing Flood Risk**

We suggest adding wording at the end of point 1d “and natural flood management” in line with NPPF para 167c).

We support policy in point 7.4 that SuDS should also seek to increase biodiversity and provide amenity benefits, such as additional public open space.

Woods and trees should form an integral part of all Sustainable Urban Drainage Systems (SUDS). Planting trees as part of sustainable drainage schemes (SuDS) can slow the flow of water and reduce surface water runoff by up to 62% compared to asphalt: tree roots help the infiltration of water into the soil, lowering the risk of surface water flooding.

**Policy NBE12: Green and Blue Infrastructure**

We support this policy, in particular point c requiring protection and expansion of tree canopy cover, support for tree-lined streets and for species selection.

We recommend linking this to policies CLIM5 and DM2 which also support new tree planting. We recommend setting a target for tree canopy cover in the appropriate policy within the plan, to be pursued through the retention of important trees, appropriate replacement of trees lost through development, ageing or disease and by new planting to support green infrastructure.

Specifying native species from UK sourced & grown tree stock is important to address threats of pests & disease, support nature recovery and boost resilience and biosecurity, and would complement para 4.75 and draft policy DES1e. We therefore propose amending the wording to read: *“location and species of new trees with regards to biodiversity, connectivity, biosecurity, provenance, climate change, and adaption.”*

**Policy DES1: Well-Designed Places**

We support this policy, particularly point e on supporting recovery of native habitats and native species.

Integrating trees and green spaces into developments early on in the design process minimises costs and maximises the environmental, social and economic benefits that they can provide. We recommend the guidance published by the Woodland Trust *Residential developments and trees - the importance of trees and green spaces* (January 2019) and associated guidance from the Trees & Design Action Group (TDAG).

**Policy DM2: Trees, hedgerows and woodland**

We support this detailed and robust policy to protect trees, hedgerows and woodland.

In particular, we support policy for new tree planting in points 2.1b, c and f; for tree protection in points 2.1d, e and g; presumption for retention in 2.2 and para11.18; and protection for ancient woodland and ancient & veteran trees in 2.3 and para11.13.

We recommend linking this policy to policies CLIM5 and DM2 which also support new tree planting. We recommend setting a target for tree canopy cover, to be pursued through the retention of important trees, appropriate replacement of trees lost through development, ageing or disease and by new planting to support green infrastructure.

This could be achieved by amending 2.1b add “to maintain and increase the District’s tree canopy cover, to a minimum average of 20%”

We welcome the guidance in para 11.13 that 50m buffers may be required for some developments adjacent to ancient woodland, and that surveys should be undertaken for smaller unmapped areas of ancient woodland. We suggest adding reference to buffers to the policy, by amending 2.1e add “and provides adequate buffers to protect these irreplaceable habitats”

The Ancient Tree Inventory (ATI) for the area may be incomplete. We therefore recommend an exercise to complete the ATI (which lists ancient, veteran and notable trees outside woods) across any sites allocated or proposed to be allocated for development, in order to comply with the requirements of the NPPF (paragraph 186c) for the protection of irreplaceable habitats.

We recommend reflecting draft policy DES1 by adding new 2.1h “maximises the use of appropriate native species from local or UK sourced and grown stock, to enhance biodiversity and biosecurity”.

#### **Policy DM13: Air quality**

We support this policy in particular 13.1c and para 11.87, which recognise the value of green infrastructure in enhancing air quality.

#### **Site allocations**

The Woodland Trust objects to ancient woodland areas being included in sites allocated as suitable for development.

We ask that surveys for unmapped areas of ancient woodland, and for individual ancient, veteran and notable trees outside woods be required across all and any sites allocated or proposed to be allocated for development, in order to comply with the requirements of the NPPF for the protection of irreplaceable habitats.

Where sites are adjacent to ancient woodland, we recommend a precautionary 50m buffer unless the applicant can demonstrate that a smaller buffer would suffice. Further information can be found in the Trust’s *Planners’ Manual for Ancient Woodland*, and the Natural England and Forestry Commission standing advice for ancient woodland, ancient trees and veteran trees.

#### **ALT1 Land at Brick Kiln Lane, Alton**

We note the adjacent area of ancient woodland, Hungry Copse 6.424 Ha at grid ref SU70033937. Should this site be allocated, we ask that the presence of ancient woodland be noted in the constraints and that appropriate buffers are specified.

#### **ALT2 Chawton Park Surgery**

There are significant numbers of trees on site, including some protected trees, and ask for a full tree survey with a policy presumption for tree retention.

**ALT4 Land at Whitedown Lane, Alton**

The site is adjacent to an area of ancient woodland on the southern boundary, Alexandra Wood 18.042 Ha at grid ref SU702385. Should this site be allocated, we ask that the presence of ancient woodland be noted in the constraints and that appropriate buffers are specified.

**ALT5 Land at Travis Perkins (Mounters Lodge part)**

There are significant numbers of trees on site, including some protected trees, and ask for a full tree survey with a policy presumption for tree retention.

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

The site is adjacent to an area of ancient woodland on the SE boundary, Monk Wood 11.986 Ha at grid ref SU740392. Should this site be allocated, we ask that the presence of ancient woodland be noted in the constraints and that appropriate buffers are specified.

**CTN2 Land at the Dairy**

The site north west boundary is adjacent to ancient woodland Holt Pound 56.238 Ha at grid reference SU811438. Should this site be allocated, we ask that the presence of ancient woodland be noted in the constraints and that appropriate buffers are specified.

**HDN1 Land at Woodcroft Farm**

The site is adjacent to an area of ancient woodland on the NE Boundary, James's Copse 5.285 Ha at grid ref SU683123. Should this site be allocated, we ask that the presence of ancient woodland be noted in the constraints and that appropriate buffers are specified.

**HDN3 Land north of Chalk Hill Road**

The site is adjacent to an area of ancient woodland on East & South East boundary 1.98 Ha at grid ref. SU704137. Should this site be allocated, we ask that the presence of ancient woodland be noted in the constraints and that appropriate buffers are specified.

**HOP1 Land north of Fullers Road, Holt Pound**

There is a Notable tree on the boundary of the site (ATI Ref No 212770). Should this site be allocated, we ask that the presence of this important tree be noted in the constraints and that appropriate root protections are specified.

**LIP1 Land north of Haslemere Road, Liphook**

There are significant numbers of trees on site, including some protected trees, and ask for a full tree survey with a policy presumption for tree retention.

**RLC3 Land at Oaklands House**

The site is adjacent to an area of ancient woodland on the NE boundary Oaklands Wood 1.382 Ha at grid ref SU730098. Should this site be allocated, we ask that the presence of ancient woodland be noted in the constraints and that appropriate buffers are specified.

**W&B7 Land at Hollywater Road and Mill Chase Road**

The site is adjacent to an area of ancient woodland on the SSW boundary, Eveley Wood 9.248 Ha at grid ref SU807348. Should this site be allocated, we ask that the presence of ancient woodland be noted in the constraints and that appropriate buffers are specified.







