

## East Hampshire Local Plan 2021 – 2040 Consultation

### Representations on behalf of 6A Vision Homes

#### Policy S2 – Settlement Hierarchy

We **support** the identification of Catherington as a Tier 4 settlement, helping to deliver the scale of housing development across the district at the same time as helping meet local housing needs and supporting the local community.

#### H1 – Housing Strategy

We **support** housing distribution set out in this policy which allows the delivery of a range of site sizes across the district, helping to support the communities of lower tier settlements whilst focussing the majority of housing in the larger, more sustainable settlements in the district. The proposed distribution would allow a range of site sizes to come forward which would support small to medium size local housebuilders and not just national volume housebuilders.

#### Policy CTN1 – Land at Parsonage Farm

We **support** the allocation of the site for housing.

We comment on draft policy CTN1 as follows:

1. The site has been subject to a planning application 59998 for the erection of 6 dwellings with associated access, car ports, parking and landscaping following demolition of an existing barn. This application has been subject to consultation and deemed acceptable by officers in respect of heritage, landscape, trees, ecology, drainage, highways and rights of way. This demonstrates that 6 dwellings are deliverable on the site whilst achieving a high quality of design and layout which would contribute to the character of the area.
2. The draft text indicates that there is potential for adverse landscape and visual impacts due to the position of the site in close proximity to the South Downs National Park and the Catherington conservation area. The planning application demonstrates that the development of this site could be carried without harmful impacts on the landscape setting of the SDNP whilst preserving the character and appearance of the Catherington conservation area.
3. The land is available immediately for development.

**From:** [REDACTED]  
**Sent:** 07 March 2024 14:50  
**To:** [EHDC - Local Plan](#)  
**Subject:** Local Plan Consultation - Regulation 18 (Part 2)  
**Attachments:** [Beech Hill Road - Regulation 18 Consultation - March 2024 .pdf](#)

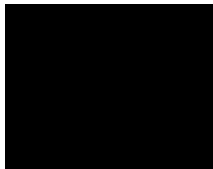
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**Categories:** Consultation Responses

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

Dear Sir / Madam

I attach representations for the draft local plan on behalf of my client PLP regarding their land interests in Headley



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



[www.carbonneutralbritain.org](http://www.carbonneutralbritain.org)

In 2024, ABC will be supporting Dose of Nature as its chosen Charity of the Year. The Charity works with people with mental health problems by encouraging them to connect with nature in order to improve their mental wellbeing.

<https://www.doseofnature.org.uk>

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

4 March 2024

Dear Sir / Madam,

**East Hampshire Draft Local Plan 2021-2040 Regulation 18 Consultation  
Beech Hill Road, Headley Down**

I write in response to the consultation on the draft Local Plan 2021-2040 for East Hampshire Council (EHDC) under regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

These representations are made on behalf of PLP Limited in relation to the Land at Beech Hill Road, Headley Down (The Site). Representations were previously made during the previous regulation 18 consultation in March 2019 by PRP, Andrew Black Consulting is now representing PLP who has an interest in the site.

**Site Context**

The Site extends to roughly 1.7 hectares on the south side of Beech Hill Road in Headley. It is formed of a single open field with vegetation on all sides. Residential development exists on all sides of the Site which is directly adjacent to the settlement boundary of Headley. The Site is also located within the 'Development in the countryside' and 'Gaps between settlements' policies from the 2014 Joint Core Strategy.

The services of Headley Down such as the Post Office, village hall, local convenience store and car servicing garage are in close proximity to the Site. Further, the Site is only a short walk to the nearest bus stop with services to Haslemere, Grayshott, Liphook, Aldershot and Holybourne. The services of Headley including the primary school and doctors' surgery are also within easy reach of the Site. It is therefore considered that this Site is in a sustainable location for residential development.

An updated Land Availability Assessment was produced in November 2023 and provides part of the evidence base for the Local Plan. This lists the site in Appendix A as deliverable for 7 dwellings in the first five years of the plan period. The Interactive Map states that the site is deliverable.

The previous version of the LAA assessed the Site during the previous regulation 18 consultation in March 2019 provided the following commentary on potential development of the land:

*The site provides the opportunity for new residential development adjacent to the settlement of Headley. The site is well bounded which helps mitigate urbanising influences on the rural feel of the wider area, and reduce or avoid visual impacts from the public highway. Whilst development would have an impact on the intrinsic character of the countryside, this is considered limited due to the established screening and setting provided by the tree boundaries, with the benefit of new homes close to services and facilities in Headley Down.*

### **Proposed Development of the Site**

A detailed layout has been prepared for the Site and is attached with these representations. This indicates that there is capacity for up to 36 houses comprising a mix of two, three and four bedroom properties alongside a 70 bed care home, of 34,500ft<sup>2</sup>. The layout indicates how existing landscaping can be retained around the perimeter of the Site to mitigate the impact of the development on immediate and long range views.

A street scene has been prepared demonstrating how the proposed houses along Beech Hill Drive would be in proportion to the existing properties along this road.

Further information and additional surveys can be produced in advance of examination and we would invite officers to visit the Site with the plans to assess how this Site can be developed in a sensitive way which compliments its setting and takes full advantage of the opportunities presented by the Site.

### **Omission from spatial strategy**

The site has been considered within the Integrated Impact Assessment (January 2024). The findings of the SA appraisal have been set out in the appendix of these representations.

The Site is reference as HEA-013 within the SA. The council assessed the Site as being well-bounded which helps mitigate urbanising influences with limited impact on character of countryside. EHDC acknowledges that the Site is close to the services and facilities in Headley Down, is sustainably located and is a logical extension to the settlement with strong defensible boundaries.

Within appendix V of the the previous SA for regulation 18 (Alternatives Appraisal), it stated that [emphasis added]:

*...there could be potential for development at site HEA-013 to result in a perceptual narrowing of the gap, or even coalescence, between Headley Down and Arford. This could be harmful in townscape terms as it is important to preserve and enhance the distinctive identities of the District's settlements, where possible. However, given the low density of surrounding development and the notable level of tree cover elsewhere between Headley Down and Arford, **it is considered that mitigation would be possible to prevent perceptual coalescence.***

It is clear that there is strong evidence contained within the LAA and previous SA to demonstrate that there would be minimal impact in terms of actual or perceived coalescence and any impact could be mitigated. It is therefore clear that this Site should not have been removed from the preferred approach and should instead be allocated for development.

Within the Landscape Capacity Study which forms part of the evidence base for the Local Plan the Site is within the area covered under figure 9b.2 Ludshott Common to Grayshott Greens and Hills. This area is a significant study area and there is no mention of a gap between Headley Down/Headley.

The Site can be seen in photo 1 of this section and the notes accompanying the assessment state that there is a significant amount of tree cover between the settlements which would prevent coalescence. It is therefore considered that there is potential for development in this area so long as there is mitigation from a landscape and visual impact viewpoint.

Overall, the conclusions of the Integrated Impact Assessment are considered to be erroneous and the decision to not allocate the site for development is not justified.

As a result, the draft local plan has failed to properly consider deliverable sites which can meet housing need in the early part of the plan period. As a result, the draft local plan would not comply with the tests of soundness as set out in paragraph 35 of the NPPF.

We would welcome the opportunity for further discussion with the council ahead of the next steps of the local plan process in respect of the inclusion of the site within future versions of the local plan.

Yours Sincerely



**Review of High Level Assessment Site Report**  
**Site Ref: LAA/HEA-013**  
**Site Name: Land at Beech Hill Road**

SA Objective		Overall Score	Comments
<b>Objective 1</b>	<b>To protect, enhance and restore biodiversity across the East Hampshire planning area</b>	0	<b>The scoring within the SA is supported</b>
1.1	Number of international ecological designations directly impacted by the site (SAC and SPA)	0	
1.2	Number of international ecological designations indirectly impacted by the site (SAC and SPA)	0	
1.3	Number of national ecological designations directly impacted by the site (SSSI, NNR and Ancient Woodland)	0	
1.4	Number of national ecological designations indirectly impacted by the site (SSSI, NNR and Ancient Woodland)	0	
1.5	Number of local ecological designations directly impacted by the site (SINC, LNR and Priority Habitat)	0	
1.6	Number of non-statutory network opportunity areas wholly or partially within site boundary	0	
1.7	Number of areas of additional green infrastructure within 50m of the site (National Forest Inventory Woodland England)	0	
<b>Objective 2</b>	<b>To minimise carbon emissions and contribute to achieving net zero carbon emissions in the East Hampshire planning area</b>	++	<b>The scoring within the SA is supported</b>
2.1	Site accessibility score (taken from the Ridge Accessibility Study)	15	

2.2	Average broadband download speed available within the site	>30mb ps	
2.3	Site falls wholly or partially within technical opportunity area for solar or wind energy (as defined by 2018 LUC Renewable and Low Carbon Study)	1	
2.4	Current land cover type and resulting emissions from land conversion to settlement	Trees-High	
<b>Objective 3</b>	<b>To promote adaptation and resilience to climate change</b>	<b>0</b>	<b>The scoring within the SA is supported</b>
3.1	Number of classifications of flood zone (flood zone 2 or 3) wholly or partially within the site	0	
3.2	Rating of "Groundwater Flooding Potential Areas" wholly or partially within the site	A	
<b>Objective 4</b>	<b>To promote accessibility and create well integrated communities</b>	<b>+</b>	<b>The scoring within the SA is supported</b>
4.1	Accessibility score of the site (Ridge Accessibility Study)	15	
4.2	Does the site fall within the most deprived areas in the East Hampshire planning area?	No	
<b>Objective 5</b>	<b>To actively promote health and wellbeing across East Hampshire and create safe communities free from crime</b>	<b>+/-</b>	<b>The scoring within the SA is supported</b>
5.1	Number of existing areas of publicly accessible open spaces within 800 m	7	
5.2	Caring accessibility score of the site (Ridge Accessibility Study)	0.5	
5.3	Does the site fall within the most deprived areas in the East Hampshire planning area?	No	
<b>Objective 6</b>	<b>To strengthen the local economy and provide accessible jobs and skills development opportunities for local residents</b>	<b>0</b>	<b>The scoring within the SA is supported</b>
6.1	Number of existing employment sites within 1,500 m of the site	0	

6.2	Number of town centres within 1,500 m of the site	0	<b>The scoring within the SA is supported</b>
6.3	Does the site fall within the most deprived areas in the East Hampshire planning area?	No	
<b>Objective 7</b>	<b>To protect and enhance built and cultural heritage assets in the East Hampshire planning area</b>	<b>0</b>	
7.1	Number of nationally designated heritage features directly impacted by the site (listed buildings, registered parks and gardens, battlefields and scheduled monuments)	0	
7.2	Number of nationally designated heritage features indirectly impacted by the site (listed buildings, registered parks and gardens, battlefields and scheduled monuments)	0	
7.3	Number of locally designated heritage assets directly impacted by the site (historic parklands and conservation areas)	0	
7.4	Number of locally designated heritage assets indirectly impacted by the site (historic parklands and conservation areas)	0	
7.5	Number of heritage at risk features directly or indirectly impacted by the site	0	
7.6	Number of Hampshire County Council archaeology alerts wholly or partially within the site boundary	0	
7.7	Number of Hampshire County Council archaeology alerts buffer zones wholly or partially within the site boundary?	0	
<b>Objective 8</b>	<b>To provide good quality and sustainable housing for all</b>	<b>+</b>	<b>The scoring within the SA is supported</b>
8.1	Residential yield	7	<b>The comments of the Landscape Capacity Study cover a very broad area and are not specific to this site. It is considered that any landscape impact would be limited to very localised effects and can be mitigated through the landscape design of the development. This would result in negligible impact on landscape and townscape.</b>
<b>Objective 9</b>	<b>To conserve and enhance the character of the landscape and townscape</b>	<b>--</b>	
9.1	Landscape capacity score of the site	Low	
9.2	Number of AONBs or National Parks within 2km of the site	0	



<b>Objective 10</b>	<b>To support efficient and the sustainable use of East Hampshire's natural resources</b>	--	The site is used as paddock and would not result in loss of agricultural land. The impact on SPZ could be mitigated. This would result in the overall impact being negligible
10.1	ALC provisional OR post-1988 Grades 1, 2, 3, or 4 wholly or partially within site boundary	1	
10.2	Number of Source Protection Zones (SPZ) wholly or partially within the site boundary	1	
10.3	Number of historic landfills wholly or partially within the site boundary presenting opportunities for remediation	0	
10.4	Number of mineral designations wholly or partially within the site boundary, including mineral resource areas, mineral safeguarding areas and mineral consultation areas	0	
<b>Objective 11</b>	<b>To achieve sustainable water resource management and protect and improve water quality in the East Hampshire planning area</b>	-	The site is not within a fluvial flood zone or ground water flooding area so it is unclear how this score was arrived at. The SPZ can be mitigated. This would result in the overall impact being negligible
11.1	Number of classifications of flood risk (flood zone 2 or 3, or Groundwater Flooding Potential Areas) wholly or partially within the site	1	
11.2	Number of Source Protection Zones (SPZ) wholly or partially within the site boundary	1	

<b>Objective 12</b>	<b>To minimise air, noise and light pollution in the East Hampshire planning area</b>	<b>0</b>	<b>The scoring within the SA is supported</b>
12.1	Number of sources of noise, air and light pollution within 150 m of the site	0	



Beech Hill Drive, Headley Down  
Coloured Site Layout

**19072 / C101**

Scale 1:1000 @ A3 March 2019



Plot 19. Plot 18. Plot 17. Plot 16. Plot 15. Plot 14. Plot 6. Plot 5. Plot 4. Plot 3. Plot 2. Plot 1.

BEECH HILL DRIVE



Beech Hill Drive, Headley Down  
Coloured Street Scene

**19072 / C102**

Scale 1:500 @ A1 March 2019

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29<sup>th</sup> February 2024

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East Hampshire District Council  
Local Plan Team

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



Dear Local Plan Team,

### **EHDC LOCAL PLAN (LP) REGULATION 18 CONSULTATION**

We are instructed by Defence Infrastructure Organisation (DIO) and the Whitehill & Bordon Regeneration Company (WBRC) to submit comments in relation to the current EHDC LP Regulation 18 consultation stage.

As you will be aware, the delivery of one of the UKs largest regeneration projects at Prince Philip Park (PPP) in Whitehill & Bordon is well under away and continues to be delivered at pace.

The principle of the sustainable expansion of Whitehill & Bordon (W&B) in the Reg 18 plan is fully supported by DIO/WBRC and represents a logical approach to providing additional housing and supporting uses in such a sustainable location. We believe Whitehill & Bordon is the most sustainable location for future growth in East Hampshire and as such would welcome further opportunities to present the case for growth.

Whilst we have significant reservations regarding the Reg 18 approach to the calculation and spatial distribution of new housing (particularly such a heavy reliance on windfall sites which we consider cannot reasonably be expected to come forward) our comments below are confined to policies in relation to Whitehill & Bordon, and associated housing and climate change polices that potentially (negatively) impact on the delivery of new housing there which puts future regeneration at risk.

#### **Whitehill & Bordon**

Accordingly the Reg 18 policies which allocate a further 477 dwellings (over and above the 2,400 dwellings already consented on PPP) in or adjacent to PPP (on DIO land) is supported albeit DIO/WBRC remain committed to bringing forward c. 1,300 dwellings in the longer term in W&B. In that context we were surprised to read that the previously promoted Gibbs Lane site (LAA ref WHI-021) has not performed relatively as well as other Reg allocated sites (as EHDC sets out in an Accessibility Study) given the extensive pedestrian/cycle networks in particular that this site would easily link into. Whilst

the approach taken to the Gibbs Land site by EHDC in this Study are flawed (the site is close to Reg 18 site W&B3 which scores well in this study as one example, DIO/WBRC will be undertaking further work to bring forward this site at the next Local Plan review stage to demonstrate our understanding that such sites are capable of delivering further housing with minimal constraints being able to be easily addressed/mitigated.

As a result of the Reg 18 plan allocating c. 820 dwellings fewer than DIO/WBRC has previously promoted/has land available to accommodate (i.e. c. 1,300 dwellings overall), there is not currently a need to provide the extensive/expansive green infrastructure network that has previously been promoted adjacent to PPP. We would welcome further discussion with you regarding the extent of GI/SANGS needed to support the Reg 18 allocations. However the proposed allocation of land at the Croft for use as SANGS continues to be supported by DIO/WBRC.

### **Whitehill & Bordon Site Allocations**

In respect of the proposed site allocation of W&B1 – Whitehill & Bordon Town Centre Intensification, under the 'Built form and townscape' section we would suggest that reference is included to there being mainly four storey development already being consented in part of this site, which should be seen as a minimum (if not at least five stories or more) for the proposed allocation in this town centre location, and we **object** to the current wording of the 'Built form and townscape' section.

Whilst there are further Reg 18 site allocations in W&B beyond PPP (not in DIO's ownership) i.e. sites W&B7 and W&B8 (totalling 170 dwellings) there is no evidence in the Reg 18 plan to suggest that these developments shouldn't contribute to the infrastructure requirements listed in Fig 12.10 in exactly the same way as sites W&B1 to W&B5 are currently expected to, and therefore we **object** to the proposed principle of the unfair/unreasonable apportionment in Figure 12.10. As we can not see that EHDC has justified the range of infrastructure requirements in Figure 12.10 such a lack of evidence is a further ground of **objection**.

### **Housing Policies**

Setting aside the viability of delivering 40% affordable housing in Whitehill & Bordon (given the significant costs of bringing forward previously developed land for example), Policy H3 sets out affordable housing requirements to deliver 40% affordable housing of which 70% is to be for affordable housing for rent (of which a minimum 25% should be social rent) and 30% to be other affordable home ownership products which are to be negotiated with EHDC. EHDC's approach to the latter 30% element is **welcomed** to give opportunities to explore different/evolving forms of the delivery of affordable housing products to respond to changing market conditions.

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

Firstly it is unclear if EHDC has taken account of a recent Ministerial Written Statement (MWS) on 13<sup>th</sup> December 2023, which can be found at: <https://questions-statements.parliament.uk/written-statements/detail/2023-12-13/hcws123> which states:

*“As a Government, we continue to make progress towards the net zero goal set out in legislation in 2019, including by improving the energy efficiency of homes and moving to cleaner technologies and sources of power within the homes and building sector.*

*There has been a long-standing debate within planning about both the best method and body to set energy efficiency and environmental standards. For a number of years, the plans of some*

local authorities have sought to go further than national standards in terms of such efficiency for new-build properties. Equally, there is a legitimate consideration for the Government to want to strike the best balance between making progress on improving the efficiency and performance of homes whilst still wanting to ensure housing is built in sufficient numbers to support those who wish to own or rent their own home.

In 2015, in reference to an uncommenced provision in the Deregulation Act 2015 which amended the Planning and Energy Act 2008, a written ministerial statement (WMS) (HC Deb, 25 March 2015, vol 584, cols 131-138WS) stated that until that amendment was commenced, local plan policies exceeding minimum energy efficiency standards should not go beyond level 4 of the Code for Sustainable Homes. Since then, the introduction of the 2021 Part L uplift to the Building Regulations set national minimum energy efficiency standards that are higher than those referenced in the 2015 WMS rendering it effectively moot. A further change to energy efficiency building regulations is planned for 2025 meaning that homes built to that standard will be net zero ready and should need no significant work to ensure that they have zero carbon emissions as the grid continue to decarbonise. Compared to varied local standards, these nationally applied standards provide much-needed clarity and consistency for businesses, large and small, to invest and prepare to build net-zero ready homes.

The improvement in standards already in force, alongside the ones which are due in 2025, demonstrates the Government's commitment to ensuring new properties have a much lower impact on the environment in the future. In this context, the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations. The proliferation of multiple, local standards by local authority area can add further costs to building new homes by adding complexity and undermining economies of scale. Any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned buildings regulation should be rejected at examination if they do 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).

Where plan policies go beyond current or planned building regulations, those policies should be applied flexibly to decisions on planning applications and appeals where the applicant can demonstrate that meeting the higher standards is not technically feasible, in relation to the availability of appropriate local energy infrastructure (for example adequate existing and planned grid connections) and access to adequate supply chains.

To be sound, local plans must be consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework and other statements of national planning policy, including this one.

The Secretary of State will closely monitor the implementation of the policy set out in this WMS and has intervention powers provided by Parliament that may be used in respect to policies in plans or development management decisions, in line with the relevant criteria for such intervention powers."

EHDC's Reg 18 policies going through to the Reg 19 stage must comply with the above MWS.

Off-setting will be essential to deliver development proposals in East Hampshire. This is not currently comprehensively explored in the Reg 18 policies, but something which could be used to support the retrofit of existing homes which make up the majority of existing emissions in the district. The Local Plan as a whole is adding a relatively low number of homes to the district in the next plan period so the Local Plan should be used as an enabler to lower emissions in existing homes through off-setting in my view.

Reg 18 policies include a degree monitoring and reporting but do not clearly state over what timeframe or what the method of reporting to the Council will be and requires **clarification**. Also, what the Council will do with the data and whom it will be available to requires **clarification**. Para 4.27 refers to a strategy for monitoring energy usage which is welcomed and is being undertaken at PPP in any event as a matter of course.

The climate changes policies cannot seek to go beyond the future homes standard as there is no legislative base to do so and not sufficient evidence base in the consultation document to support this to which we **object**. EHDC would need to provide more evidence that the Reg 18 approach is achievable/viable/deliverable across the district.

Para 4.26 refers to EHDCs potential preparation of a SPD for off-site renewable energy generation – the use of the word ‘may’ is **objected** to in this context and a more definitive planning policy position is needed from EHDC.

In respect of policy CLIM2, we **object** on the following grounds:

- It does not appear that EHDC has tested the policy requirements as feasible nor benchmarked against other developments which have been successfully delivered. Essentially is there a real-world example of when/where development has met the current Reg 18 policy requirements?
- CLIM2.1 b) - **clarification** is needed as to whether this policy apply to all units or can an average be taken across a development?
- CLIM2.1 c) – the policy requirements do not seem to technically feasible to deliver on all sites.
- CLIM2.1 d) – does this rule out a gas CHP coming forward in a decentralised energy centre to support residential development?

In respect of policy CLIM3, we **object** on the following grounds:

- The presumption against demolition will conflict against prioritising development on brownfield land. Whilst the policy requires Whole Life Carbon Assessment to be undertaken, the wording of this policy is not fit for purpose particularly as through other construction schemes contractors are required to re-use and recycle site won material. Such assessments are relatively expensive to prepare which EHDC doesn't seem to have given any consideration to in viability terms, particularly for the smaller development. The definition of significant planning benefits' is needed/to be **clarified** as for example the retention of buildings incapable of being viably/technically feasible for re-use may conflict with wider placemaking objectives for a site redevelopment if the buildings aren't located in a location to contribute to such objectives.
- The promotion of locally sourced materials is supported, but clarification is needed as to how 'local' is defined as we understand that East Hampshire does not currently produce much if any building materials.
- The UK does not manufacture any PV panels or ASHP, these are all produced abroad with some assembly required in the UK, but mainly these products are for distribution in the UK. The supply chain in the UK for construction is not established in a way which support locally sourced material so this would be unavailable in most cases. The majority of timber for



construction comes from abroad as the UK does not have a sustainable source of timber to meet industry demands. EHDC will have little or no influence in improving the local supply chain to deliver development to meet the policies as currently drafted.

- Para 4.42 – EHDC hasn't evidence why the use of Greater London Assembly guidance on whole life cycle carbon assessments is relevant to East Hampshire.

In respect of policy CLIM4, we **object** on the following grounds:

- It would be helpful for EHDC to provide an indication in the Local Plan where renewable and low carbon energy projects could be located as assessed against the constraints listed on page 73. It is unclear on the scale of energy projects EHDC would like to see coming forward and requires **clarification**.

In respect of policy CLIM5, we **object** on the following grounds:

- Whilst climate resilience is important issue, the delivery of resilient green infrastructure is at odds with the general policy of the Council to promote native planting schemes and requires **clarification**.

There is no information contained within the policies how the Council and their stakeholders will support the delivery of these policies through the development management planning process. Several Reg 18 policies are not East Hampshire specific with no commentary on what the key opportunities and constraints/implications are for the Local Plan - essentially these policies could apply anywhere which is **not a policy position which we support**.

It should also be **clearer** what EHDC's Local Plan can and can't achieve in tackling/addressing the challenges of climate change and the climate emergency the Council declared in 2019. The Local Plan policies suffer from the same problems as the Climate Change SPD in relation to talking about climate change in general terms with little focus on what it means for East Hampshire.

There are a number of references in the Reg 18 policies/supporting text to the need for developments to be supported by a Sustainability Statement, but is silent on the scope/format such statements EHDC will encourage to be taken, and requires **clarification**.

Finally, on the basis of a lack of evidence to show that EHDC has appropriately considered the cumulative financial impacts on bringing forward a wholly climate change policy compliant scheme (viability) then this represents a further ground of **objection**.

### **Conclusions**

We trust the above comments of support or objection to the Reg 18 policies will be taken into account going forward into the Reg 19 stage. We look forward to further discussions with you particularly in respect of green infrastructure matters in Whitehill & Bordon referenced in the Reg 18 plan, and to discuss the further matters we have suggested are ambiguous or lacking detail/evidence to support in the plan to provide clarification/reassurance about how EHDC intends to potentially take forward such policies in the Reg 19 plan.

Yours sincerely



Associate Director

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

Planning Policy  
East Hampshire District Council  
Penns Place  
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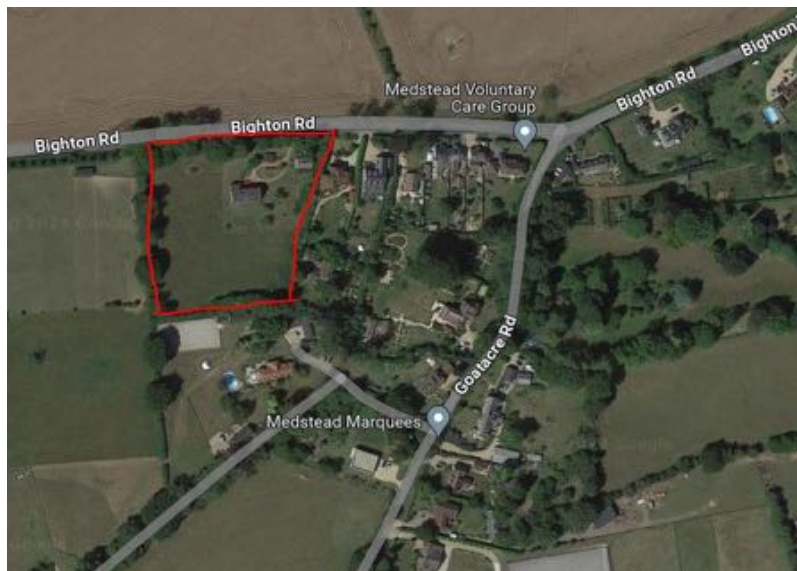
Our ref: 3980

**04 March 2024**

Dear Sir/Madam

**Draft Local Plan 2021-2040 (Regulation 18) – Representations. Casalinda, Medstead**

We write in response to the Council’s ongoing consultation on the “Draft Local Plan 2021-2040 (Regulation 18)” to provide our comments on specific behalf of [REDACTED] and with direct reference to the property known as Casalinda in Medstead – shown below from Google Earth®.



These comments, whilst instructed by specific client and with a specific site in mind are both generic (in terms of the reasoning for the consultation and its approach) but also tailored specifically to the individual clients’ needs to provide a working example of our suggested approach. We have, through other representations, already challenged the draft plan on the basis that the approach to windfall development is flawed and undermines the whole strategic approach of the local plan. We will not reiterate these points here, focusing instead on how some flexibility towards development in the countryside is needed



if the Council is to deliver its suggested housing number (or, as we suspect, respond to higher numbers of houses as the housing numbers are further examined).

There is a legal requirement<sup>1</sup> for the plan to reflect both national policies set out within the National Planning Policy Framework (NPPF) and associated National Planning Practice Guidance. Furthermore, whilst applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise<sup>2</sup>, the NPPF is also a material consideration in planning decisions.

In our opinion, the key to a successful and sound local plan is how it responds to the housing delivery requirements of the area. If this is correctly addressed, then the other requirements of the plan can fall in place behind this. Reflecting this objective the Draft Local Plan, at paragraph 3.4. recognises that significantly boosting the supply of homes is a key government objective (as set out at Paragraph 60 of the NPPF). To achieve this, the plan sets out that 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 planning permission is developed without unnecessary delay.

### **Housing delivery of the shortfall**

Given rural nature of the district, there is an obvious challenge to balance the need for new housing vs the need to protect the countryside. However, as the draft plan is currently drafted, there is a very one sided and negative approach to the delivery of houses in the countryside. This is contrary to the advice of paragraph 83 of the NPPF which positively and proactively identifies the need to help rural communities through the deliver of more housing:

- 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.**

Paragraph 84 of the NPPF is clear that planning policies should avoid *isolated* new houses in the countryside. Isolation is defined in the Braintree case of 2018<sup>3</sup> with the two important conclusions of the case being:

- “... a dwelling that is physically separate or remote from a settlement. Whether a proposed new dwelling is, or is not, ‘isolated’ in this sense will be a matter of fact and planning judgment for the decision-maker in the particular circumstances of the case in hand” at [31].
- “Whether, in a particular case, a group of dwellings constitutes a settlement, or a ‘village’, for the purposes of the policy will again be a matter of fact and planning judgment for the decision-maker” [32]

So, what is a settlement in this sense? The draft local plan endeavours to draw settlement boundaries around settlements (generally) or in the case of a sprawling village such as Medstead, pockets of development which make up the village. However, this is done on an ad hoq and inconsistent basis. As

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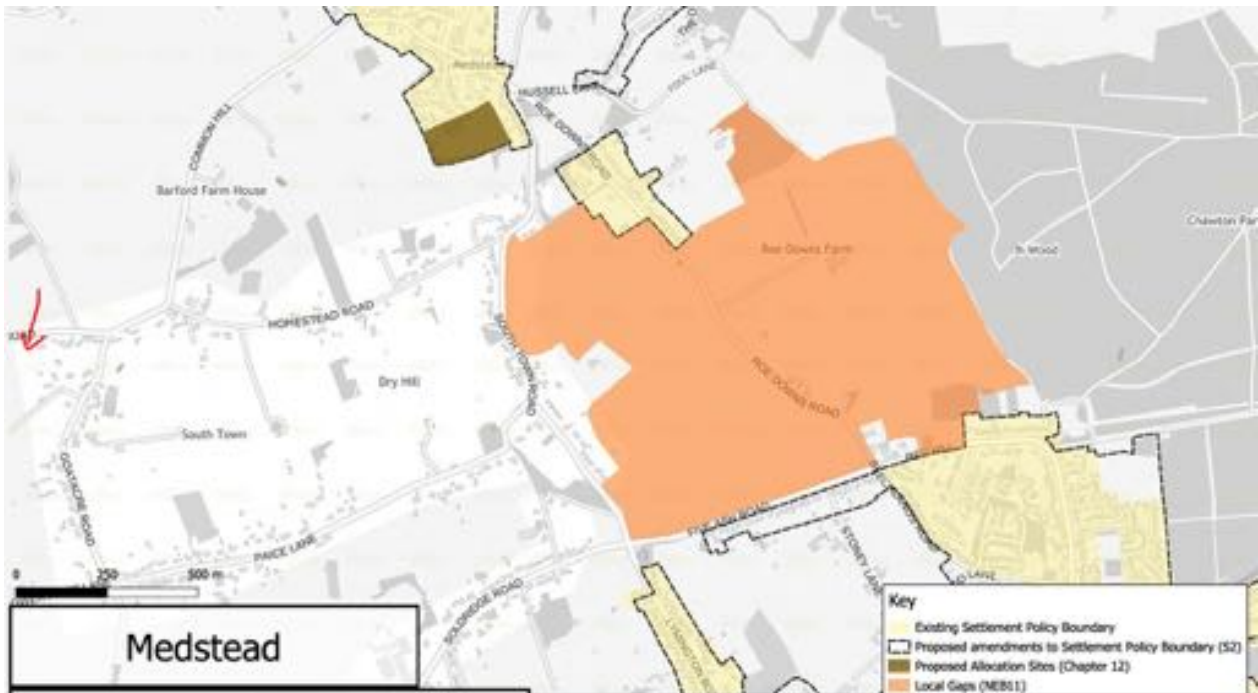
<sup>1</sup> Section 19, Subsection 2 of the Planning and Compulsory Purchase Act 2004

<sup>2</sup> Section 38(6) of the Planning and Compulsory Purchase Act 2004 and Section 70(2) of the Town and Country Planning Act 1990

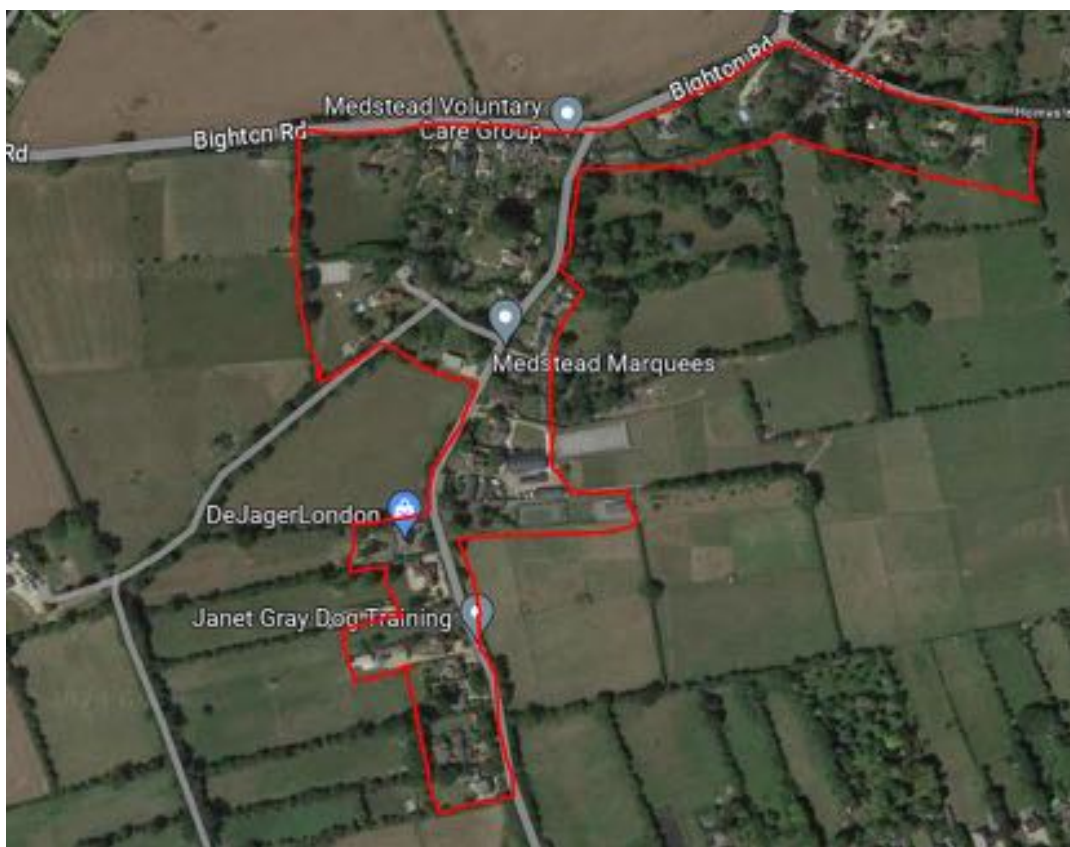
<sup>3</sup> Braintree DC v SSCLG [2018] EWCA Civ. 610



shown on the extract map from the draft plan below, the new plan intends to place more of the village into settlement boundaries, freeing them up for residential development. Why, then, has the western part of the village been ignored for a settlement boundary?



The pocket of development around Casalinda is no less dense than other pockets of development which benefit from a settlement boundary.





In fact, as shown on the suggested boundary (red line below) there is a continuous frontage of built up development of over 500m from north to south and 300 from east to west. Other than a single farm, all of the other development within this continuous boundary is residential and therefore, reflecting this prevailing characteristic, no additional residential development in this location would be out of character or harmful to the rural feel of the countryside. So why shouldn't it be suitable for additional development? On this basis, we suggest that an additional settlement boundary would be appropriate as shown above.

Should the Council insist on there being no settlement boundary around this part of Medstead then, as required by paragraph 83 of the NPPF, there should be more flexibility in the policies for land outside of settlement boundaries. We are not saying that there should be an open policy to new dwellings in the countryside but a policy which allows new residential development within clusters of development would be appropriate. For example, West Berkshire's Local Plan includes the policy below which would be appropriate here:

**In settlements in the countryside with no defined settlement boundary, limited infill development may be considered where:**

- i. It is within a closely knit cluster of 10 or more existing dwellings adjacent to, or fronting an existing highway; and
- ii. The scale of development consists of infilling a small undeveloped plot commensurate with the scale and character of existing dwellings within an otherwise built up frontage; and
- iii. It does not extend the existing frontage; and
- iv. The plot size and spacing between dwellings is similar to adjacent properties and respects the rural character and street scene of the locality.

The planning system should be proactive rather than restrictive and such a policy finds the balance between housing delivery, supporting rural communities and protecting the countryside.

We note the wording of policy S2.3 below which makes little sense.

**S2.3 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.

Either there is a presumption in favour of sustainable development within the SPB or there is not. It is not something that should be reviewed through further development plan documents and/or neighbourhood plans (the latter of which are, ironically, part of the development plan too). Both of these would be tested for consistency against this draft plan and therefore, if their approach was inconsistent, then the subsequent development plan document would not be sound in their approach. Whilst this wording may be interpreted as allowing more flexibility in the future, generally when planning policies are left for drafting at local level (Neighbourhood Plans, for example) they are less flexible and more aimed at preventing rather than delivering development.



The wording of S2.3 insinuates that the policies, as drafted, are not fit for purpose; effectively pushing the difficult decisions further down the line to other development documents which may or may not happen or to Neighbourhood Plans which, all evidence suggests, will be more negative towards development than positive. This is the time for the Council to be proactive in its approach and to stop stifling development,

### Conclusion

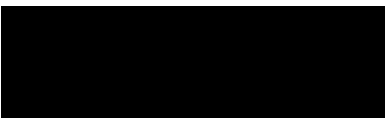
We have little doubt that the Draft Local Plan, as it is currently drafted, will not deliver the target number of dwellings not least because of the over ambitious and unrealistic reliance on windfall dwellings to be delivered. The draft plan fails to respond to the requirements of paragraph 83 of the NPPF and instead takes a negative and restrictive approach to development in the Countryside. Medstead is a unique settlement in East Hampshire because of its sprawling nature. This nature presents opportunities for enhancing the settlement and delivering more housing whilst still protecting the rural nature of the village.

We have presented the Council with two more positive approaches. Either there should be further settlement boundaries (as drafted above) or the new local plan should include a flexible policy for clusters of development in the countryside as per the West Berkshire example. Through either approach, a development such as the one shown below (in yellow) could be delivered (net gain of 4 houses with no harm to the countryside). Of course, this is a one-off scenario but several similar development would make a proactive and positive contribution towards the Council's housing requirements.



Should you wish to discuss any of the above, please contact the writer.

Yours faithfully  
**BELL CORNWELL LLP**



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

Our ref: 2617

**04 March 2024**

Dear Sir/Madam

**Draft Local Plan 2021-2040 (Regulation 18) – Representations. Cowdray Park, Mount Pleasant, Alton**

We write in response to the Council’s ongoing consultation on the “Draft Local Plan 2021-2040 (Regulation 18)” to provide our comments on specific behalf of Flavia Estates who are promoting the site shown below, accessed off Cowdray Park, for residential development. To aid your assessment of these representations, we include an illustrative masterplan and a Landscape Visual Assessment (albeit one prepared in the current context rather than the context of additional development which be being suggested for the wider area between Alton and the A31:





# **Landscape and Visual Appraisal**

For  
**'Land off Cowdray Park,  
Mount Pleasant  
Alton  
GU34 2TT**

**LAA Site Reference LAA/AL-004**

By  
Landscape Perspective Ltd

On behalf of Flavia Estates  
Date: March 2019

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## **APPENDICES (separate documents)**

Appendix 1: Part 1: Figures

Part 2: Views

Appendix 2: Methodology

# 1 Introduction

- 1.1 This Landscape and Visual Appraisal (herein referred to as the LVA) has been prepared by Landscape Perspective Ltd on behalf of Flavia Estates. It has been prepared as part of the public consultation process for the Draft Local Plan which is currently being reviewed. Once complete it will only cover the areas in East Hampshire outside the South Downs National Park and, once it has been adopted, it will replace the Joint Core Strategy (the Adopted Local Plan).
- 1.2 The site was included in the call for sites submission of the East Hampshire District Council Land Availability Assessment (LAA) December 2018 (site reference LAA/AL-004) which followed The 'Alton Study Final Report' (Urban Initiatives Studio for EHDC, June 2013) which provided supporting evidence for the EHDJCS and marked the first stage of a process that considered how Alton may develop in the future.
- 1.3 The Alton Study Final Report included the site within Growth Area 7, 'Borovere Farm and Windmill Hill', but as a result of an analysis of the characteristics of the site, did not include the site within its 3 three strategic approaches for growth and the provision of new homes in the town. *(Refer to Appendix 1 Part 1 Figure 16)*
- 1.4 The Land Availability Assessment of December 2018 *(Refer to Appendix 1 Part 1 Figure 3)* concluded that the site was undevelopable, as it was considered that:  
*'Whilst some identified constraints could potentially be overcome, this is not a suitable location for residential development, due to the rural character, landscape impact and openness of the site. The site would form an illogical extension into the countryside beyond the existing pattern of development and would have an adverse impact on the intrinsic character of the countryside.'*
- 1.5 Landscape Perspective have been instructed by Flavia Estates to carry out an independent landscape and visual assessment, to assess whether the conclusions of the LAA and those of the Alton Study Final Report can be challenged and whether there is scope for development and if the remaining constraints is justifiable. No scheme has been drawn to allow an assessment of that scheme against the baseline condition, therefore the assessment is based on a notion of feasibility at this stage, to establish if any development could occur without causing significant impacts.
- 1.6 This Appraisal has been prepared by a Chartered Member of the Landscape Institute and considers the potential effects of the proposed development upon:
  - Landscape elements and features such as vegetation and topography
  - Landscape character
  - Visual amenity
- 1.7 The main objectives of this appraisal are as follows:

- To identify, evaluate and describe the current landscape character of the site and its surroundings and also any notable individual landscape elements and features within the site.
- To determine the sensitivity of the landscape to the type of development proposed.
- To identify potential visual receptors (i.e. people who would be able to see the development) and evaluate their sensitivity to the type of changes proposed.
- To identify and describe any effects of the development in so far as they affect the landscape and/or views of it and to evaluate the magnitude of change due to these effects.

1.8 The landscape and visual appraisal has been undertaken in accordance with best practice. A detailed methodology is outlined at the end of this report.

### **Cumulative effects**

1.9 Cumulative effects generally occur where there may be simultaneous or sequential visibility of two or more developments of the same type and scale, or where the consideration of other schemes would increase an effect identified. Where other similar schemes are in the planning system and made known to the applicant, or are under construction, these should be considered in conjunction with the proposed scheme.

1.10 Planning consent has been granted and an element of construction commenced for a hybrid application on neighbouring land, i.e Land East of Selborne Road, Alton and the Former Lord Mayor Treloar Hospital.

1.11 At the time of producing this appraisal, the only construction that has commenced associated with this development is that of the infrastructure works at the Butts bridge railway. The works on the A339/B3004 junction at Butts Bridge include highway improvements, comprising a new road across the Chawton triangle to link Winchester Road to the first of two new roundabouts, needed to provide access to Borovere Farm, plus a replacement roundabout to serve both bridges, and the replacement of historic Butts Bridge with a wider steel railway bridge to facilitate improved traffic flow across the top of The Butts.

1.12 The landscape and visual impact of these works at Butts Bridge has not been taken into consideration in this report as there would not be any perceived cumulative effect given the distance of these works from the Cowdray Park site. However, for contextual reasons, the consented landscape masterplan of this developments has been included in Appendix 1 Part 1, (*Figure 18*) together with a photomontage taken from the EDP LVIA, at viewpoint 12, (*Figure 19*) which illustrates the estimated roof line at 8m above ground level along centre line of site, estimated tree height from their proposed structure planting south of the development, in 15 years (14.3) and again the estimated tree height in 25 years (18.3m) and this has been considered in the visual appraisal section in the light of potential cumulative effects.

## 2 Site description

- 2.1 The site lies adjacent to the current settlement policy boundary of Alton. *(Refer to site location plan Appendix 1 Part 1 Figure 1)* The site is almost square, and covers 2.5ha of undeveloped unimproved grassland (agricultural land) adjoining Borovere Farm (Business Park) which lies to the west. To the east of the site, separated by a hedgerow with trees, is a public open space owned and managed by Alton Council known as Windmill Hill, across which run a number of public footpaths. To the north of the site, the site is contained by the residential area known as the 'Ridgeway environs' (Alton Character Assessment' (Final, Autumn 2010), the site being accessed off a cul de sac called 'Cowdray Park'. To the south the land is arable farmland which continues south until it reaches the edge of the A31 highway. All boundaries are formed of native hedgerows with trees. *(refer to Appendix 1 Part 1 Figure 11 Aerial photograph and photographs 8-11, 15-19)*

## 3 The proposed development

- 3.1 No proposals have been put forward for this site, and therefore the conclusions and recommendations of this LVA can be used to inform any potential masterplan, including the siting, massing and design, which can include mitigation measures to mitigate against any potential landscape and visual impacts as part of an iterative process.

## 4 Planning policy

- 4.1 An appreciation of the significance, in landscape terms, of any development starts with an understanding of the context within which any such development is to be tested for its acceptability.
- 4.2 This appraisal has conducted a review of relevant planning policy and landscape designations. This review focuses on local planning policy, since such policy is more specific to the site and should reflect national advice regarding landscape issues contained within the National Planning Policy Framework (NPPF). The appraisal has also considered national planning policy guidance and legislation where appropriate.

### Local Planning Policy

- 4.3 The current (or 'Adopted') Local Plan was adopted in 2014 and covers the whole of the East Hampshire District, including those parts inside the South Downs National Park. It is called the Joint Core Strategy. The site lies adjacent to the current settlement policy boundary of Alton, but not within it, being constrained by policy CP19 'Development in the countryside' which covers a large area surrounding Alton. *(Refer to Appendix 1 Part 1 Figure 4)*

### CP19 Development in the countryside

- 4.4 This policy seeks to protect the countryside (the area outside of settlement policy boundaries). Key points from the policy include :

*'for the sake of its intrinsic character and beauty, the diversity and qualities of its landscapes, heritage and wildlife, the wealth of its natural resources and to ensure it may be enjoyed by all.'*

#### **CP20 Landscape**

4.5 Whilst not mentioned in the LAA as a constraint, it is also important to assess the site in relation to Policy CP20, Landscape which requires:

*'The special characteristics of the district's natural environment will be conserved and enhanced'*

and development must:

*'protect and enhance local distinctiveness sense of place and tranquillity by applying the principles set out in the district's Landscape Character Assessments, including the Community/Parish Landscape Character Assessments;'*

4.6 Policy CP20 also states that:

- *'Inappropriate types and scales of development will not be permitted in order to maintain the landscape character and quality of the countryside. The countryside will continue to be protected for its intrinsic value.'*
- *The special characteristics of the district's natural environment will be conserved and enhanced.*
- *New development will be required to protect and enhance settlements in the wider landscape, land at the urban edge and green corridors extending into settlements; incorporate appropriate new planting to enhance the landscape setting of the new development which uses local materials, native species and enhances biodiversity;*

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

4.7 The site is not within the SDNP boundary but the SDNP is within the study area, (Refer to Appendix 1 Part 1 Figure 12) and therefore Local Plan Policy CP20 above is of relevance to this appraisal, where it stipulates that new development is required to:

*a) conserve and enhance the natural beauty, tranquillity, wildlife and cultural heritage of the South Downs National Park and its setting, and promote the opportunities for the understanding and enjoyment of its special qualities, and be in accordance with the ambitions within the emerging South Downs Management Plan;*

4.8 As a result potential impacts on the setting of the SDNP has been considered as part of this landscape and visual appraisal.

## 5 Landscape baseline

### Landscape context

5.1 The following pages set out the baseline information relating to landscape and visual matters, in regard to:

- Landform and topography
- Public rights of way
- Landscape and seascape character (National, Regional and Local level)

### Landform and Topography

5.2 The site is gently sloping from east to west, but in the wider context is located on ground which rises 30m from the A31 to the south up towards Windmill Hill to the east. *(Refer to Figure 1 Appendix 1 Part 1)*

### Existing vegetation

5.3 The site is currently semi improved grassland, (comprising of perennial rye-grass ley, of low ecological interest) with native boundary hedgerows forming all boundaries. There are occasional gaps in the hedgerows which allow views into the site. There are no trees within the site, but there are mature trees within the hedgerows.

### Statutory and Non-Statutory Designations

5.4 The site itself does not lie within any national landscape designations such as an Area of Outstanding Natural Beauty (AONB) or National Park (NP). Neither does it lie within any locally designated landscapes. The northern boundary of the SDNP boundary lies some 800m south at its closest point. There are no TPO's on site or within the immediate area. *(Refer to Appendix 1 Part 1 Figure 12)*

### Listed Buildings, Scheduled Monuments, Registered Parks and Gardens, Conservation Areas

5.6 No part of the site lies within or adjacent to any parks or gardens listed on English Heritage's Register of Parks and Gardens of Historic Interest (RPGs). There are no listed buildings or scheduled monuments on the site, or within the study area. The site is not located within any Conservation Areas. (CA's) However, there are four CA's within Alton and one, Chawton, outside the parish boundary to the south. The majority of CA's within Alton are at, or to the north of, the historic centre and have no visual or physical interrelationship with the site and so have not been considered further here. *(Refer to Appendix 1 Part 1 Figure 14)*

### Public rights of way (PRoW's) and land with public access

5.7 Whilst there are no public rights of way running across the site, there are number of PRoW's in the study area. No 52 runs down the eastern boundary of the site, No 53 runs just east west, south of the southern boundary of the site, and there are a number of paths crossing the informal Public Open Space (POS) to the east, with 49 and 50c crossing the A31 to the south east. The paths feed into the residential areas to the north, and are well used. *(Refer to Appendix 1 Part 1 Figure 5)*

## **Landscape character**

- 5.8 To report on the Landscape character of the wider area, and the application site which lies within it, it is important to understand its context, and this can be examined firstly at a National, then Regional (County) and Local level, referring to existing landscape character assessments carried out by others and then through a field survey carried out as part of this LVA, specific to the application site.
- 5.9 It is also important to establish the landscape condition, value and sensitivity of the application site and the landscape within the study area, after having established the magnitude of change resulting from the proposed development, (which is dependent on the size or scale, duration and reversibility) in order to appraise the potential landscape effects upon it.

## **National Landscape Character**

### **National Level Landscape Character Assessment**

- 5.10 The landscape of England has been subject of a nationwide Landscape Character Assessment. Natural England, the former Countryside Agency, in conjunction with English Nature produced 'The Character of England: Landscape, Wildlife and Natural Features'. The Character of England divides the English countryside into 159 separate Joint or National Character Areas.
- 5.11 The site falls in NCA 130 'Hampshire Downs' (*Refer to Figure 6 Appendix 1 Part 1*) near its eastern boundary with NCA 120 'Wealden Greensand'. Key characteristics of NCA 130 'Hampshire Downs' of relevance to the LVIA include:
- *The rolling, elevated, chalk arable downland has an open, exposed character that provides open skies and long-distance views.*
  - *Elevated plateaux and upper valley slopes are characterised by extensive open tracts of large, low-hedged fields with thin chalky soils, shelterbelts, and ancient semi-natural woodland blocks on clay-with flint caps on some of the steeper slopes.*
  - *There is widespread evidence of prehistoric settlement on the open downlands, including burial mounds with visually prominent iron age hill forts. In the valleys, there is evidence of Roman estates and nucleated medieval village settlement patterns, and fieldscapes and farmsteads across the downlands evidence the gradual and planned enclosure from the medieval period.*
- 5.12 The 'South Downs Integrated Landscape Character Assessment (Updated 2011) (LUC for the December 2005 (Updated 2011) shows the SDNP land to the south west of the site, at its closest point to the site, falling within landscape type (LT) D 'Downland Mosaic', character area (LCA) D4a 'Newton Valence Downland Mosaic' sub division a 'Enclosed'.

5.13 With regard to this area the LCA Notes that:

*“The Newton Valence Downland Mosaic comprises a small block of undulating chalk downland in the far north of the South Downs, on the edge of the Wey Valley. ... The north-eastern and northern boundary of the character area is defined by the final National Park boundary beyond which lies the town of Alton, in the Wey Valley. There is a gradual transition between this area of downland mosaic and the chalk valley of the Wey.*

5.14 The generally low lying enclosed nature of this character area is relevant to the assessment of visibility from the SDNP area, at its nearest point, towards the site.

#### **County Level Landscape Character Assessment**

5.15 At a county level, the ‘Hampshire Integrated Landscape Character Assessment’ (Hampshire County Council, 2010) (HILCA) provides a more detailed assessment of the landscape character areas in the county.

5.16 The HILCA identifies 23 Landscape Character Types (LCTs), which are generic and can occur anywhere in the county. The county is further divided into 62 geographically unique Landscape Character Areas (LCAs). The site falls within LCA 3f ‘Wey Valley’. The area and boundaries of this LCA are shown on the Figure 7 at Appendix 1 Part 1.

5.17 This character area has similar boundaries to the District level assessment LCA 4b ‘Northern Wey Valley’ which is discussed below at 5.26. *(also refer to Appendix 1 Part 1 Figure 8)*

5.18 The key characteristics of LCA 3f ‘Wey Valley’ which are of relevance to this site are described as:

- *Broad valley with smooth undulating valley sides through which the River Wey flows;*
- *Distinct flat valley floor with permanent pasture, wet woodland, water meadows and open water;*
- *Large to medium scaled arable fields cloak the open valley sides;*
- *Woodland in the upper valley slopes form wooded skylines in places;*
- *Valley is and has historically been an important routeway and transport corridor containing the A31 and main rail line;*
- *St Swithun’s Way long distance route, part of the Pilgrim’s way which connected Winchester with the North Downs;*
- *Many historic features associated with the river Wey e.g. mills, weirs, watercress beds’; and*
- *Nucleated settlement pattern of a string of villages on the gravel terrace on the north side of the valley floor less development on the slightly steeper southern valley side.*

5.19 It is considered that the site, falls within the area described as valley side.

5.20 The ‘Physical Characteristic and land use’ section of the LCA description notes that:



*“The floodplain is dominated by permanent grassland for cattle grazing and some areas of pony paddock defined by well managed hedgerows and ditches. ... Woodland is also a feature of the valley floor often lining the watercourse and willow trees are characteristic. The pattern of land-use and vegetation on the valley floor gives rise to a medium scaled landscape pattern and a sense of enclosure. This contrasts with the valley sides which are generally open with little to no woodland (except on upper slopes where it forms a wooded skyline) and land use is arable. Field sizes are generally large scale defined by well trimmed hedgerows. ...”*

5.21 The ‘Experiential/Perceptual Characteristics’ section of the area notes that:

*“From the valleys sides there are more open views across the valley floor and up and down the valley but in all cases the sense of place of this landscape is determined by the valley form.*

*This landscape is relatively tranquil and its broad character enables it to accommodate development and pylons to some degree. However the A31 impacts greatly on the tranquillity through the heart of this landscape. ...”*

5.22 Within the evaluation section of the LCA 3f ‘Wey Valley’ none of the key qualities, forces for change or opportunities is considered to be of direct relevance to the site. The force for change of most relevance is:

*‘New housing development mainly small scale and the cumulative impact of infill sites to settlement morphology and conversion of historic buildings.’*

5.23 The HILCA includes townscape assessments including the ‘Alton Character Assessment’ (Final, Autumn 2010). This assessment divides Alton into different townscape character areas and sub areas. The site lies adjacent to character area ALT04 ‘Residential suburbs’ with sub-area 04h ‘The Ridgeway environs’ adjacent to the northern boundary. (Refer to Figure 10 Appendix 1 Part 1)

5.24 An extract of the description of this sub area is included below:

***‘04h. The Ridgeway environs’***

- *Housing development mostly of the 1970s and early 1980s at a medium to fine grain with an irregular layout*
- *Topography is steadily falling from east to west*
- *Small to medium-sized plots laid out mostly in short terraces or semi-detached houses to a series of cul-de-sacs accessed off a main feeder road*
- *Building lines are consistent and staggered throughout due to the meandering nature of the cul-de-sacs, mostly small open front gardens*
- *Red and buff brick, hanging tile, clay tile and concrete interlocking tiles*
- *Two-storey, low-pitched roofs*
- *Residential throughout; private dwelling houses*
- *Small areas of open space between groups of houses, very limited numbers of mature trees to rear gardens, mostly ornamental trees to front and rear gardens*

- *Wide roads and mostly open boundaries give the impression of space to cul-de-sacs, grass verges but no street trees, on-street parking throughout, dead frontage to feeder road*
- *Good access but poor connectivity despite a series of footpaths linking the area to the town centre and open countryside*

#### **District Level Landscape Character Assessment**

5.25 The characterisation of the area has been taken to a further level of detail by the 'East Hampshire District Landscape Character Assessment' (LUC on behalf of EHDC, July 2006) (EHDLCA). The study was undertaken in conjunction with a landscape character assessment of the South Downs.

5.26 The site lies within the LCA 4b: 'Northern Wey Valley' which forms part of the LT 4: 'Chalk Valley Systems'. The boundaries of this LCA is shown at Figure 8 Appendix 1. LCA 4b: 'Northern Wey Valley' has similar boundaries to the county level assessment LCA 3f 'Wey Valley' discussed above. The key characteristics of relevance to this LVIA are given below:

#### **Key Characteristics**

- *The northern chalk valley sides are indented by short coombe valleys and form bold bluffs overlooking the valley.*
- *The valley floodplain is predominantly pastoral with arable cultivation on the valley sides.*
- *Hanging woodland is occasionally present on the steeper slopes of the valley sides.*
- *The upper part of the valley is centered around the market town of Alton*
- *Main transport routes (A31 and railway) cut across the flat open valley floor, interrupting the otherwise tranquil character.*

5.27 In addition, the assessment describes Perceptual/Experiential Landscape characteristics, those of relevance are listed below:

*'The scale of the landscape is varied along the course of the valley as a result of the variety of land uses. On the higher valley the arable land use creates a more open landscape with some long views across the valley.*

*The A31 impacts greatly on the tranquillity of this landscape. In the valley bottom, the hedgerows and trees reduce the visible and audible impact of A31 and railway. However, when viewed from the higher elevations of the valley sides the busy A31 and the railway line are dominant features.*

*The Wey valley is accessible and forms a major transport corridor linking Alton and Guildford. This has resulted in a degree of fragmentation and detracts from the visual unity of the landscape. There are a number of footpaths linking the nucleated settlements of the valley sides.... There is a sense that whilst accessible, the landscape is used for passing through, rather than for recreational purposes.'*

- 5.28 The assessment identifies Key sensitivities within the character area, which include:
- *'The presence of the larger settlements of Alton and Farnham at either end of the valley create strong pressure for change along the main transport corridors.*
  - *The open, character of this landscape with limited woodland cover amplifies its visual sensitivity with views afforded from one side of the valley to the other. Any new development or large scale change would therefore be highly visible, however its impacts could be mitigated through appropriate planting.'*
- 5.29 The document also sets out Landscape Strategy and Guidelines which include an overall management objective to conserve the tranquil, natural character of the Northern Wey Valley.
- 5.30 With reference to Development Considerations, the document suggests further incremental linear development from Alton along the A31 is monitored, seeking to conserve a rural landscape along the valley between Alton and Farnham.

#### **Alton Study Final Report (ASFR)**

- 5.31 As mentioned in the introduction, the 'Alton Study Final Report' (Urban Initiatives Studio for EHDC, June 2013) marks the first stage of a process that will consider how Alton may develop in the future.
- 5.32 At Section 2.2 'Landscape setting' (*Refer to Figure 17 Appendix 1 Part 1*) the ASFR notes that:
- "The essence of Alton resides in the fact that the town is 'hidden' from the landscape whilst being an integral part of it.*
- Development has been constrained from breaking the green skyline formed by the neighbouring hills, which can be seen from all parts of the town.*
- The undulating, yet open, nature of the land allows panoramic views which give a sense of space, freedom and tranquillity. From most viewpoints surrounding Alton, the town disappears within the landscape as development has not been extended to the skyline. ...*
- In considering the longer term growth of Alton this landscape setting and these considerations will be of considerable importance. However Alton's seclusion could be seen as a disadvantage when raising the profile of the town and attracting investment. Alton is passed quickly on the A31 with very little reference and some positive interventions to create gateways into the town could be beneficial provided that they are discrete and do not detract from the landscape setting."*

#### **Alton Town Design Statement (ATDS)**

- 5.33 Within the 'general description' section the ATDS notes that:
- 'The market town of Alton, at the northern source of the River Wey, is encircled by sloping downlands, woods and fields, both arable and pasture, bounded by ancient hedgerows. It is an important social and commercial centre for the surrounding countryside.*

*It is not one single element that provides the intrinsic landscape interest, but the composition as a whole. The essence of Alton resides in the fact that the town is 'hidden from the landscape whilst being an integral part of it. It is important therefore to ensure that the edge of Alton continues to be contained to prevent development encroaching up into the downland and into the landscape that surrounds the town. Some of the key views into and out of the town are indicated on Map 3.'*

5.34 The main elements that provide the intrinsic landscape interest of the setting of Alton that are of relevance to the site are highlighted by the ATDS design guideline 3.5 given below:

*'The skyline on the hills surrounding Alton is one of its most valuable and appreciated features. Development should continue to be contained from encroaching up into the surrounding downland and onto the skyline.'*

5.35 With more specific reference to the site, the ATDS has a heading 'Skyline' where it notes that:

*"The skyline is crucial to Alton's distinctive 'sense of place' and enhances the outward views available from within the proposed South Downs National Park, exemplified by the prospect of Windmill Hill as seen from Chawton."*

5.36 In summary, whilst these assessments present a useful overview of the character of the local context at each level: regional, county and district, it is also essential to look at the finer grain of the condition, value and sensitivity of the site and its immediate environs, which is carried out below in our site specific assessment which forms the basis of this report.

### **Landscape condition**

5.37 Overall, the site contains very few landscape features of note. Hedgerows are of varying composition and structure, and the grass sward field is of low ecological interest. The only trees on site are those within the field boundaries. The field boundaries to the east are also formed of post and wire fencing which is not continuous and in various states of repair. Development on the site would be substantially unconstrained in terms of effects on existing features and there is considerable potential for improvement/enhancement from the baseline. The site is relatively tranquil, being far enough away from the A31 for road noise not to be apparent, and traffic on the road is not visible from within the site looking south, due to the dense vegetation on the northern side of the A31 screening it. *(Refer to Figure 13 Appendix 1 Part 1 tranquillity map)*

### **Landscape value**

5.38 The site itself is not designated for its landscape value nor does it form part of any such wider designated unit at any level or contain any protected landscape features. The landscape character of the site is therefore considered to have a low value when assessed against the methodology.

5.39 The landscape value of the setting of Alton is however medium, as the settlement edge is sensitive in as far as the town has always, even during its late 20th century expansions, been contained by Windmill Hill, hiding it

from views from the A31. The landscape value of the landscape character area identified as LCA 4b, 'Northern Wey Valley', shown by EHDC falls entirely outside the SDNP and is therefore considered to also have a medium value overall i.e it is an area of undesignated countryside and landscape features, with some distinctive landscape characteristics, and few landscape detractors, albeit the A31 has been recorded as affecting the tranquillity of the character area.

### **Landscape sensitivity**

- 5.40 Sensitivity to change, is defined as the ability of the landscape receptor, (whether that be the overall character or quality/condition of a particular landscape type or area, or an individual element and/or feature, or a particular aesthetic and perceptual aspect) to accommodate the proposed development without undue consequences for the maintenance of the baseline situation. Sensitivity is categorised as high, medium, or low, according to the degree to which a particular landscape or area can accommodate change.
- 5.41 Scottish Natural Heritage define sensitivity as:  
*'The degree to which the character and qualities of the landscape are affected by specific types of development and land-use change. Sensitivity depends upon the type, nature and magnitude of the proposed change as well as the characteristics of the host landscape. High sensitivity indicates landscapes are vulnerable to the change; low sensitivity that they are more able to accommodate the change and that the key characteristics of that landscape will essentially remain unaltered.'* Landscape Character Assessment Guidance for England and Scotland - (2002) Countryside Agency / Scottish Natural Heritage.
- 5.42 This is judged by combining the susceptibility of the landscape receptor to the type of change or development proposed with the value attached to that receptor through protection by designations or contribution at a community level. It is based on the following factors: landform, sense of openness, field pattern and scale, land cover, perceptual qualities, historic landscape character, distinctive landscape features and scenic quality. *(Refer to methodology in Appendix 2 for sensitivity levels and definitions.)*
- 5.43 As the site is currently a green field, with no development upon it, it has a sense of openness, and is located on high ground, to the edge of a settlement, but without a landscape designation, it should be considered to have a landscape sensitivity level of medium, as would the wider study area, whereby, some of the key characteristics and qualities of the landscape are susceptible to change from the type of development being assessed.

## 6 Visual baseline

- 6.1 Having identified the landscape baseline, this assessment turns to the visual baseline to establish the area in which the development may be visible, and identify the type of visual receptors (people) likely to be most affected by the proposed development. Once the visual receptors are identified and recorded, the potential changes to these receptors caused by the proposed development can be assessed. Initially, it is necessary to define the extent of visibility both within and outside the site. This should include public viewpoints, including areas of land and buildings providing public access, open access land, and public footpaths and bridleways, visitors to the study area, transport routes and places of work.
- 6.2 The desktop studies and field surveys have helped to identify a series of viewpoints that were regarded to be representative of the range of views and receptors around the site. The selected viewpoints are not intended to cover every single possible view but are intended to be representative of a range of receptor types e.g. residents, walkers on public footpaths and road users, from different directions and distances from the site. Those that have been assessed are from publicly accessible locations.

*'For the visual baseline the aim is to establish the area in which the development may be visible, the different groups of people who may experience views of the development, the viewpoints where they will be affected and the nature of the views at those points.'* (Guidelines for Landscape and Visual Impact Assessment (GLVIA), 3rd Edition (2013 Para 6.3)

### Public Views

- 6.3 Key viewpoints looking towards the proposed development have been selected through desk and field survey. As with the landscape desk studies, these key and representative views have been selected by reviewing data collected from various sources, including Local Planning Authorities, statutory agencies, Ordnance Survey maps, and aerial photographs. The desk study has been followed up with field surveys to add further detail and to identify a number of representative viewpoints.
- 6.4 Baseline photographs have been taken with a 50mm lens in landscape format using a digital camera at eye level from key viewpoints. These photographs have been reproduced in the assessment (*Refer to views \*\* and in Appendix 1 part 2*) together with a description of the views. The visual baseline has established the area in which the development may be visible, and identified the type of visual receptors likely to be most affected by the proposed development.
- 6.5 With reference to visual sensitivity, the sensitivity of the visual receptor needs to be established which is dependent on a combination of the value of the view, and the susceptibility to change. (*Refer to Appendix 2 Methodology for further detail*)

- 6.6 A view summary of the representative views has been given below, working around the application site in a clockwise direction from the north.

#### **Visual sensitivity**

- 6.7 With reference to visual sensitivity, the sensitivity of the visual receptor needs to be established which is dependent on a combination of the value of the view, and the susceptibility to change.
- 6.8 The views from main A roads are considered to have a 'low' sensitivity, as the views are transitory, however they can be considered of medium sensitivity if the landscape through which they pass is perceived to be of value, an individual approach to reviewing the sensitivity of each view from a road needs to be considered. Conversely, views from PRow's are considered to have a 'high' sensitivity, and particularly those PRow's in the study area are which are within the AONB since the users' attention is often focused on the landscape. Views from residential properties also have a high sensitivity, whereby residential properties are susceptible to visual impacts as the residents experience the impacts on a regular and prolonged basis.
- 6.9 Visual effects are considered later in this appraisal through the appraisal of the sensitivity of the receptor (value and susceptibility to change) against the magnitude of change (size or scale, extent, duration and reversibility) as described in the evaluation criteria (Appendix 2).

#### **Views from the north**

- 6.10 Publicly accessible views to the site from the north are very limited, being restricted by the existing vegetation on the northern boundary of the site occupying two thirds of its length. The remaining third is defined by the existing residential development at Cowdray park and the neighbouring residential properties of Plumpton Way and The Ridgeway to the north of the site, with publicly accessible views of the site limited to a short section of public highway along Cowdray Park (road). *(Refer to Appendix 1 Part 2 Views 1-4)*
- 6.11 There will be private views available from a small number of terraced residential properties at Cowdray Park who face onto the site and overlook it, (No's 11, 15, 17 and 19) together with one property at the far eastern end of the cul de sac, immediately adjoining the northern boundary, with a side elevation facing onto the site. (No 25) Views from residential properties also have a high sensitivity.

#### **Views from the east**

- 6.12 Views from the east are restricted by the existing vegetation which forms the eastern boundary to the site, with views being glimpsed through gaps in the hedges and by the topography of Windmill Hill. The area to the east of the site is an area of public open space, with numerous public rights of way crossing it, and as one rises towards the top of Windmill Hill, views across the site are more available given the elevation. At the top of Windmill Hill is a copse of trees which mask a communications mast, and an underground reservoir, and this

area is not publically accessible and partially screens the view from footpath 50c. *(Refer to Appendix 1 Part 2 Views 22-24)*

- 6.13 The views from the top of the hill are panoramic, and take in the town of Alton to the east and the higher land of the SDNP to the south and west. The POS is well used and a popular spot for informal recreation, dog walking etc, with bench seating provided in various key locations to enjoy the view. The sensitivity to change of visual receptors is therefore assessed as high. There are no properties to the east of the site, and no private views. *(Refer to Appendix 1 Part 2 Figure Views 5-7 and 22-23)*

#### **Views from the south**

- 6.14 Publicly accessible views from the immediate south on the northern side of the A31 are not available due to the rising topography which hides the site. There are no views from the PRoW (53) which runs south along the eastern boundary of the site, and when it turns east to join PRoW 50c, a tall hedge which runs parallel to the path completely screens any views looking back towards the site. Whilst the sensitivity to change of visual receptors is therefore assessed as high, there are no views to assess from this direction. *(Refer to Appendix 1 Part 2 Views 12-14)*
- 6.15 Similarly, publicly accessible views towards the site from the north from the A31, including the layby on the north bound carriageway, are also not available, due to the rising topography, the site being over the brow of a hill, with two separate and parallel field boundary hedgerows running continuously across the field of view, in an east west direction providing further screening. *(Refer to Appendix 1 Part 2 View 21)*
- 6.16 With reference to visual receptor sensitivity, the A31 is a dual carriageway where users are generally travelling to a location rather than with the purpose of enjoying the view and so are assessed as having a low susceptibility to change. The viewpoint is located at a stopping point but is not within a designated landscape so that the values of views from this viewpoint are assessed as low. The sensitivity to change of visual receptors is therefore assessed as low.
- 6.17 More distant publicly accessible views from the south are however possible, from within the SDNP, and these have been assessed along PRoW No 7. *(Refer to Appendix 1 Part 2 Views 24-26)*
- 6.18 As the crow flies, these views are over a kilometre away, and are glimpsed through intervening vegetation on either side of the A31, on either side of Wolfs Lane and Selborne Road and boundary hedges to the agricultural and horse grazing fields to the north of the PRoW. No 25 Cowdray Park is just visible in the views from the PRoW as are the farm buildings of Borovere farm. The site will occupy the space between the farm buildings and No 25 Cowdray Park. This view will also change when the consented scheme for land to the east of Selborne Road is developed. *(Refer to Viewpoint 12 of EDP's LVIA in our Appendix 1 Part 1 Figure 19 which includes a photomontage)*



6.19 This PRoW connects from Chawton to the B3006, at Whitehouse Farm, across the northern edge of the SDNP. This is the closet PRoW to the site within the National Park. This is a local footpath the users of which are generally considered to be there with the purpose of enjoying the view are therefore assessed as having a high susceptibility to change. However, due to the location of the viewpoint within the National Park the value of views from it are assessed as very high. The sensitivity to change of visual receptors is therefore assessed as high.

#### **Views from the west**

6.20 Publicly accessible views from the immediate west are not available, due to the screening provided the built form of Borovere Farm Business Park. Views from the farm complex are also restricted by existing vegetation on the western boundary of the site and are not public, and views from commercial buildings are of limited importance therefore their visual sensitivity is low.

6.21 Views looking north west from the highway junction of the A31 and the slip road onto Selborne Road as it heads towards west towards The Butts, are both distant, and screened by existing vegetation to the sides of the A31 and the hedges along the southern side of the site. There is no pavement at this location, and the road users are assessed as having a low susceptibility to change. There are no PRoW's in this area and therefore any potential glimpsed views are from the public highway. The sensitivity to change of visual receptors at these viewpoints is therefore assessed as medium to low.

#### **View summary**

6.22 This baseline assessment of visual amenity and views has found that while views out from the site across the surrounding landscape are locally extensive (especially from the high ground), the visibility of potential development in views back to the site from the wider landscape is limited by vegetation, settlement and its near context. The visual receptors include views from residential properties, from PRoW's and from road users, and the sensitivity to change varies accordingly from 'High' for the residential properties and PRoW's to 'medium to low' for the road users.

## **7 Assessment of effects upon Landscape baseline**

7.1 This section identifies impacts which may be caused by the proposed development on the landscape. The assessment process identifies the landscape resource, its sensitivity to change value, the magnitude of change, and the significance of effect.

7.2 The magnitude of change however is hard to quantify precisely as no firm proposals have been made, however for the basis of this appraisal we have assumed a density of development to be similar to that at land to the east of Selborne Road of 30 homes /ha, and similar design principles to those shown in their landscape masterplan included in [Appendix 1 Part 1 Figure 18](#). These design principles have been set out below, and on the basis that they are adopted, the assessment of effects on the landscape baseline can be carried out.

### **Design principles**

7.3 These principles will include the following:

- reinforcing all boundaries with further native hedge and tree planting to enhance the existing landscape buffer, and to assimilate the proposed development into the landscape. This would include providing some separation by way of further planting structure planting, located between the existing properties at the end of Cowdray Park and any properties proposed for this site, to reduce the visual impact of the side elevation of No 25 which is currently visible from long distant views from the SDNP, and to ensure no development sits directly on the skyline, but rather sits below it.
- to include areas of native planting within the masterplan to break up the areas of housing and to reinforce the characteristics of the site through planting native hedges along the contours to break up views across the site, creating further green links for wildlife and people.
- to maintain views towards Windmill Hill, so as not to screen the trees on the top which are a landmark feature in long distant views and are seen as a distinct copse or clump of trees at the highest point.
- to incorporate pedestrian links within the masterplan which will link to existing PROW's to encourage permeability through the site to adjoining residential areas (including the consented scheme to the west of Borovere Farm) and the adjacent POS to the east.
- to ensure building heights are appropriate to the context of the site, to ensure the roof tops can be screened by tree planting and do not protrude above the skyline. As part of this assessment, reference has been made to the consented scheme for land east of Selborne Road (Planning ref 30021/056) for guidance on what might be acceptable in this context. In summary, the building heights in that consented scheme vary from 2 storeys across the majority of the site with occasional buildings at 2.5 storey and 3 storey properties, with 2 storey properties on the more elevated areas of the site. It was considered for the consented scheme that this mix of heights, in combination with the mix of orientations of buildings and roofs, will have the advantage of breaking up the roofscape stacking up the slope. This principle would be adopted for this development site but given the elevation of the site, 3 storey properties would be avoided.

## **Magnitude of change**

- 7.4 In order to assess the effects of the development on the landscape character, it is necessary to determine the magnitude of change which will occur which has to be evaluated in terms of its size or scale, its geographical extent and the duration and reversibility of the change.

### **Magnitude of change regarding the character of the site**

- 7.5 Clearly, in terms of land use of the site itself, there will be a loss of farmland and its character will fundamentally and irreversibly change should the proposed development be implemented. The magnitude of change will be high with a major alteration to key elements of the pre-development landscape. However, there are no factors in terms of the site's biodiversity, arboricultural, heritage or archaeological value which preclude the change of use as a matter of principle, and there are elements of the character of the site that will remain, for example the field boundary vegetation, which will also be enhanced by further planting and infill planting.
- 7.6 The proposed residential development has the ability, if designed appropriately in accordance with the design principles set out above, to constitute an element that is not uncharacteristic within the existing landscape. In addition it could incorporate characteristic features of the local countryside and settlement character which will be increasingly beneficial as the proposed landscaping matures to reinforce the features which assist in defining the wider character area. Together these factors should reduce the magnitude of the impact of the proposals on the landscape character of the site.
- 7.7 The magnitude of change on the character of the site and its context as a result of the proposed development will, therefore be positively affected by the following considerations:
- The limited effect on the site's landscape fabric as the existing vegetation at the site boundaries can be retained.
  - The limited visibility of the site will substantially limit the effects on the character of the wider landscape.
  - The small scale of the site in comparison to the landscape character units within which it sits.
  - The proposed residential development is entirely consistent, in land use terms, with the adjacent residential development and will not constitute a land use which is incongruous.
  - If the development follows the design principles set out above, it should readily be assimilated into the landscape context.

### **Magnitude of change regarding the landscape character units in the study area**

- 7.8 The site is included within the landscape character area LCA 4b 'Northern Wey Valley' a large proportion of the LCA represented by the settlement of Alton. This, combined with the medium value of this LCA gives a medium sensitivity to change.

- 7.9 The magnitude of change to this character area will be low, whereby:  
*‘a minor loss or alteration to one or more key elements of the pre-development landscape, or the introduction of elements which constitute a minor component of the wider landscape, and are not uncharacteristic when set within the attributes of the receiving landscape.’*
- 7.10 Accordingly, whilst this proposal will yield irreversible and wholesale change to the character of the site itself this assessment finds no ‘in principle’ reasons why the change of land use should be found to be harmful to the landscape character area of which the site forms a very small part. It is therefore not considered unacceptable in terms of the effects on the wider landscape character.

### **Significance of effect**

- 7.11 The magnitude of change upon the landscape receptors of the site will be high, and in the wider study area, will be low, with the effect being very localised in all cases. If the design principles at 7.3 are followed and incorporated into the design, secured through the detailed planning stage and conditions, we have concluded that the significance of effects assessment of the proposals on the landscape of the site will be moderate adverse, i.e a *‘direct change to landscape feature/character over a localised area.’*
- 7.12 The significance of effects assessment of the proposals on the landscape of the landscape character area unit within which the site lies will be slight adverse, i.e a *‘Perceptible indirect change in landscape characteristics over a very localised area’*. In summary it is a small scale development when considered within the larger character area, which includes areas of existing settlement, i.e Alton, and it is adjacent to the existing settlement boundary. However, with appropriate mitigation, and if designed in accordance with the design principles set out in this assessment, the development of this site for housing will not constitute an unacceptable effect on the landscape character of the town of Alton.
- 7.13 The site does not lie within the SDNP but lies some 800m from its northern boundary at its closest point. The effect of the proposals with regard to the SDNP is therefore relevant with regard to its effect on the landscape character of the SDNP.
- 7.14 The scale of change and geographic extent of the proposals on the character of the SDNP will be very low because visibility to the site from the SDNP is very limited. In addition, where there is visibility to the site from the SDNP, the site is over 1km away, and forms a very small part of what is generally a broad panoramic view and is seen in the context of the agricultural buildings at Borovere Farm. The overall magnitude of change in the character of the SDNP will, therefore, be low.
- 7.15 The significance of effect of the proposals on the landscape character of the SDNP will be neutral: *‘Virtually imperceptible or no indirect change in landscape characteristics over a very localised area, or virtually imperceptible, or no direct change to landscape components/character’*.

- 7.16 This assessment finds no 'in principle' reasons however, why the proposal should be found to be so harmful as to be unacceptable in terms of the effect on the landscape character or setting of the NP.

## **8 Assessment of effects upon Visual baseline**

- 8.1 This section assesses visual impacts on visual receptors, using the receptor sensitivity established in the Visual Baseline against the Magnitude of Change arising from the proposal in a particular view.
- 8.2 The overall significance of the visual impacts, based on the combined effect of the elements described in the paragraph above is summarised below using criteria stated in the methodology tables in Appendix 2. Only those views where the site would be visible have been assessed.

### **Visual Sensitivity level**

- 8.3 Visual effects are considered through the appraisal of the sensitivity of the receptor (value and susceptibility to change) against the magnitude of change (size or scale, extent, duration and reversibility) as described in the evaluation criteria (Appendix 2).

### **Views from the north**

- 8.4 The public views from the footpaths on Cowdray Park looking south and those of the properties which face onto the site will completely change as a result of any development on the site, The magnitude of change is therefore assessed as high. These views are however extremely limited and affect a very small number of properties. (No's 11, 15, 17 and 19 and 25).
- 8.5 The significance of effect is moderate adverse: *'The proposals would be visually intrusive and would cause a noticeable deterioration in existing views, resulting in some disruption to valued views of the area.'*

### **Views from the east**

- 8.6 The glimpsed views from the east restricted by the existing vegetation which forms the eastern boundary to the site will be reduced by supplementary planting on the boundary. The views from the top of the hill are panoramic, and take in the town of Alton to the east and the higher land of the SDNP to the south and west, and it will be difficult from the highest point at Windmill Hill to screen all views of the roof tops of the proposed development. However as the views already include the built form of the residential properties of the Mount Pleasant area of Alton, if there are still glimpsed views available, the development of the site will not appear incongruous in the view. The magnitude of change is therefore assessed as very low.
- 8.7 The significance of effect is Slight adverse: *'Although not very visually intrusive, the proposals would cause a barely perceptible deterioration in certain views into and across the area.'*

### **Views from the south**

- 8.8 Only distant publicly accessible views from the south are possible, from within the SDNP, and these have been assessed along PRoW No 7. These views are over a kilometre away, and are glimpsed through intervening vegetation.
- 8.9 Development within the site will be substantially screened by intervening vegetation and if additional planting is carried out on the southern boundary of the site, this will further reduce visibility and will increase as the planting matures. Views towards the site are oblique to the line of the footpath and the site will be seen in the context of the farm and large agricultural buildings at Borovere Farm and the existing development at Cowdray Park, some of which is already visible. The proposed development will form a barely noticeable component in the view, particularly if the design principles set out above are followed. The view, whilst slightly altered, would be similar to the baseline situation giving a very low scale of change. This view will also change when the consented scheme for land to the east of Selborne Road is developed. The magnitude of change is therefore assessed as very low.
- 8.10 The significance of effect is Neutral: *'No discernible deterioration or improvement in existing views; the proposals would avoid being visually intrusive.'*

### **Views from the west**

- 8.11 As publicly accessible views from the immediate west are not available, due to the screening provided the built form of Borovere Farm Business Park, and views from the farm complex are also restricted by existing vegetation on the western boundary of the site and are not public, with further reinforcement of this western boundary through additional planting together with management of the existing vegetation, the magnitude of change on the visual amenity experienced from this viewpoint could be justifiably be assessed as low.
- 8.12 Views looking north west from the highway junction of the A31 and the slip road onto Selborne Road as it heads towards west towards The Butts, are both distant, and screened by existing vegetation to the sides of the A31 and the hedges along the southern side of the site. There is no pavement at this location, and the road users are assessed as having a low susceptibility to change. There are no PRoW's in this area and therefore any potential glimpsed views are from the public highway.
- 8.13 The significance of effect is Neutral: *'No discernible deterioration or improvement in existing views; the proposals would avoid being visually intrusive.'*

## **9 Compliance with Policy**

- 9.1 With regard to the SDNP, by virtue of the very limited visibility of the site from the SDNP this assessment finds no 'in principle' reasons why the proposal should be found to be so harmful as to be unacceptable in terms of

the effect on the landscape character or setting of the SDNP. The effect of the development will be very localised and will be seen in the context of the existing built form at Borovere Farm, and also, the consented scheme at land to the east of Selborne Road, yet to be constructed.

- 9.2 Whilst this proposal will certainly change the character of the site itself, with good design, the change of land uses should not be found so harmful as to be unacceptable in terms of the effect on the landscape character of the site, or the landscape character area of which the site forms a very small part, and the development of the site could be used to strengthen and enhance the settlement edge.
- 9.3 Policies CP19 Development in the countryside and CP20 Landscape both seek to protect and enhance the countryside, for the sake of its intrinsic character. The development of this site brings opportunities to protect and enhance the natural environment, retaining and reinforcing existing hedges, planting new areas of structure planting, creating green links and corridors, using native species to enhance biodiversity and creating a sense of place through good design. It is entirely feasible for the site to be developed at an appropriate scale, with appropriate local materials, whilst at the same time protecting and enhancing the intrinsic character, and this can be secured through detailed planning and conditions.

## 10 Summary and conclusions

- 10.1 Fundamentally the purpose of this appraisal is to assess whether the site is developable.
- 10.2 The site has few landscape constraints, it does not form part of a designated landscape, has no historic or archaeological constraints, no TPO's, and with the exception of the boundary hedgerows that surround it, which in any event would be retained, the site is of low ecological value. Proposals for development could significantly enhance its biodiversity. It does have a rural character, but adjoins a settlement boundary.
- 10.3 Development of this site will result in some landscape and visual effects, which are summarised below.
- 10.4 With reference to landscape effects on the site, the magnitude of change upon the landscape receptors of the site will be high. Clearly, in terms of land use of the site itself, its character will fundamentally and irreversibly change should the proposed development be implemented. If the design principles proposed in this appraisal are followed and incorporated into the design, secured through the detailed planning stage and conditions, we have concluded that the significance of effects assessment of the proposals on the landscape of the site will be moderate adverse, i.e a *'direct change to landscape feature/character over a localised area.'*
- 10.5 For the wider study and in the wider study area, the magnitude of change, will be low, with the effect being very localised in all cases and the significance of effect will be slight adverse, *'Perceptible indirect change in landscape characteristics over a very localised area'*. Again, very localised.
- 10.6 In summary it is a small scale development when considered within the larger character area, which includes areas of existing settlement, i.e Alton, and it is adjacent to the existing settlement boundary. The 'call for sites' submission document concludes that development of the site would *'form an illogical extension into the countryside beyond the existing pattern of development'*, and yet the LPA granted consent for the land to the east of Selborne Road without coming to the same conclusion, which had many similarities in terms of being to the south of the existing settlement boundary and being a greenfield site. It is not therefore illogical to suggest that it could be considered as an expansion area. With appropriate mitigation, and if designed in accordance with the design principles set out in this assessment, the development of this site for housing will not constitute an unacceptable effect on the landscape character of the town of Alton.
- 10.7 With reference to visual effects, the significance of effect on views from the immediate north is moderate adverse: *'The proposals would be visually intrusive and would cause a noticeable deterioration in existing views, resulting in some disruption to valued views of the area,'* but limited to a very small number of residential receptors, and with good design, there is a possibility that could be reduce to slight. For views from the east, the significance of effect is slight adverse, for the south the significance of effect is neutral, as is the west.
- 10.8 Therefore, whilst there will be some effects, it is not by definition, undevelopable.





These comments, whilst instructed by specific landowners are both generic (in terms of the reasoning for the consultation and its approach) but also tailored specifically to the individual client's needs to provide a working example of our suggested approach.

This current consultation of the Draft Local Plan is at Regulation 18 stage in accordance with The Town and Country Planning (Local Planning) (England) Regulations 2012. It provides an opportunity for responding parties to shape this important document.

There is a legal requirement<sup>1</sup> for the plan to reflect both national policies set out within the National Planning Policy Framework (NPPF) and associated National Planning Practice Guidance. Furthermore, whilst applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise<sup>2</sup>, the NPPF is also a material consideration in planning decisions.

In our opinion, the key to a successful and sound local plan is how it responds to the housing delivery requirements of the area. If this is correctly addressed, then the other requirements of the plan can fall in place behind this. Reflecting this objective the Draft Local Plan, at paragraph 3.4. recognises that significantly boosting the supply of homes is a key government objective (as set out at Paragraph 60 of the NPPF). To achieve this, the plan sets out that 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 planning permission is developed without unnecessary delay.

The plan, at Policy S1 Spatial Strategy, states that over the plan period (2021-2040), the Local Plan will make provision for the delivery of at least 9,082 new homes, equivalent to 478 homes per annum. This, as explained at paragraph 3.25, as of 31 March 2023, is a minimum requirement made up of 940 net completions and 3,965 existing planning permissions. Based on the windfall allowance analysis, there is also expected to be an additional 1,320 dwellings throughout the duration of the plan period that have not specifically been identified in the Local Plan. This results in a total of 6,225 dwellings.

Our first consideration is around these windfall allowances which make up, if the Council is to proceed on this basis, 21.2% of the total housing target for the district. The NPPF (current version below, unchanged from earlier versions of the document) explains the role that windfall sites play in housing delivery. It states:

**72. Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends. Plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area.**

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<sup>1</sup> Section 19, Subsection 2 of the Planning and Compulsory Purchase Act 2004

<sup>2</sup> Section 38(6) of the Planning and Compulsory Purchase Act 2004 and Section 70(2) of the Town and Country Planning Act 1990



“**Compelling** evidence that they will provide a **reliable** source of supply”. Whilst we agree that such windfall development has the potential to assist the authority in meeting its minimum requirements, historically through advice and evidence of delivery, the planning system has delivered roughly 10% of its dwellings through windfalls. So, what is the **compelling** evidence that EHDC will successfully deliver 21.2% of its housing requirement through windfall sites?

We have read, with considerable interest, the Council’s evidence document entitled “Windfall Allowance: Updated Methodology Paper (October 2023)” which explains show the 1320 dwellings were calculated. The starting consideration is the historic delivery of windfalls and, whilst Table 1 suggests 25.3% housing delivery through windfall sites for the period from 2011 through to 2023, there are several important considerations to take from this.

- The early years of the local plan coincided with the Government changes to Permitted Development which has allowed, at various times, offices, warehouses, industrial buildings, agricultural buildings etc. to be converted into dwellings outside of the normal planning permission process.
- Whilst these allowances remain available, there is considerable evidence that the stock of buildings to change use to residential under the provisions is significantly diminished. The number of prior approval applications has been reducing year on year for several years now as evidenced from the text below from the Department for Levelling Up, Housing and Communities – planning application statistics 2022 (the most recent data) which we append to this letter.

**Taking i) granted applications and ii) those for which prior approval was not required together, 5,800 applications were approved without having to go through the full planning process, down 28 per cent from a year earlier. Within the 28 per cent decrease in the reported total number of PDR applications between April to June 2021 and April to June 2022:**

- larger householder extensions decreased by 29 per cent;
  - change of use from agricultural to residential decreased by 12 per cent; and
  - ‘all other’ permitted development rights decreased by 18 per cent.
- The accompanying spreadsheet from the same source (Live Table PDR1) shows, for example, 995 applications for office to residential conversion (Class O General Permitted Development Order) per quarter between April 2014 and April 2015. The average Class MA (which replaced Class O and which includes more uses) was 282 applications per quarter between October 2022 and October 2023. Similar trends can be seen in other PD changes of use.
  - This is broadly consistent with the trend shown in Table 1 for EHDC for the delivery of windfall dwellings. If the statistics are taken for the most recent 6 year period from 2017 to 2023, 581 new windfall dwellings have been delivered out of 3675 homes – a windfall delivery rate 15.8 per cent. This is 5% below the suggested delivery rate of the Draft Local Plan.
  - For periods between 2012 (when the NPPF was introduced) and 2023, the Council has been operating under the *Presumption in Favour of Sustainable Development* (otherwise known informally as the tilted balance) of paragraph 11 of the NPPF. This means that the Council has been obliged (often through the appeal process) to deliver houses which are contrary to the development plan provisions to help maintain the supply of houses. Of particular relevance is that the Council has been operating under the presumption for all of 2023 and continue to be unable to demonstrate a 5 year housing land supply. Given the extra protection of the new NPPF (2023) for Authorities that have a 4 year land supply **and** which are consulting on a new local plan, this supply of housing will cease in the short term.



- Of course, no new local plan should assume (or be willing to accept at any point) that it will fail to maintain the required supply of housing (a 5 year housing land supply as required by the NPPF) and therefore there should be no reliance, in calculating the windfall delivery, on any dwelling which is delivered contrary to the development plan provisions.

On the basis of the above analysis, there is no **compelling** evidence that the suggested quantum of windfall development will be delivered or that it is a reliable source of housing supply at the level suggested. At absolute maximum should the council expect windfall delivery rates to be at 15% rather than the 21.2% predicted in the Draft Plan. If we apply this rate to the target figure of 6225 dwellings, this means that 934 dwellings (at best) will be delivered through windfalls. The Council therefore, through the emerging plan, needs to plan proactively for the delivery of **386 additional dwellings** just on the basis of the flawed windfall approach alone (we are sure other representations will be challenging the housing target more generally).

Alton, the main town in the District and the only Tier 1 Settlement in the draft local plan, is allocated for 1700 dwellings, 27% of the overall housing target for the district as currently set. If the lost windfall sites are pro-rated down to the target area, then immediately the Council must find an addition **105 dwellings** in (or, more realistically) around Alton. This is likely to require an additional allocation over and above the existing draft allocations. In reality, if the target district housing numbers increase or if any of the draft allocations are deemed as being unsuitable, then further development opportunities/site allocations will be needed around Alton.

### **Housing delivery of the shortfall**

Given the evident shortfall in housing delivery through the over optimistic approach to windfall housing aloe, the Council therefore needs to identify additional sites to deliver the shortfall in houses. We note with interest and particular relevance to these representations, that the Draft Plan is proposing a considerable sites allocation, effectively an urban extension, to the east of Alton and a large allocation to the west of the town as shown by the extract from the draft local plan map below. Strangely, and as a deviation from previous approaches, there is no more development planned to the south of the town in the area between the existing urban fringe and the A31.

Our client's site to the south of Cowdray Park has been submitted to the Council before through previous Calls for Sites and has been assessed in the SHELAA. It has a reference **LAA/AL-004**. We understand this site remains 'included' at this moment in time i.e., it remains open to consideration by the Council in their forthcoming Local Plan work as it is deliverable or developable. As shown by the table below, it has also been considered as part of the wider LAA/AL-056 site.

Site Reference	Site Address	Area (ha)	0 - 5 Yrs	6 -10 Yrs	11-15 Yrs	Total Capacity	Notes
<b>Alton</b>							
LAA/AL-001	208-212 London Road, Holybourne	0.25	5	0	0	5	
LAA/AL-003	St John's Works, Station Road, Alton	0.12	10	0	0	10	
LAA/AL-004	Cowdray Park, Alton	2.47	61	0	0	61	Part of LAA/AL-056

The SHELAA assessment is limited but ultimately concludes that the land is Developable. The main identified constraints are the landscape impact, the visibility from the South Downs National Park and the need for an appropriate drainage strategy.



Description
Site ref: LAA/AL-004
Site name: Cowdray Park, Alton
Site address: Cowdray Park, Alton
Parish: Alton
Promoted: Residential
Capacity: 61
Status: Included
Area: 2.47
Timescale: 0-5 years
Suitability: Significant landscape impact, site visible from SDNP. Appropriate drainage strategy required (groundwater).
Conclusion: Developable

The visual impact constraints identified in the SHELAA appear more relevant to the consideration of the site as part of a wider development to the south of Alton rather than when the site is viewed in isolation (outside of AL-035 or AL-056 which extend to 28ha and 52ha respectively and are therefore a totally different consideration).

Despite the Council's conclusion that the development of the site would have a "significant landscape impact". The submission is accompanied by a Landscape and Visual Assessment that demonstrates that, whilst there would be change, through a sensitive development being designed in accordance with the landscape consultants' recommendations a development could be prepared that would not cause adverse landscape harm. Of course, any new development will change the landscape. This should not be the determining factor. An assessment, if carried out correctly, will consider whether the benefit of developing a site outweighs and harm; harm that can include the visual impact (which is really the Council's only concern when considering the suitability of the site in the SHELAA).

Being "visible" from the National Park is not a credible reason to prevent the allocation of the site (and we debate the extent it will be visible anyway). The BIN-001 allocation to the east of Alton (for 1000 houses and associated infrastructure) will also be visible within 1.2km of the National Park yet that isn't preventing its allocation for a large development. Alton is visible from the South Downs National Park currently. It is still, at its closest point, almost 1km from the National Park. Development at that distance cannot conceivably detract sufficiently from the landscape or enjoyment of the park to merit resisting development in this location.

Our view is that the Council has taken a very simplistic approach to its consideration of where the majority of new housing in Alton should be located. It apparently comes down to development between the south of Alton and the A31 or the new urban extension to the east, breaching the A31 as a physical constraint/barrier to development. Clearly the latter has been favoured and we don't intend to consider the merits or otherwise of one of these large sites against the other. However, that should not detract from our client's site being promoted for development in isolation from the surrounding site promotions.

The site has many attributes. It would be less than 1km to the main services and facilities of the town. It would be edge of settlement and take access off Cowdray Park road which has footways, lighting etc. leading residents safely into the centre of town without the need for using the private car. Open public space is nearby to support residents' recreational needs and the site itself could further contribute to recreational provision.



## Conclusion

The Draft Local Plan, as it is currently drafted, will not deliver the target number of dwellings not least because of the over ambitious and unrealistic reliance on windfall dwellings to be delivered. There is no compelling evidence provided by the Council to justify this optimistic estimation of windfall delivery and therefore we submit that, at very least, the draft plan should be proactively planning for an additional 390 dwellings (of which 105 at least should be in Alton). If the housing target itself if changed upwards or should any of the site allocations currently being suggested fall by the wayside, then even more housing allocations will be required.

Through this submission, we reiterate that our client's site, immediately abutting the existing built up area, could reasonably be developed in this current plan period. It should be added as an allocation in the emerging local plan to make a proactive start on planning for these additional numbers. The land is deliverable in the next 5 years. It is a logical extension to the existing built up area and the road network would allow an easy extension into the site. We therefore strongly urge the Council to, as part of the necessary proactivity towards delivering housing, to allocate this land for development in the emerging local plan.

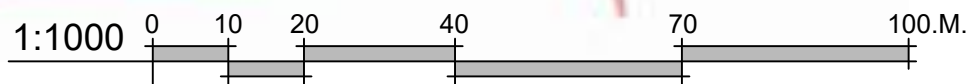
Should you wish to discuss any of the above, please contact the writer.

Yours faithfully

**BELL CORNWELL LLP**



C:\CURRENT PROJECTS\FLAVIA ESTATES\COWDRAY PARK ALTON MASTERPLAN 01



Drawn by : SD Checked by :

Date: 27/04/2018

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Revisions

Rev	Date	Drawn	Checked
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**PRELIMINARY ISSUE**

Project:  
 LAND OFF COWDRAY PARK  
 ALTON  
 HAMPSHIRE

Drawing Title:  
 MASTERPLAN

**carlton**  
 design partnership  
 Selwyn House, 32a Castle Way, Southampton, SO14 2AW  
 023 8011 8866 www.carltondesignpartnership.com

Scale: 1:1000 @ A3

Drg No: 270418/MP Rev:



bell cornwell

CHARTERED TOWN PLANNERS

01256 766673 | info@bell-cornwell.co.uk | bell-cornwell.co.uk

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

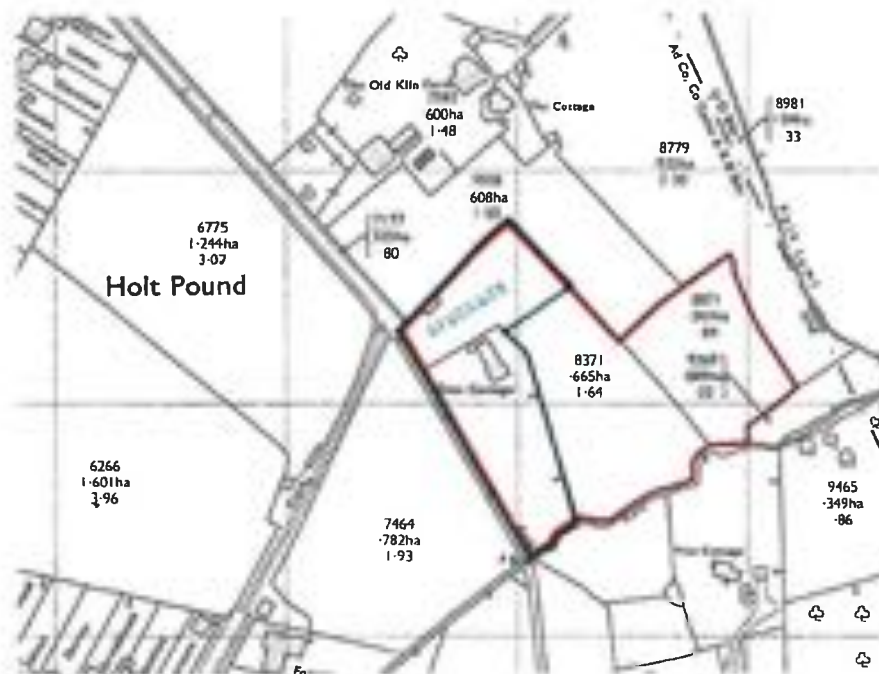
Our ref: 3902

04 March 2024

Dear Sir/Madam

**Draft Local Plan 2021-2040 (Regulation 18) – Representations. Glen Cottage, Fullers Road, Rowledge, Farnham, GU10 4LB**

We write in response to the Council's ongoing consultation on the "Draft Local Plan 2021-2040 (Regulation 18)" to provide our comments on specific behalf of [REDACTED] who own Glen Cottage, Fullers Road, Rowledge – site shown below:





These comments, whilst instructed by specific landowners are both generic (in terms of the reasoning for the consultation and its approach) but also tailored specifically to the individual clients' needs to provide a working example of our suggested approach.

This current consultation of the Draft Local Plan is at Regulation 18 stage in accordance with The Town and Country Planning (Local Planning) (England) Regulations 2012. It provides an opportunity for responding parties to shape this important document.

There is a legal requirement<sup>1</sup> for the plan to reflect both national policies set out within the National Planning Policy Framework (NPPF) and associated National Planning Practice Guidance. Furthermore, whilst applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise<sup>2</sup>, the NPPF is also a material consideration in planning decisions.

In our opinion, the key to a successful and sound local plan is how it responds to the housing delivery requirements of the area. If this is correctly addressed, then the other requirements of the plan can fall in place behind this. Reflecting this objective the Draft Local Plan, at paragraph 3.4. recognises that significantly boosting the supply of homes is a key government objective (as set out at Paragraph 60 of the NPPF). To achieve this, the plan sets out that 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 planning permission is developed without unnecessary delay.

The plan, at Policy S1 Spatial Strategy, states that over the plan period (2021-2040), the Local Plan will make provision for the delivery of at least 9,082 new homes, equivalent to 478 homes per annum. This, as explained at paragraph 3.25, as of 31 March 2023, is a minimum requirement made up of 940 net completions and 3,965 existing planning permissions. Based on the windfall allowance analysis, there is also expected to be an additional 1,320 dwellings throughout the duration of the plan period that have not specifically been identified in the Local Plan. This results in a total of 6,225 dwellings.

Our first consideration is around these windfall allowances which make up, if the Council is to proceed on this basis, 21.2% of the total housing target for the district. The NPPF (current version below, unchanged from earlier versions of the document) explains the role that windfall sites play in housing delivery. It states:

**72.** Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends. Plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area.

“**Compelling** evidence that they will provide a **reliable** source of supply”. Whilst we agree that such windfall development has the potential to assist the authority in meeting its minimum requirements,

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historically through advice and evidence of delivery, the planning system has delivered roughly 10% of its dwellings through windfalls. So, what is the **compelling** evidence that EHDC will successfully deliver 21.2% of its housing requirement through windfall sites?

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  - Of course, no new local plan should assume (or be willing to accept at any point) that it will fail to maintain the required supply of housing (a 5 year housing land supply as required by the NPPF)



and therefore there should be no reliance, in calculating the windfall delivery, on any dwelling which is delivered contrary to the development plan provisions.

On the basis of the above analysis, there is no **compelling** evidence that the suggested quantum of windfall development will be delivered or that it is a reliable source of housing supply at the level suggested. At absolute maximum should the council expect windfall delivery rates to be at 15% rather than the 21.2% predicted in the Draft Plan. If we apply this rate to the target figure of 6225 dwellings, this means that 934 dwellings (at best) will be delivered through windfalls. The Council therefore, through the emerging plan, needs to plan proactively for the delivery of **386 additional dwellings** just on the basis of the flawed windfall approach alone (we are sure other representations will be challenging the housing target more generally).

#### Housing delivery of the shortfall

Given the evident shortfall in housing delivery through the over optimistic approach to windfall housing aloe, the Council therefore needs to identify additional sites to deliver the shortfall in houses. Given rural nature of the district, that is going to be a substantial challenge if all new windfall development is to be directed within identified settlement boundaries. Some residential development will inevitably need to come from the development of rural sites and we submit that the Council should do something proactive to respond to this challenge.

We note with interest and particular relevance to these representations, that the Draft Plan is proposing a considerable site allocation at Holt Point, on the northern periphery of the District and on the edge of the greater Farnham area (Waverley Borough and Surrey County). This allocation is shown below with our clients' land shown hatched in red next to it:





## HOP1 – Land north of Fullers Road, Holt Pound

LAA Reference	BIN-005
Site Size (Ha)	3.8 ha
Existing Use	Agricultural
Proposed Future Use	Housing
Proposed Number of Homes	19

### Summary of Reasons for Inclusion

The site is relatively well-located for accessing local facilities and services in Rowledge and Wrecclesham. The site scores above average in the Local Planning Authority's Accessibility Study. Impacts on environmental constraints (flood risks, green infrastructure) could be avoided or mitigated by appropriate design and layout. Landscape concerns could be addressed through keeping northern and eastern areas free of development, whilst providing a built form that is in-keeping with residential development along Fullers Road and the A325. It would be important to avoid the perception of sub-urbanisation. Mature trees and hedgerows could be maintained and augmented to achieve a net gain in biodiversity. 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 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.

By allocating 3.8ha of land for only 19 dwellings, the Council has a clear strategy for the low density of development in the area, reflecting the nature of the surrounding development. We endorse this approach as there is capacity in the landscape to deliver such a development in a positive and sustainable way. By endorsing this approach, however, there is no reason why the same approach should not be taken in additional available land (our clients' land) in the area. There is no suggestion by the Council that a gap must be retained in the area (generally) and therefore the implication is that the low-density development of the site would retain the semi-rural (not sub-urbanised) feel of the area. Using such an approach, the site could deliver at least another 10 houses, possibly more, by including our clients' land into the site allocation where it could provide greater capacity for houses, but also where it could help contribute to the landscape and biodiversity benefits of the development.

Our clients' land has not been actively promoted through the Council's Call for Sites or through the Strategic Housing and Employment Land Availability Assessment (SHELAA) and therefore it is possible that the Council has chosen not to include it in the suggested allocation because it was unaware of its availability. We can confirm that the land is available, it is currently in single ownership and primarily in residential use currently.

In terms of constraints, the site is relatively open, occupied by the main dwelling and several outbuildings. The land slopes gradually down to the east towards the stream but is in Flood Zone 1 and not prone to flooding as shown by the extract from the Environment Agency Flood Map below. Initial ecological and tree surveys (carried out in context of recent domestic applications) suggest that there are no significant constraints from this perspective.



In terms of the landscape, the aerial photograph below demonstrates that the fields (subject to allocation BIN-005) are open, not developed and bereft of trees. By contrast, the land to the northeast, including our clients' land, is developed by several houses, large farm buildings and domestic outbuildings. The land to the north and east, beyond these buildings and beyond the arbitrary county/district boundary remains open and therefore the additional allocation cannot be reasonably resisted by Waverley Borough Council on the basis that it has control of the rural land to the north and can continue to retain the buffer between Holt Point (East Hants) part of Rowledge and the edge of Wrecclesham.





## **Conclusion**

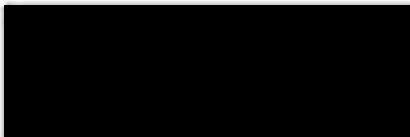
The Draft Local Plan, as it is currently drafted, will not deliver the target number of dwellings not least because of the over ambitious and unrealistic reliance on windfall dwellings to be delivered. There is no compelling evidence provided by the Council to justify this optimistic estimation of windfall delivery and therefore we submit that, at very least, the draft plan should be proactively planning for an additional 390 dwellings. If the housing target itself is changed upwards or should any of the site allocations currently being suggested fall by the wayside, then even more housing allocations will be required.

Through this submission, we are making the Council aware of additional land immediately adjoining one of the draft allocated sites which could also be developed as part of this allocation to make a proactive start on planning for these additional numbers. The land is deliverable in the next 5 years if allocated as part of the wider BIN-005 allocation. It is a logical extension to the allocation and would share the same access (currently used for the dwelling on the site) meaning the whole development could be delivered as one. We therefore strongly urge the Council to, as part of the necessary proactivity towards delivering housing, include our clients' land as part of the allocation.

Should you wish to discuss any of the above, please contact the writer.

Yours faithfully

**BELL CORNWELL LLP**



**These are the notes referred to on the following official copy**

The electronic official copy of the title plan follows this message

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H.M. LAND REGISTRY		TITLE NUMBER	
		HP423323	
ORDNANCE SURVEY PLAN REFERENCE	SU 8143	SECTION C	Scale 1/1250 Enlarged from 1/2500
COUNTY HAMPSHIRE	DISTRICT EAST HAMPSHIRE		© Crown copyright 1986



The boundaries shown in dotted lines have been plotted from the transfer plan. The site plan may be updated from later survey information.



The electronic official copy of the register follows this message.

Please note that this is the only official copy we will issue. We will not issue a paper official copy.





# Official copy of register of title

Title number HP516063

Edition date 21.07.2023

- This official copy shows the entries on the register of title on 01 MAR 2024 at 15:15:30.
- This date must be quoted as the "search from date" in any official search application based on this copy.
- The date at the beginning of an entry is the date on which the entry was made in the register.
- Issued on 01 Mar 2024.
- Under s.67 of the Land Registration Act 2002, this copy is admissible in evidence to the same extent as the original.
- This title is dealt with by HM Land Registry, Weymouth Office.

## A: Property Register

This register describes the land and estate comprised in the title.

HAMPSHIRE : EAST HAMPSHIRE

1 (03.03.1989) The Freehold land shown edged with red on the plan of the above Title filed at the Registry and being LAND ADJOINING Glen Cottage, Farnham Road, Holt Pound, Farnham (GU10 4JZ).

2 (03.03.1989) The Inclosure Award for The Parish of Binstead dated 28 January 1857 is expressed to grant rights of way and passage over adjoining land.

NOTE: Copy filed under SY596726.

3 The land edged and numbered in green on the title plan has been removed from this title and registered under the title number or numbers shown in green on the said plan.

4 The land has the benefit of the rights excepted and reserved by the Transfer dated 17 August 1989 referred to in the Charges Register.

5 The Transfer dated 17 August 1989 referred to above contains a provision as to rights of way over the driveway.

6 (05.11.1999) The land has the benefit of but is subject to the rights granted by a Deed dated 27 August 1998 made between (1) Peter D'Este Eastes and Shelagh Mary Eastes (2) Charles William Alexander Skinner and Melanie Louise Skinner and (3) Landove International Limited.

NOTE: Copy filed under HP423323.

7 (05.11.1999) Deed dated 19 May 1999 made between (1) Geoffrey Brabner Payne (2) Britannia Building Society (3) Peter D'Este Eastes and Shelagh Mary Eastes (4) Charles William Alexander Skinner and Melanie Louise Skinner and (5) Landove International Limited supplemental to the Deed dated 27 August 1998 referred to above.

NOTE: Copy filed under HP423323

Title number HP516063

## B: Proprietorship Register

This register specifies the class of title and identifies the owner. It contains any entries that affect the right of disposal.

### Title absolute

- 1 (21.03.2019) PROPRIETOR: [REDACTED]  
[REDACTED] of Land Adjoining, Glen Cottage, Fullers Road, Rowledge, Farnham GU10 4LB.
- 2 (03.01.2019) The price stated to have been paid on 3 January 2019 for the land in this title and in title HP423323 was £1,672,000.
- 3 (03.07.2023) RESTRICTION: No disposition of the registered estate by the proprietor of the registered estate or by the proprietor of any registered charge, not being a charge registered before the entry of this restriction, is to be registered without a written consent signed by the proprietor for the time being of the Charge dated 3 July 2023 in favour of National Westminster Bank PLC referred to in the Charges Register.

## C: Charges Register

This register contains any charges and other matters that affect the land.

- 1 A Transfer of the land edged and numbered SY602658 in green on the filed plan dated 17 August 1989 made between (1) Galliard Investments Limited and (2) Jacqueline Ingrid Crane contains Vendors restrictive covenants.  
  
*NOTE: Copy filed under HP423323.*
- 2 (03.07.2023) REGISTERED CHARGE dated 3 July 2023 affecting also title HP423323.
- 3 (03.07.2023) Proprietor: NATIONAL WESTMINSTER BANK PLC (Co. Regn. No. 929027) of Mortgage Centre, P.O. Box 123, Greenock PA15 1EF.

End of register

**These are the notes referred to on the following official copy**

The electronic official copy of the title plan follows this message.

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# H.M. LAND REGISTRY

TITLE NUMBER

# HP 516063



ORDNANCE SURVEY  
PLAN REFERENCE

SUB143

Scale  
1/2500

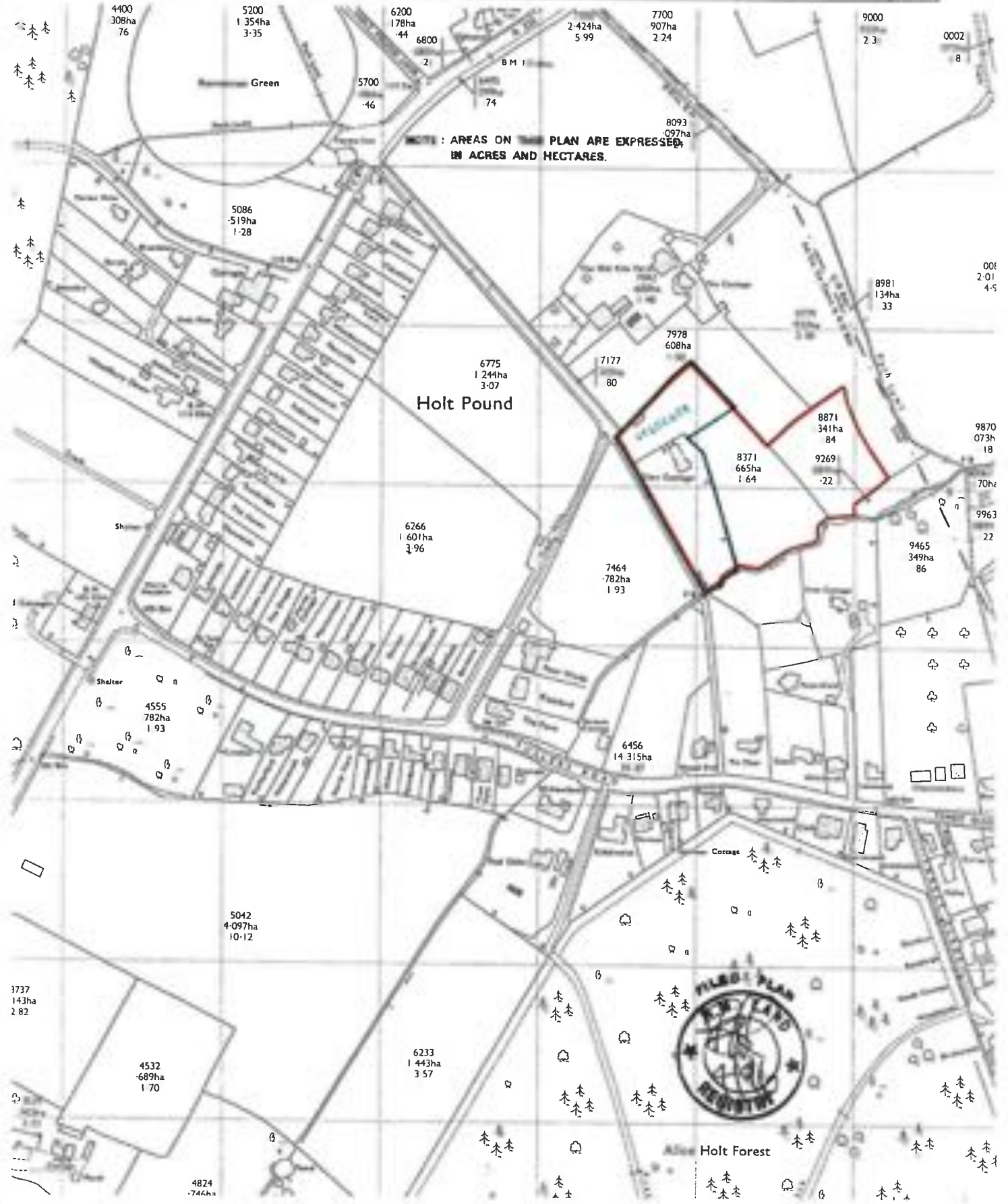
COUNTY

HAMPSHIRE

DISTRICT

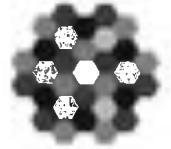
EAST HAMPSHIRE

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# Official copy of register of title

Title number HP423323

Edition date 03.07.2023

- This official copy shows the entries on the register of title on 01 MAR 2024 at 15:15:04.
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- Issued on 01 Mar 2024.
- Under s.67 of the Land Registration Act 2002, this copy is admissible in evidence to the same extent as the original.
- This title is dealt with by HM Land Registry, Weymouth Office.

## A: Property Register

This register describes the land and estate comprised in the title.

HAMPSHIRE : EAST HAMPSHIRE

- 1 (03.03.1989) The Freehold land shown edged with red on the plan of the above Title filed at the Registry and being Glen Cottage, Fullers Road, Rowledge, Farnham (GU10 4LB).
- 2 The inclosure award for the parish of Binstead dated 28 January 1857 is expressed to grant rights of way and passage over adjoining land.  
*NOTE: Copy filed under SY596726.*
- 3 The Transfer dated 17 August 1989 referred to in the Charges Register contains a provision as to light or air and rights of way over the driveway.
- 4 (05.10.1999) The land has the benefit of the rights granted by a Deed of Grant dated 27 August 1998 made between (1) Peter D'Este Eastes and Shelagh Mary Eastes (2) Charles William Alexander Skinner and Melanie Louise Skinner and (3) Landove International Limited.  
*NOTE: Copy filed.*
- 5 (05.11.1999) Deed dated 19 May 1999 made between (1) Geoffrey Brabner Payne (2) Britannia Building Society (3) Peter D'Este Eastes and Shelagh Mary Eastes (4) Charles William Alexander Skinner and Melanie Louise Skinner and (5) Landove International Limited supplemental to the Deed dated 27 August 1998 referred to above.  
*NOTE: Copy filed under HP423323.*

## B: Proprietorship Register

This register specifies the class of title and identifies the owner. It contains any entries that affect the right of disposal.

### Title absolute

- 1 (21.03.2019) PROPRIETOR: [REDACTED]  
[REDACTED] of Glen Cottage, Fullers Road, Rowledge, Farnham GU10 4LB.

Title number HP423323

## B: Proprietorship Register continued

- 2 (21.03.2019) The price stated to have been paid on 15 February 2019 for the land in this title and in HP516063 was £1,672,000.
- 3 (21.03.2019) The Transfer to the proprietor contains a covenant to observe and perform the covenants referred to in the Charges Register and of indemnity in respect thereof.
- 4 (03.07.2023) RESTRICTION: No disposition of the registered estate by the proprietor of the registered estate or by the proprietor of any registered charge, not being a charge registered before the entry of this restriction, is to be registered without a written consent signed by the proprietor for the time being of the Charge dated 3 July 2023 in favour of National Westminster Bank PLC referred to in the Charges Register.

## C: Charges Register

This register contains any charges and other matters that affect the land.

- 1 A Transfer of the land in this title dated 17 August 1989 made between (1) Galliard Investments Limited and (2) Jacqueline Ingrid Crane contains restrictive covenants.  
  
*NOTE: Copy filed.*
- 2 (03.07.2023) REGISTERED CHARGE dated 3 July 2023 affecting also title HP516063.
- 3 (03.07.2023) Proprietor: NATIONAL WESTMINSTER BANK PLC (Co. Regn. No. 929027) of Mortgage Centre, P.O. Box 123, Greenock PA15 1EF.

End of register

**From:** [REDACTED]  
**Sent:** 04 March 2024 11:04  
**To:** [EHDC - Local Plan](#)  
**Subject:** RE: Draft Local Plan 2021-2040 Reg 18 Representations - Policy NBE1  
(Redevelopment of PDL in the Countryside)  
**Attachments:** [EHDC LP Consultation March 2024.pdf](#)

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**Categories:** Consultation Responses

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

Dear Sir /Madam,

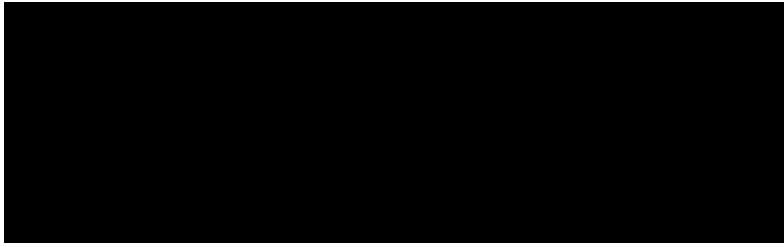
Please find attached our representation in response to the consultation to the Draft Local Plan 2021-2040 (Reg 18).

Please note that our representation relates to Policy NBE1, the redevelopment of previously development in the countryside for housing.

Do not hesitate to contact me if you would like to discuss.

Kind regards,

Ryan



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

Our ref: 2389

**29 February 2024**

Dear Sir/Madam

**Draft Local Plan 2021-2040 (Regulation 18) - Representations**

We write in response to the Council's ongoing consultation on the "Draft Local Plan 2021-2040 (Regulation 18)" to provide our comments. These comments, whilst instructed by specific landowners/developers, are both generic (in terms of the reasoning for the consultation and its approach) but also tailored specifically to the individual client's needs to provide a working example of our suggested approach.

This current consultation of the Draft Local Plan is at Regulation 18 stage in accordance with The Town and Country Planning (Local Planning) (England) Regulations 2012. It provides an opportunity for responding parties to shape this important document.

There is a legal requirement<sup>1</sup> for the plan to reflect both national policies set out within the National Planning Policy Framework (NPPF) and associated National Planning Practice Guidance. Furthermore, whilst applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise<sup>2</sup>, the NPPF is also a material consideration in planning decisions.

The Draft Local Plan, at paragraph 3.4. recognises that significantly boosting the supply of homes is a key government objective (as set out at Paragraph 60 of the NPPF). To achieve this, the plan sets out that 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 planning permission is developed without unnecessary delay.

The plan, at Policy S1 Spatial Strategy, states that over the plan period (2021-2040), the Local Plan will make provision for the delivery of at least 9,082 new homes, equivalent to 478 homes per annum. This,

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<sup>1</sup> Section 19, Subsection 2 of the Planning and Compulsory Purchase Act 2004

<sup>2</sup> Section 38(6) of the Planning and Compulsory Purchase Act 2004 and Section 70(2) of the Town and Country Planning Act 1990



as explained at paragraph 3.25, as of 31 March 2023, is a minimum requirement made up of 940 net completions and 3,965 existing planning permissions. Based on the windfall allowance analysis, there is also expected to be an additional 1,320 dwellings throughout the duration of the plan period that have not specifically been identified in the Local Plan. This results in a total of 6,225 dwellings.

It is, therefore, recognised that a significant number of dwellings will be provided by way of windfall development. We agree that such windfall development has the potential to assist the authority in meeting its minimum requirements. However, given the rural nature of the district, that is going to be a substantial challenge if all new windfall development is to be directed within identified settlement boundaries. Some residential development will inevitably need to come from the development of rural sites and we submit that the Council should do something proactive to respond to this challenge.

Of course, the current adopted development plan is The Joint Core Strategy (JCS) adopted June 2014 and The Local Plan (Part 2): Housing and Employment Allocations which was adopted on 7 April 2016 to provide greater details on, amongst others, the housing delivery requirements set out in the JCS. The Council also adopted its Housing Outside Settlement Boundaries SPD on 23<sup>rd</sup> March 2023. The purpose of the SPD is to elaborate upon Joint Core Strategy Policy CP10 in particular the latter part of the policy which refers to development outside settlement boundaries, in terms of:

- meets a community need or realises local community aspirations;
- reinforces a settlement's role and function;
- 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.

The SPD expands upon each of these four tests and sets out the council's expectations of what evidence is required to be submitted to enable the council to make a judgement as to whether to grant planning permission. The SPD clearly recognises the need for new housing to be located in the countryside which is the obvious conclusion if the current local plan allocations and the sites within settlement policy boundaries (SPBs) are not delivering sufficient housing. However, the SPD does still not reflect the Framework or provide opportunities for genuinely meeting the windfall allowance outside of settlement boundaries. This is where the obvious solution to the housing delivery problem is to enable the redevelopment of Previously Developed Land (PDL) in the countryside for housing purposes. Allowing for the development of PDL is the focus of these representations on behalf of a client with a suitable PDL site for development.

The Draft Local Plan, at Policy NBE1, sets out the following:

*'Development proposals within the countryside (the area outside settlement policy boundaries and designated Strategic Employment Sites, as defined by the Policies Map) will only be supported where they are:*

- a. meeting the proven essential need of a rural worker to live permanently at or near their place of work; or*
- b. providing business floorspace on existing employment sites and to support small scale tourism and rural enterprises (Policies E3 and E4); or*
- c. providing community facilities close to an existing settlement which is accessible by sustainable transport modes; or*
- d. providing affordable housing on rural exception sites (Policy H4); or*
- e. providing specialist housing where there is a proven local need and where this cannot be accommodated within the built-up area (Policy H5); or*



- f. providing either a replacement dwelling, an extension to an existing dwelling or the subdivision of an existing residential dwelling; or*
- g. converting previously used permanent buildings or redundant agricultural buildings for appropriate uses (Policy DM19); or*
- h. of exceptional quality or innovative design which responds to the local character and significantly enhances its immediate setting; or*
- i. for a replacement building that is not temporary in nature, provided that the proposal does not require extension or significant alterations; or*
- j. for an extension to an existing building, provided these are proportionate to the site and its surroundings; or*
- k. proposals for small scale informal recreation facilities such as interpretation centres and car parks which enable people to enjoy the countryside; or*
- l. to secure the optimal viable use of a heritage asset or appropriate enabling development to secure the future of a heritage asset (Policy NBE14); or*
- m. for traveller sites that comply with Policy H7.'*

Notwithstanding the provisions of Policy NBE1 set out above, it is only within the subtext to the policy at paragraph 5.12 that the plan suggests that *'The redevelopment of suitably previously developed land in the countryside will be encouraged provided that the proposal would not cause harm to areas of high environmental value and the proposed use and scale are appropriate to the site's rural context and setting.'*

We consider this to be a fundamental flaw in the current drafting of Policy NBE1. Why would the Council not take this opportunity to insert a provision with Policy NBE1 to explicitly encourage the development of all PDL in the countryside. We are not saying that all PDL in the countryside will be appropriate, but it should be considered appropriate if it meets the tests already referred to in paragraph 5.12 – provided the proposed redevelopment of suitable PDL land in the countryside would not cause harm to areas of high environmental value and the proposed use and scale are appropriate to the site's rural context and setting.

The re-use of PDL is fundamental to the requirements to deliver sustainable development (the economic role requires the use of the right type of land) and the housing need, affordable housing, visual impact and impact on the highway network are all contributing factors to sustainable development. It provides a visual and practical starting point which must, in planning terms, be preferable to developing on greenfield land.

This ties in with the current policy CP19 which specifically states that "The only development allowed in the countryside will be that with a genuine and proven need for a countryside location", a fulfilled test given the need for housing requires a proactive approach towards residential development in the countryside. The suggested approach to CP10 (above) in positively supporting the development of previously developed land in the countryside could therefore be justified under the provisions of CP19.

Therefore, the drafting of Policy NBE1 in its current form clearly does little to 'encourage' the redevelopment of suitably previously developed land in the countryside. Furthermore, it must be recognised that '**suitably** previously developed land' is a nonsense statement. Land is either previously developed land as defined within Annexe 2 of the NPPF or it is not. The Framework defines PDL as follows:

*'Previously developed land: Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal*



*by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.'*

Land either meets this definition, is explicitly excluded, or fails to meet the definition. It cannot be suitably or unsuitably previously developed land.

The approach to encourage the redevelopment of previously developed land in the countryside is reflected in the Framework. Paragraph 123 of the NPPF states that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously developed or 'brownfield' land.

Paragraph 89 of the NPPF recognises that PDL should not only be used for housing but also to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances the NPPF states that it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport). The NPPF is clear that the use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist.

In light of the above, the Council can, and should, adopt the approach of its two Hampshire neighbours, Hart District Council (HDC) and Basingstoke and Deane Borough Council (BDBC) which both have usable policies which support development of PDL in the countryside without opening it up for all sites to be supported. HDC's policy (NBE1) allows for:

**Policy NBE1 Development in the Countryside**

**Development proposals within the countryside (the area outside settlement policy boundaries and designated Strategic and Locally Important Employment Sites, as defined by the Policies Map) will only be supported where they are:**

- j) located on suitable previously developed land appropriate for the proposed use; or**

BDBC's policy is more prescriptive and states:

**Development proposals for new housing outside of Settlement Policy Boundaries will only be permitted where they are:**

- a) On 'previously developed land', provided that:**
  - i) They do not result in an isolated form of development; and**
  - ii) The site is not of high environmental value; and**
  - iii) The proposed use and scale of development is appropriate to the site's context;**

It is a peculiar situation where 2 neighbouring authorities realise and support development of PDL in the countryside whilst EHDC completely overlook it/ignore it as an option. Given HDC's local plan (2020) and



the BDBC local plan (2016) have been adopted since EHDC adopted their development plan, this suggests that the other two authorities have the correct approach to developing PDL which is consistent with the up-to-date NPPF requirements of delivering sustainable development and making best use of the available land. Even the accessibility arm of Sustainable development is satisfied given that most (if not all) PDL will already attract vehicle trips. Often the redevelopment for housing can reduce vehicle trips overall and therefore improve on the sustainability credentials of a site.

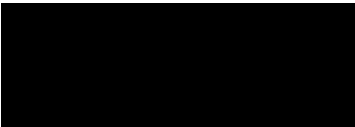
### **Conclusion**

The Draft Local Plan, as it is currently drafted, clearly does little to 'encourage' the redevelopment of suitably previously developed land in the countryside. It will not assist in any way to redevelop PDL or deliver the required development in the countryside. We have provided clear narrative and explanation of how Policy NBE1 can be worded, to reflect the Framework and the Local Plans of neighbouring Hampshire authorities, to be a useful document and, if it is the genuine aim of the Council, demonstrate within the context of the existing development plan policies how new housing can be delivered in the countryside.

We urge the Council to use this opportunity provide policy that would genuinely encourage the redevelopment of PDL in the countryside and meet the Council's identified windfall allowance. Significant amendments are required and then a further consultation should be carried out.

Should you wish to discuss any of the above, please contact the writer.

Yours faithfully  
**BELL CORNWELL LLP**





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

Our ref: 9199

**05 March 2024**

Dear Sir/Madam

**Draft Local Plan 2021-2040 (Regulation 18) – Representations. Land at Snode Hill, Beech**

We write in response to the Council’s ongoing consultation on the “Draft Local Plan 2021-2040 (Regulation 18)” to provide our comments on specific behalf of Flavia Estates. These comments are with direct reference to land at Snode Hill, Beech as shown in red on the site location plan extract below (the area which is to be removed from the settlement boundary) and the wider area of Snode Hill to the north of the red line site:





These comments, whilst instructed by specific client and with a specific site in mind are both generic (in terms of the reasoning for the consultation and its approach) but also tailored specifically to the individual client's needs to provide a working example of our suggested approach. We have, through other representations on behalf of the same client (in respect of Cowdray Park, Alton), already challenged the draft plan on the basis that the approach to windfall development is flawed and undermines the whole strategic approach of the local plan. We will not reiterate these points here, focusing instead on how some flexibility towards development in the countryside is needed if the Council is to deliver its suggested housing number (or, as we suspect, respond to higher numbers of houses as the housing numbers are further examined).

There is a legal requirement<sup>1</sup> for the plan to reflect both national policies set out within the National Planning Policy Framework (NPPF) and associated National Planning Practice Guidance. Furthermore, whilst applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise<sup>2</sup>, the NPPF is also a material consideration in planning decisions.

In our opinion, the key to a successful and sound local plan is how it responds to the housing delivery requirements of the area. If this is correctly addressed, then the other requirements of the plan can fall in place behind this. Reflecting this objective the Draft Local Plan, at paragraph 3.4. recognises that significantly boosting the supply of homes is a key government objective (as set out at Paragraph 60 of the NPPF). To achieve this, the plan sets out that 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 planning permission is developed without unnecessary delay.

### **Housing delivery of the shortfall**

Given rural nature of the district, there is an obvious challenge to balance the need for new housing vs the need to protect the countryside. However, as the draft plan is currently drafted, there is a very one sided and negative approach to the delivery of houses in the countryside. This is contrary to the advice of paragraph 83 of the NPPF which positively and proactively identifies the need to help rural communities through the delivery of more housing:

- 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.**

Paragraph 84 of the NPPF is clear that planning policies should avoid *isolated* new houses in the countryside. Isolation is defined in the Braintree case of 2018<sup>3</sup> with the two important conclusions of the case being:

- “... a dwelling that is physically separate or remote from a settlement. Whether a proposed new dwelling is, or is not, ‘isolated’ in this sense will be a matter of fact and planning judgment for the decision-maker in the particular circumstances of the case in hand” at [31].

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<sup>1</sup> Section 19, Subsection 2 of the Planning and Compulsory Purchase Act 2004

<sup>2</sup> Section 38(6) of the Planning and Compulsory Purchase Act 2004 and Section 70(2) of the Town and Country Planning Act 1990

<sup>3</sup> Braintree DC v SSCLG [2018] EWCA Civ. 610



- “Whether, in a particular case, a group of dwellings constitutes a settlement, or a ‘village’, for the purposes of the policy will again be a matter of fact and planning judgment for the decision-maker” [32]

So, what is a settlement in this sense? The draft local plan endeavours to draw settlement boundaries around settlements with a very black and white approach that within a settlement boundary, new housing is in principle acceptable (SS2) whilst outside the boundary it is not (NBE1). The draft plan reviews existing settlement boundaries and, in Beech’s case, removes two small pockets of development from the settlement and adds one on the western end. Our client’s land, arrowed below, is removed from the settlement boundary.



The Interim Settlement Policy Boundary Review Background Paper January 2024 draws on evidence and consultations which are now 6 years old, and which, by the time this draft plan is adopted, will be 8 years plus old. This is detailed below:

- 5.2 In regard to the proposed changes outlined as a result of this background paper (as shown in Appendix B and on the [interactive map](#)) the following stages have taken place so far:
- EHDC produced an interim Settlement Hierarchy Background Paper to determine what settlements should require a settlement policy boundary (December 2018). This document was subsequently updated in January 2024.
  - An initial review of all settlement policy boundaries was conducted, and an Interim Methodology Paper produced (December 2018).
  - EHDC consults the public on proposals for boundary adjustments as part of the first Regulation 18 Draft Local Plan (early 2019).
  - Following consultation feedback, EHDC make amendments to the proposed settlement policy boundaries where it is considered appropriate to do so.





This is not up to date evidence and it is not a review that has been carried out in the context of either the most up to date NPPF for this consultation or in the context of the housing numbers required through this current plan. Of relevance to our client's site in particular, there are two responses in the Review which explain both why the site has been removed from the settlement boundary and why the boundary hasn't been extended further in the east of Beech rather than reduced.

Firstly, in context of the site and its removal from the settlement boundary, the following explanation is provided.

23753	There is no justification for removing land to the east of Beech from the SPB.	Comment noted. It is considered that 20 Medstead Road is isolated development which is physically or visually detached from the settlement (Principle 3b). The area of woodland relates more to the open countryside than the built form (Principle 3h).
-------	--	--

How can a site, whether it is woodland or not, which is surrounded on three sides by residential land relate more to "open countryside" than the built form? This is factually incorrect and unsubstantiated as though the Council is trying to shoehorn in an argument to justify its position. This does not provide any justification for the removal of the site from the settlement boundary. On the contrary, we believe that the Council should take this opportunity to extend the settlement boundary to the east of Beech rather than to reduce it. This suggestion has already been offered forward with the Council's response below.

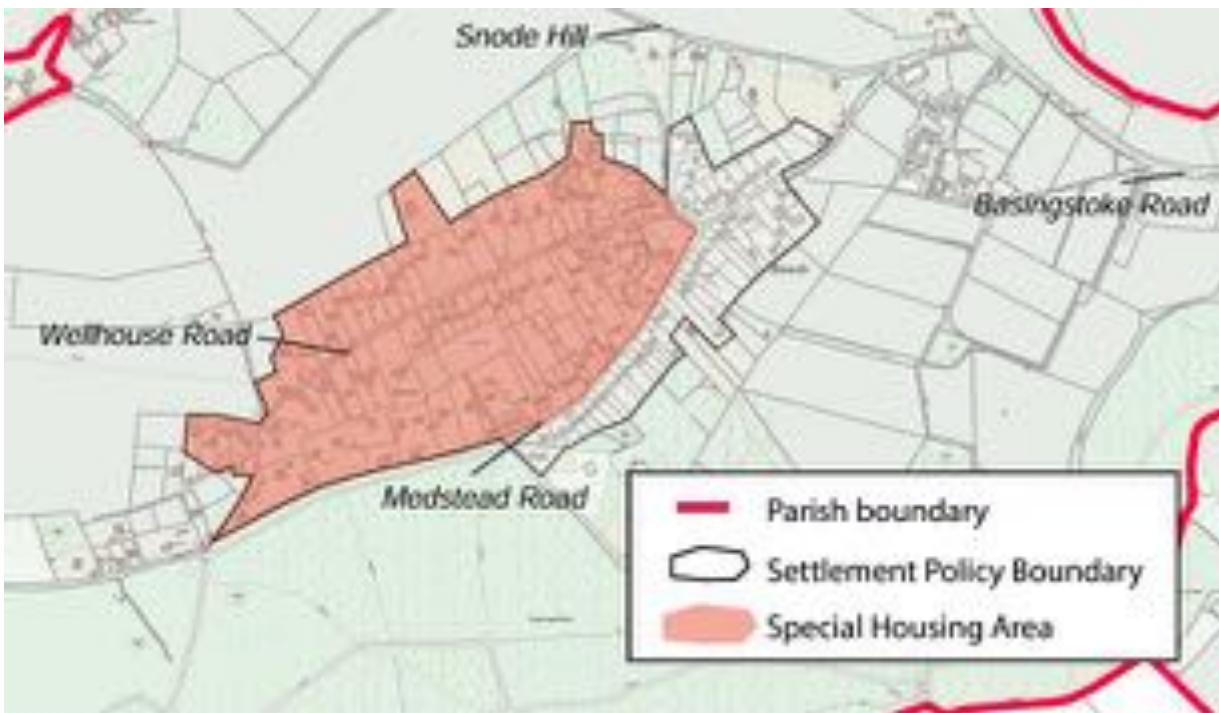
23786	The Beech SPB no longer reflect the inhabited area in Beech. The Neighbourhood Planning Group has suggested an extension of the SPB by covering Kings Hill and Snode Hill settlements. This proposal would have resulted in a maximum of a further 10 infill plots an increase in properties which Beech can easily absorb without affecting its environment or amenities. It is a pity EHDC does not redraw the SPB to include the larger settlements and more clearly define the 'countryside'.	Kings Hill has an identity as a separate settlement or hamlet and therefore does not align with Principal 4. Due to the lack of services and facilities, Kings Hill is not designated in the proposed Settlement Hierarchy for the emerging Local Plan. Whilst not identified as a separate settlement, the dwellings on Snode Hill do not meet the other criteria associated with Principle 4 as there are less than 20 dwellings and have exceptionally large residential plots.
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Again, this is illogical. Given that Beech is a sprawling settlement of detached houses in different size plots (and, as per the text above, Snode Hill is not a "separate settlement" from the rest of Beech), why would the Council choose to consider this pocket of development in isolation to make sure it falls below an arbitrary 20-unit threshold? To coin the same term as before, again this is a bad case of shoehorning an argument into a policy.

The aerial photograph below shows (red dots) the residential properties in this area and tell the tale of the residential nature of the area at the eastern end of Beech. Why then shouldn't it be suitable for more infill development to reflect the residential character rather than be an anomaly as an exclusion to the Beech settlement boundary?



We note from the Beech Neighbourhood Plan that the residential area to the east of the village is outside the “Special Housing Area” and therefore has fewer defining characteristics. Surely this, therefore, makes the area **more** suitable for additional residential development rather than **less** suitable? The Special Housing Area policies (BPC06 of the Beech Neighbourhood Plan and H10 of the EHDC Local Plan 2<sup>nd</sup> Review 2006) identifies plot sizes of 0.2ha as the prevailing requirement. Why not include all of Beech within the settlement boundary and subject to a similar policy restriction which will ensure that all development conforms to these prevailing characteristics?



On this basis, we believe that the Beech Settlement boundary should be increased in size to incorporate the dwellings around Snode Hill rather than reduced in size to remove the subject site with no logical



explanation provided. Should the Council insist on there being no settlement boundary around this part of Beech then, as required by paragraph 83 of the NPPF, there should be more flexibility in the policies for land outside of settlement boundaries when they site relates well to the settlement.

The planning system should be proactive rather than restrictive and such a policy finds the balance between housing delivery, supporting rural communities and protecting the countryside. We note the wording of policy S2.3 below which makes little sense.

**S2.3 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.

Either there is a presumption in favour of sustainable development within the SPB or there is not. It is not something that should be reviewed through further development plan documents and/or neighbourhood plans (the latter of which are, ironically, part of the development plan too). Both of these would be tested for consistency against this draft plan and therefore, if their approach was inconsistent, then the subsequent development plan document would not be sound in their approach. Whilst this wording may be interpreted as allowing more flexibility in the future, generally when planning policies are left for drafting at local level (Neighbourhood Plans, for example) they are less flexible and more aimed at preventing rather than delivering development.

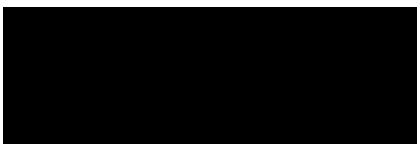
The wording of S2.3 insinuates that the policies, as drafted, are not fit for purpose; effectively pushing the difficult decisions further down the line to other development documents which may or may not happen or to Neighbourhood Plans which, all evidence suggests, will be more negative towards development than positive. This is the time for the Council to be proactive in its approach and to stop stifling development which the draft local plan is clearly geared towards doing.

### **Conclusion**

We have little doubt that the Draft Local Plan, as it is currently drafted, will not deliver the target number of dwellings not least because of the over ambitious and unrealistic reliance on windfall dwellings to be delivered. The draft plan fails to respond to the requirements of paragraph 83 of the NPPF and instead takes a negative and restrictive approach to development in the Countryside. Beech is a unique settlement in East Hampshire because of its sprawling nature, linear form and low density of development. Rather than compress the settlement boundary, it should include the whole of the village and, if deemed necessary, density restrictions as per the 2006 local plan and the Neighbourhood Plan can be put in place.

Should you wish to discuss any of the above, please contact the writer.

Yours faithfully  
**BELL CORNWELL LLP**



**Local Plan Representations  
Response to East Hampshire District Council  
Local Plan 2021-2040 Regulation 18  
Consultation  
Land south of Drift Road, Clanfield**

March 2024

**Turley**

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**Client**

Bellway Homes Ltd (Wessex Division)

**Our reference**

BELS3017

1 March 2024

# 1. Introduction

- 1.1 These representations have been prepared to respond to the East Hampshire Local Plan 2021-2040 Issues and Priorities Regulation 18 – Part 2 consultation on behalf of our client Bellway Homes Ltd (Wessex).

## **Purpose of these Representations**

- 1.2 East Hampshire District Council (hereafter referred to as ‘the Council’) are preparing a new Local Plan ‘Better Homes, Better Places’ and are undertaking a Regulation 18 consultation (hereafter referred to as ‘the Reg 18 Plan’) to seek views on the main issues that the plan will need to address.
- 1.3 Our client has land interests to the Land South of Drift Road, Clanfield (hereafter referred to as ‘the Site’). The Site offers significant potential to deliver a beautiful and highly sustainable residential development to meet extensive housing needs, alongside associated community benefits. These representations highlight that the Site remains available, deliverable and developable as highlighted in our previous representations.
- 1.4 It is noted that part of the Site is proposed for allocation within the Plan for 80 homes (Policy CFD2). This is welcomed and fully supported. It is however considered that this represents a missed opportunity in terms of the additional benefits that could be delivered through a larger scheme, including provision of land for a new GP surgery. The focus of these representations is to highlight the opportunities for an extended allocation, as well as commenting on matters of deliverability and the Council’s evidence base and broader development management policies. We reserve the opportunity to make specific comments on matters of soundness at a later stage if it is necessary to do so.
- 1.5 One of the key points arising from these representations relates to the quantum of development to be delivered in accordance with Policy CFD2 and the Council’s indications as to where new residential development would be acceptable within the Site. As these representations explain, we consider that the Council should seek to make efficient use of the land given that it is proposed to be allocated.
- 1.6 These representations are supported by:
- a Framework Masterplan (Appendix 1) produced by Turley; and
  - a Landscape and Visual Appraisal (Appendix 2) produced by Pegasus Group, which outlines the main landscape constraints and assesses the development potential of the site in landscape terms

## 2. Site Overview

- 2.1 This section provides context to the Site in relation to which our client has a contractual agreement in place with the landowner.

### Land South of Drift Road Clanfield

- 2.2 The Site is located to the south-west of the main built-up area of Clanfield, immediately adjacent to the settlement policy boundary as defined within the Local Plan (Part 2): Housing and Employment Allocations (hereafter referred as 'the adopted Plan'). The Site is currently used for arable farming.
- 2.3 The Site is bound to the north by Drift Road; to the east by a neighbourhood centre containing a Co-Op convenience store and integrated post office, a GP surgery and a church accessed via large car park adjacent to White Dirt Lane, and by residential development at Godwin Close; to the south also by White Dirt Lane, along with an existing dwelling and storage building accessed via Glamorgan Road and other agricultural fields; and to the west by agricultural fields and ancillary agricultural buildings, accessed via Downhouse Road.
- 2.4 The neighbourhood centre is identified as a 'Local Centre' under Policy CP8 of the adopted Core Strategy, where proposals for new retail, leisure, entertainment and cultural facilities in the centres will be permitted in principle. Similarly, Policy E5 of the Reg 18 Plan identifies Clanfield as a 'Local Centre', where main town centre uses, as defined in the NPPF, will be permitted.
- 2.5 The Site's boundaries themselves comprise a mix of trees, hedges, low lying shrubs and other vegetation. The Site is visible from adjacent roads including Drift Road and White Dirt Lane.
- 2.6 The Site does not benefit from a formal access point onto the local road network but is located adjacent to both Drift Road and White Dirt Lane which could provide potential points of vehicular and pedestrian access.
- 2.7 The Site is subject to the following constraints and opportunities:
- The Site is located in Flood Zone 1 according to the Government's flood risk map for planning and is therefore considered to be at low risk of fluvial flooding. The Site is also considered to be at very low risk from surface water flooding. There are however areas of low risk to the north of the Site on Drift Road and areas varying from low to high risk to the east of the Site on White Dirt Lane.
  - The Site is itself not subject to any international or national designations for biodiversity value according to DEFRA's Magic website. However, the Site is located approximately 1 kilometre to the north-east of the Catherington Down Site of Special Scientific Interest (SSSI) and Local Nature Reserve (LNR) and 900 metres to the northeast of the Catherington Lith LNR.

- The Site is not the subject of any national heritage asset designations according to Historic England’s website. The site is not within the setting of any heritage assets.
- The Site and its boundaries are not the subject of any Tree Preservation Order (TPO).
- There is a Public Right of Way (Route Number: 119/49/1), designated as a footpath, running across the north-east corner of the Site, linking Drift Road to White Dirt Lane.

## Surrounding Area

- 2.8 In terms of the Site’s wider area, to the north and east are the built-up area of Clanfield which is mainly residential in character. A number of local services are located within the small neighbourhood centre and elsewhere near to the roundabout connecting Drift Road with White Dirt Lane to the immediate north-east of the Site. In addition to those already mentioned immediately adjacent to the Site within the small neighbourhood centre, there are also several local retail units, restaurants and cafes as well as a pharmacy, opticians and another convenience store. All are within short walking distance.
- 2.9 Petersgate Infant School is located approximately 250 metres (8-minute walk) to the north-east of the Site whilst the Clanfield Community Centre is located approximately 650 metres to the north-east. Clanfield Junior School is located approximately 1 kilometre to the north-west of the Site. The nearest secondary school is Horndean Technology College located approximately 2.3 kilometres to the south of the Site in Horndean.
- 2.10 The wider area to the south and west comprises agricultural fields, farm buildings, a nursery, beyond which are linear arrangements of housing along Downhouse Road and Glamorgan Road.
- 2.11 Clanfield is located adjacent to the A3 and so the Site benefits from good access to the Strategic Road Network including the A3 and nearby A3(M) which provide onward connections to Guildford and London to the north and Havant, Waterlooville and Portsmouth to the south with onward connections to Southampton via the M27.
- 2.12 With regards to public transport there are bus stops located adjacent to the Site on Drift Road. Service 8 departs from Drift Road and provides direct connection into Portsmouth every 20-minutes. There are also services 37, 37x and 637. These allow for direct access into Petersfield to the north and Waterlooville to the south with services roughly every hour.
- 2.13 The nearest train stations are those at Bedhampton, Havant and Petersfield which are served by regular trains to London and Portsmouth and other local and regional destinations.
- 2.14 The Site is located in a wider landscape of rolling hills. The Site rises from a low point of around 90 metres AOD on the eastern boundary closest to the neighbourhood centre,



up to a ridge of around 120 metres AOD on the south-western part of the Site, forming part of a wider plateau whilst falling away to around 110 metres AOD to the north-west.

- 2.15 There are two electricity pylons located close to the southern edge of the Site which connect high voltage cables running east to west across the Site.

### **Planning History**

- 2.16 Based on the information available from EHDC's online planning portal there is no planning history for the Site.
- 2.17 It should be noted that EHDC's online planning portal only includes planning records dating back to 2000. Any records from before this will need to be obtained directly from EHDC.

### 3. Suitability of the Site for Development

- 3.1 This section should be read in conjunction with the attached Framework Masterplan at Appendix 1 and the Vision Document submitted with previous Part 1 representations which provides more related details and visual supporting material, including technical matters such as drainage and utilities.

#### Highly Sustainable Location

- 3.2 The Site is well located to local services and public transport and is within a very short walking distance of a number of facilities and services at the adjacent neighbourhood centre. There is direct access to frequent bus services connecting with more extensive facilities and services in Horndean, Waterlooville and Portsmouth.
- 3.3 This level of locational sustainability is likely to maximise the opportunity for the use of non-car transport modes as part of any future development and is a considerable benefit to identifying the Site as an allocation for residential development.

#### Provision of Market and Affordable Housing

- 3.4 The wider Site being promoted provides the opportunity for residential development of approximately 280 homes over a site area of 24.6 ha to respond to local housing needs. This level of provision is considered consistent with the role of Clanfield within the settlement hierarchy and its highly sustainable location adjacent to facilities and services.
- 3.5 In the adopted Local Plan, Clanfield is identified as a Small Local Service Centre that will continue to need to deliver housing in line with its role in the settlement hierarchy, as well as taking account its location within the southern parishes forming part of the wider Planning for South Hampshire (PfSH) region, where there is a role in meeting wider needs This is reflected by the housing allocations for the village in both the adopted Local Plan and the draft allocations in the emerging Local Plan.
- 3.6 Subject to other considerations and Council priorities, it is intended that affordable housing will be proposed in line with Planning Policy, with current policy requirements indicating 40% provision, equating to 32 affordable homes based on the draft allocation (CFD2) or up to 112 affordable homes if a larger allocation of 280 homes were pursued. The location of affordable housing can be evenly distributed across the development. The Site offers a significant opportunity to contribute more towards addressing the acute affordable needs of the area.
- 3.7 This acute need is emphasised within the Reg 18 Plan. East Hampshire is recognised as being *'extremely unaffordable, so affordable housing needs are extremely important'*. Analysis shows a total need for 613 affordable homes across East Hampshire per year, equating to 97% of the standard method local housing need figure (632).
- 3.8 It is noted that the Reg 18 Plan acknowledges that *'census projections highlight a growing proportion of people over 65 years in the district'*, and that *'this has implications for the type of housing that needs to be provided through the Local Plan.'*

The provision of lower density housing toward the higher parts of the Site also offers the potential to provide accommodation suitable for older persons and/or people with physical disabilities in the form of bungalows.

## Landscape

- 3.9 The primary constraints for the Site are its location in the Settlement Gap (the 'Gap') for Horndean, Catherington and Clanfield (Policy 23 of the adopted Plan), and its wider landscape setting in an area of rolling hills in close proximity to the boundaries of the South Downs National Park.
- 3.10 Bellway Homes Ltd have commissioned specialist landscape consultants Pegasus to provide landscape advice in relation to the Site and this is formed in the Landscape and Visual Appraisal included in Appendix 2 of these representations. This has considered key public vantage points and the topography of the site as well as the wider locality and how it could be developed to maintain the separate visual identity of Horndean, Catherington and Clanfield.
- 3.11 The Landscape Visual Appraisal highlights that the Site is well enclosed compared to other areas in the locality. The Landscape and Visual Appraisal highlights that the topography of the site means that people currently using the existing PRoW on the site would have *"no visibility or appreciation of the wider settlements of Horndean and Catherington... [and] the development would not change the scenario at this location. The perceived visual gap between Clanfield and nearby settlements would be retained."*
- 3.12 In terms of impacts on the South Downs National Park, there is a buffer of residential development at Downhouse Road and while the Site is partially visible to the east and west, development can be designed to avoid potential impacts through appropriate building heights and containing development on the lower slopes.
- 3.13 The appraisal is accompanied by a Framework Masterplan which shows that a robust design strategy can safeguard the aims of the Gap to maintain the open character and appearance of the countryside between settlements and the individual identity of towns and villages. This can be secured through restricting development to the lower eastern slopes and ridgeline to the west. This would limit wider views of the site, in particular views from Hinton Manor Lane. To demonstrate how the development could be accommodated on the Site set within a robust and well considered landscape framework the following design parameters and landscape mitigation measures have been incorporated into the proposals:
- *Containing development to the eastern slopes of the site to appear continuous with the urban edge and settlement pattern of Clanfield;*
  - *Retaining the broad ridgeline or saddle of higher ground to the west as arable farmland or public open space to maintain the local gap between Clanfield and Catherington;*

- *Extending the residential parcels around the 105 metre AOD contour approximately at No. 73a Drift Road – this would ensure that a single storey property would not be visible above the ridgeline to the west to visually maintain the local gap;*
- *Enclosing the residential parcels on the lower slopes and urban edge with a woodland buffer to maintain a physical and visual gap between Clanfield and Catherington villages, provide a robust and defensible edge, and to mitigate the visual effects from Horndean Down / Windmill Hill within the National Park in line with the landscape management considerations for the host landscape area;*
- *Provision of SuDS attenuation basins on the lower ground to create a village pond and attractive settlement gateway leading into the development;*
- *Enhancements to green infrastructure including the creation an informal public open space, country park and play area on the higher ridgeline to provide views towards Windmill Hill to the east of the site; and*
- *Provision of informal footpaths and green links through development between the hilltop parkland and the local centre to improve accessibility across the site which is currently private land.*

3.14 This indicates that in terms of a developable area development can be accommodated further to the north and east relative to the proposed allocation This is reflected in the extent of developable area, land use disposition and consequent overall capacity of the site identified in the Framework Masterplan within Appendix 1.

3.15 The Framework Masterplan is based around a comprehensive landscape scheme to ensure that it is sensitively designed around the landscape characteristics of the wider area. To this effect, there is the potential to incorporate the existing PRoW within the green infrastructure of the proposals, restore existing hedgerow boundaries to provide visual unity (as well as promote biodiversity net gains) and incorporate a woodland buffer edge to the proposals. The appraisal highlights that the woodland buffer would create a defensible edge to the built form and soften the edges of the development over time, as well as providing opportunities for an extended circular walking route.

### **Public Open Space**

3.16 The higher parts of the site to the west close to the ridgeline, and adjacent to White Dirt Lane to the south, would provide a significant area of public open space in excess of 6.5 hectares. This responds to a recognised deficiency in Clanfield and the wider southern parishes in both the quantity and quality of open space provision, as set out within the Open Space, Sport and Recreation Needs and Opportunities Assessment 2018 to 2028. This could include a community orchard and small picnic area.

3.17 Such provision would be of benefit to existing and future residents, and as dedicated public open space offer longer term security in maintaining separation. This aligns with the Plan’s Vision for healthy, accessible and inclusive communities, along with Policy HWC1’s aim for developments to contribute to healthy and active lifestyles.

## **Flood Risk / Drainage**

- 3.18 The Site is located in Flood Zone 1 and is therefore considered to be at low risk of fluvial flooding. The Site is also considered to be at very low risk from surface water flooding. There are however areas of low risk to the north of the Site on Drift Road and areas varying from low to high risk to the east of the Site on White Dirt Lane. The development of the site would incorporate a sustainable urban drainage system to provide surface water drainage improvements.

## **Ecology/Bio-Diversity Net Gain**

- 3.19 Ecological surveys have been undertaken and shown that the existing boundary trees and hedges provide suitable habitats for protected species. These will be retained, with the exception of some limited removal to provide access. The extensive open space and woodland proposed offer significant opportunities to enhance ecological habitat, as would the use of Sustainable urban drainage basins with semi-permanent water to deal with surface water mitigation.
- 3.20 As such, the proposals will enable the delivery of at least 10% bio-diversity net gain on site.

## **Design and Density**

- 3.21 Overall, the development would be of a high-quality design and would integrate into the surrounding area, utilising local vernacular and materials. The proposed dwellings would be designed to Nationally Described Space Standards. In terms of density, the Framework Masterplan highlights that the proposed residential development would be of a density appropriate to the character of the surrounding area. The overall density will vary within the site, with higher density development being located among the primary routes. Lower density development would be located towards the edges of the site to the west to create a transitional edge between the development and the landscaped open space.
- 3.22 In terms of heights, the proposed development includes a range of heights with buildings to the east being 1.5-2.5 storeys in height, with this reducing down to 1-1.5 storeys as the site transitions towards the public open space and higher parts of the site to the west.

## **Transport**

- 3.23 As detailed in our previous representations, a highways consultant has undertaken initial feasibility studies which demonstrate that safe access and egress to the site can be provided from Drift Road and that there would be no adverse impact on the capacity of the wider highway network. There is also an opportunity for a secondary/emergency access point to be taken from White Dirt Lane.
- 3.24 The existing PRoW that enters the site from White Dirt Lane and connects to Drift Road can be incorporated into the proposals as an attractive green route and will help to create a scheme with an integrated and permeable masterplan in terms of walking and/or cycling.

- 3.25 Any development of the site will include a travel plan to encourage future residents to use sustainable transport methods instead of relying on private cars. Initial technical work has indicated that the proposals can be accommodated without adverse harm to the capacity of the local road network. However, if there is evidence that some upgrading of the network to accommodate the development was necessary then this could be secured through S106 contributions.

### **Trees**

- 3.26 Existing boundary vegetation and trees are to be retained and supplemented by extensive additional planting, particularly as part of the overall landscape strategy to mitigate wider landscape impacts. In addition, supplementary planting including street trees would be proposed within the residential development.

## 4. Response to Local Plan Consultation

### Managing Future Development

#### Policy S1: Spatial Strategy

- 4.1 Our client notes the housing requirement of 464 dpa and understand from the Council's Technical Note on housing needs that this is derived from the Standard Method Figure of 578 dpa and that this need is split with the South Downs National Park Authority, whom the Council indicates would take on 114 dpa of this need. We agree that there is no evidence to point to any reduction in the housing need using the 2014-based projections and there are no exceptional circumstances to justify a lower level. Further commentary is included below on unmet needs in neighbouring authorities.

#### Policy S2: Settlement Hierarchy

- 4.2 We note that the draft plan identifies Clanfield as being a Tier 3 settlement. While the policy itself does not define what a Tier 3 settlement is, paragraph 3.38 of the supporting text states *"Outside of these areas, 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 sustainable locations."*
- 4.3 While the Tier 3 settlement classification is equivalent to the same classification in adopted the Local Plan (Small Local Service Centre), this is a lower level than was identified in the Issues and Options Consultation in 2022.
- 4.4 The Council's Revised Settlement Hierarchy Background Paper 2024 does not appear to have substantially changed the sustainability scoring for Clanfield, however we note that the number of 'tiers' from the Issues and Options has increased from 4 to 5, and this appears to have impacted Clanfield's position within the Settlement Hierarchy. Clanfield is now within the same hierarchy as settlements such as Rowlands Castle, Headley, Bentley and Holt Pound. These settlements have much less extensive facilities and services relative to Clanfield but have increased sustainability scores.
- 4.5 We note that Figure 3 of the Revised Settlement Hierarchy Background Paper shows that the accessibility ranking of Clanfield has not changed since the 2022 assessment and remains a sustainable location for housing growth. We are therefore concerned that Clanfield has been 'downgraded' in the Settlement Hierarchy despite ranking the same in terms of accessibility.
- 4.6 The Council should review whether the assumptions in the Revised Settlement Hierarchy Background Paper on Clanfield are correct and whether it could be considered to be a Tier 2 settlement. Alternatively, given that the accessibility scoring of Clanfield has not changed since the previous assessment, the Council should consider whether Tier 3 settlements of a similar scoring to Clanfield could accommodate additional growth than what has been assumed as part of this consultation.

- 4.7 While there is some relationship between the Settlement Hierarchy and the quantum of development that can be accommodated provided within a settlement, it is reasonable to give weight to the sustainability of specific sites and their capacity to accommodate development. To this effect, the site is located adjacent to a local centre and public transport links and is therefore highly suitable for residential development of the scale proposed.

## Responding to the Climate Emergency

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

- 4.8 Although we do not have any specific comments to make on this policy, we are concerned that these standards are significantly beyond existing building regulations and the Future Homes Standards that are due to come into force in 2025. While there is an allowance for viability within this policy, we question the practicality of these standards in terms of delivering the amount of market and affordable housing to address the Council's needs. In particular, the requirement for developments to generate at least the same amount of renewable energy on site as their annual electricity demand. This may restrict the net developable area of sites to incorporate additional infrastructure to meet this renewable energy requirement, and therefore have a negative impact on the deliverability of housing in the District.

- 4.9 In order for the Local Plan to be found sound when it comes to Examination it is essential that any requirements that go beyond current or planned building regulations are well-reasoned and include a robustly costed rationale that ensures development remains viable and that the impact on housing supply and affordability is considered in accordance with the NPPF. This position is highlighted within Housing Minister Lee Rowley's Written Ministerial Statement (WMS) that accompanied the current consultation on the Future Homes and Buildings standards to be delivered by way of changes to Building Regulations (12 December 2023). The WMS states:

*"... the introduction of the 2021 Part L uplift to the Building Regulations set national minimum energy efficiency standards that are higher than those referenced in the 2015 WMS rendering it effectively moot. A further change to energy efficiency building regulations is planned for 2025 meaning that homes built to that standard will be net zero ready and should need no significant work to ensure that they have zero carbon emissions as the grid continues to decarbonise. Compared to varied local standards, these nationally applied standards provide much-needed clarity and consistency for businesses, large and small, to invest and prepare to build net-zero ready homes.*

*The improvement in standards already in force, alongside the ones which are due in 2025, demonstrates the Government's commitment to ensuring new properties have a much lower impact on the environment in the future. In this context, the Government does not expect plan-makers to set local energy efficiency standards that go beyond current or planned buildings regulations. The proliferation of multiple, local standards by local authority area can add further costs to building new homes by adding complexity and undermining economies of scale."*



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

- 4.10 As with Policy CLIM2 above, we are concerned whether at a plan level these requirements are broadly viable and achievable. My client is concerned that this could ultimately adversely impact the deliverability of housing in the District.

**Safeguarding our Natural and Built Environment**

**Policy NBE2: Biodiversity, Geodiversity and Nature Conservation**

- 4.11 While we do not have any specific comments to make in regard to this policy, we note that the biodiversity net gain requirements repeat the content of Policy NBE3 below and therefore question whether this element of the policy is required.

**Policy NBE3: Biodiversity Net Gain**

- 4.12 Our client notes the proposed 10% requirement for biodiversity net gain and have no specific objection to make as this reflects the requirement in the Environment Act. However, given that the Environment Act's statutory requirement for 10% biodiversity net gain is in effect as of February 2024, we query whether this policy is necessary. The National Planning Policy Framework, Dec 2023 (NPPF) is clear in paragraph 16 f) that plans should avoid unnecessary duplication of policies (including policies within the NPPF).
- 4.13 The Site has the potential to meet this requirement as a minimum entirely on site, particularly on the basis of a wider allocation incorporating open space and woodland planting and would not rely on off-site contributions / enhancements. Therefore, the Site offers the potential for significant biodiversity enhancements.

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

- 4.14 Our client notes the requirement that new dwellings will be required to demonstrate that it will meet a water efficiency standard of 95 litres per person per day (lpppd). However, we are concerned that this goes beyond both the mandatory 125 lpppd and optional 110 lpppd requirements set out in existing building regulations. Therefore, this requirement needs to be properly evidenced.
- 4.15 We are concerned with the suggestion of using conditions to restrict occupation of developments prior to the delivery of off-site upgrades for water / wastewater infrastructure. We consider that this could see delays in the delivery of sites. There could be a lack of certainty in the timescales for implementing these upgrades and could lead to situations where multiple sites need to come forward to secure funding for wider upgrades. In addition, the upgrading of water / wastewater infrastructure is often undertaken in 5-year cycles indicating that there could be significant delays to the delivery of housing if this approach is taken forward.
- 4.16 Ultimately, it is not up to developers to provide water / wastewater infrastructure. An infrastructure charge is paid by developers to the relevant providers on a per plot basis, and there is an obligation on the providers to deliver the necessary infrastructure to serve new development in a timely manner. As such, it would be unreasonable to stall development through use of planning conditions as suggested through the draft policy.

- 4.17 We suggest a different approach similar to the Levelling Up and Regeneration Act 2023 statutory duty on water companies to upgrade wastewater treatment works and for LPAs to take account of these future upgrades in their decision-making. This approach, in which decision-makers have regard to planned upgrades, would provide more certainty on the deliverability of sites and avoid unnecessary delays.

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

- 4.18 Our client has no specific comment on this policy other than to highlight that on the basis of a wider allocation incorporating open space and more extensive SuDS, the Site is highly likely able to provide nutrient neutrality on site and is therefore highly deliverable in this respect, particularly when compared to other sites that may be reliant on third party providers to achieve nutrient neutrality.

**Creating Desirable Places**

**Policy DES3 Residential Density and Local Character**

- 4.19 We support that this policy does not set out maximum densities for new development, rather preferring an approach that development proposals should be informed by the surrounding area. However, to be consistent with paragraph 129 of the NPPF, this needs to be balanced with the provision of housing to meet identified needs, and the importance of making efficient use of land, particularly in highly sustainable locations such as the land at Drift Road.

**Delivering Green Connections**

**Policy DGC5: Provision and Enhancement of Open Space, Sport and Recreation**

- 4.20 We note the requirements set out in this policy in regard to the provision of open space on new developments. This policy is supported by Appendix E: Proposed Quantity and Accessibility Standards for Open Space which identifies the proposed open space standards. While we have no specific comments on the level of provision proposed, we have noticed what appears to be a typographical error on the provision for children and young people under the Proposed Quantity Standard column. This states that there should be 0.53 sites per 1000 head of population for provision for children and 0.27 sites per 1000 head of population. We suggest that this should refer to 0.53 ha per 1000 head of population and 0.27 ha per 1000 head of population respectively.

**Homes for All**

**Policy H1: Housing Strategy**

- 4.21 We support the Council's aim to deliver above the Standard Method figure of 2,857 new homes over the plan period requirement and note the aim to allocate for around 3,500 dwellings in the plan. We also acknowledge that paragraph 9.21 of the supporting text seeks for some of this over-supply to address needs in the wider South Hampshire sub-region.
- 4.22 As highlighted in our representations to the Issues and Options consultation, there is a potential shortfall of nearly 13,000 homes within the South Hampshire sub-region. However, whilst 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. The Council should consider how more of this significant shortfall and unmet need in housing supply in the broader sub-region could be addressed in areas such as Clanfield which are well-connected to the South Hampshire sub-region.

- 4.23 In terms of specific neighbouring authorities, Portsmouth City Council's Housing Needs and Housing Targets Update 2021 indicates that the Council will struggle to meet the Standard Method figure due to the availability of land, impacts upon the environment, the capacity of infrastructure and the deliverability of development. While they have not provided a precise figure, Portsmouth City Council are anticipating that their emerging plan will deliver below the Standard Method figure and will seek to address these unmet needs with neighbouring authorities through the Duty to Cooperate. While the Portsmouth's position on housing need will need to be scrutinised, there is the potential for unmet needs to arise from Portsmouth City Council.
- 4.24 In addition, while Havant Borough Council are seeking to deliver against their Standard Method Figure (as per their 2022 Regulation 18 Consultation), the Inspector for the withdrawn Havant Borough Local Plan 2036 highlighted concerns related to the deliverability of several proposed allocations, particularly in Havant Town Centre. There is the opportunity for East Hampshire to accommodate these potential unmet needs in settlements well-located to these Local Authorities, such as Clanfield.
- 4.25 The Council should also consider through the Duty to Cooperate whether the South Downs National Park Authority (SDNPA) is able to accommodate the 114 dpa of housing need identified in the Council's Technical Note and whether these needs could be accommodated in East Hampshire.
- 4.26 The Council advise in paragraph 3.9 that in order to estimate the level of unmet needs arising in the SDNPA the approach is based on the assumption that 100 dpa will be delivered 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 SDNPA part of East Hampshire for the final 12 years of the plan. It cannot be assumed that the 100 dpa will continue given that SDNPA status is a significant constraint on development. Accordingly, the Council should expect unmet needs arising within the SDNPA to be substantially higher than 114 dpa currently assumed.
- 4.27 The Land south of Drift Road, Clanfield falls within the South Hampshire sub-region and near to the SDNP boundary, outside any nationally significant constraints and has good public transport links to Portsmouth. As noted, while the proposed allocation within policy CFD2 is fully supported, as set out the Site provides a significant opportunity to contribute more towards both the market and affordable housing needs of East Hampshire and the unmet needs of neighbouring authorities in South Hampshire and SDNPA.

**Policy H2: Housing mix and type**

- 4.28 We do not have a specific objection to the inclusion of smaller homes on development sites. However, the proposed level of smaller homes should be subject to evidence indicating that, where there is a local need for an alternative housing mix, there should be flexibility in applying the policy.

- 4.29 We welcome the proposed flexibility on applying part M4(2) of the Building Regulations, Category 2: accessible and adaptable dwellings as some developments may have difficulties in delivering this requirement due to site constraints.
- 4.30 We note the requirement for residential developments to demonstrate how they will meet the requirements for an ageing population through the provision of single-storey dwellings. We highlight that there is an opportunity to provide bungalows on the Site as part of a wider allocation. Such properties have less impact on the wider landscape, and the location is well suited to the needs of older people.

### **Policy H3: Affordable Housing**

- 4.31 We do not have a specific comment in relation to the amount of affordable housing that should be required on qualifying residential sites and support the policy's inclusion of a mechanism to review the level of affordable housing provision subject to viability.

## **Site Allocations**

### **CFD2 – Land at Drift Road**

- 4.32 Our client strongly supports the identification of part of the Site for residential development and its allocation for development of 80 homes. It is however considered that this represents a missed opportunity in terms of the additional benefits that could be delivered through a larger scheme by extending the allocation further west.
- 4.33 As set out within previous representations and through this submission, the Site could potentially deliver up to 280 homes along with extensive areas of public open space in excess of policy requirements and a new woodland walk, helping to promote healthy and active lifestyles for new and existing residents. In addition, the allocation of the wider site would allow for a range of further benefits such as additional affordable housing, potential for enhanced biodiversity net gain, increased contributions to local services, and the potential to deliver specific infrastructure (this is considered in more detail below). The wider development of the site would also better facilitate the ability to provide bungalows as part of a more varied housing typology, which Policy H2 indicates there is a clear need for in the District.
- 4.34 As highlighted in Section 3 of this report, additional supporting information on landscape has been prepared which demonstrates how a wider allocation extending further west can be brought forward without a significant adverse impact on the wider landscape, setting of the SDNP or the Gap designation. The submitted Landscape and Visual Appraisal has informed revisions to the Framework Masterplan previously submitted, with the updated version included within Appendix A of these representations.
- 4.35 It is noted that in the Infrastructure Requirements section of the policy, the Council indicate that there is a need for a new GP surgery to replace the existing facility in Clanfield and that it is unlikely the existing surgery could expand on its current site. In acknowledgement of the sustainable location of the Land at Drift Road reference is also made to the potential for the Site to provide land for the development of a new surgery.

- 4.36 In response to this, initial discussions have taken place between our client and the healthcare providers in relation to their requirements and an appropriately sized area of land indicated on the submitted Framework Masterplan for healthcare infrastructure provision. Our client looks forward to discussing this opportunity further with the Council during its preparation of the next stage of the Local Plan.

***Constraints***

- 4.37 The policy comments on a range of constraints and opportunities for development. On landscape matters, we appreciate the landscape sensitivities of the site however, as detailed earlier in these representations (para 3.9 to 3.15), the submitted Landscape and Visual Appraisal, demonstrates how the Site can be sensitively developed. The development would also incorporate the existing PRoW into the green infrastructure network.
- 4.38 In terms of nutrient neutrality, initial calculations have been undertaken which demonstrate that, in respect of a broader allocation, there is the potential to address this constraint on site without the need to rely on third party providers to achieve nutrient neutrality. We will continue to monitor the situation on nutrient neutrality as updates from government are made that should reduce the overall loading that requires to be mitigated.

***Other Infrastructure Requirements***

- 4.39 The policy requirements in relation to Health are addressed above. Regarding the references in the policy that a new road access to Drift Road would require careful consideration, as highlighted earlier in these representations, initial feasibility studies demonstrate that safe access and egress to both the allocated site and wider Site can be achieved.

## 5. Summary

- 5.1 These representations have been prepared by Turley on behalf of our client Bellway Homes Ltd in support of its proposals for development of Land south of Drift Road, Clanfield.
- 5.2 As set out, our client fully supports part of the Site being included as a proposed allocation for residential development. It is however considered that this represents a missed opportunity in terms of the additional benefits that could be delivered through a larger scheme, including:
- Provision of land for a new GP surgery
  - Up to 280 additional homes to contribute towards meeting housing requirements within East Hampshire, and more specifically the identified shortfall in housing need in the South Hampshire sub-region, and to a lesser extent, the SDNPA
  - Additional affordable housing
  - A highly sustainable development with genuine opportunities to encourage walking and cycling to nearby facilities and services, in line with the Council's vision for healthy and active communities
  - The provision of over 6.5ha of public open space to meet a recognised shortfall in the locality, including play space and a woodland walk
  - Potential additional Biodiversity Net Gains above the mandatory 10% on site
  - Achieving nutrient neutrality on-site
  - The provision of bungalows to meet an identified need within East Hampshire
- 5.3 A detailed Landscape and Visual Appraisal has been undertaken which demonstrates that a larger development area than that proposed in the consultation would be suitable for development and that any landscape impacts could be mitigated through a sensitively designed scheme, as illustrated through the submitted Framework Masterplan.
- 5.4 Significantly, there is a realistic opportunity to deliver land for a new GP surgery to assist in addressing the existing capacity issues with the current facility, which my client is aware is a significant issue for existing residents. This would provide a significant benefit to the existing community as well as catering for new residents.
- 5.5 We trust that the information provided within these representations will be fully considered by the Council in preparing the next stage of the Local Plan.

# Appendix 1: Framework Masterplan

## **Appendix 2: Landscape and Visual Appraisal**



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- Site Boundary
- Residential Development
- Residential/Health Including potential land for a GP Surgery
- Key/Landmark Buildings
- Area of reduced height buildings along highest part of site as per LVIA advice
- Green Infrastructure including Public Open Space
- Retained Agricultural Land
- Proposed Tree Copses
- Retained Trees and Hedges
- Proposed Sustainable Drainage Features
- Proposed Equipped Play Area (LEAP)
- Retained Public Right of Way
- Potential Walking Loop
- 1 Proposed Primary Access
- 2 Pedestrian /Cycle Access and Potential Secondary / Emergency Access

CLIENT: \_\_\_\_\_  
**Bellway Homes**

PROJECT: \_\_\_\_\_  
**Land South of Drift Road**

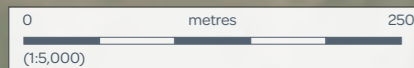
DRAWING: \_\_\_\_\_  
**Framework Masterplan**

PROJECT NUMBER: \_\_\_\_\_  
**BELS3017**

DRAWING NUMBER: **3101** CHECKED BY: \_\_\_\_\_ CD

REVISION: **A** STATUS: **Submission**

DATE: **February 2024** SCALE: **1:5,000 @ A3**



# Landscape and Visual Appraisal

Land at Drift Road, Clanfield, East Hants, PO80JJ

On behalf of Bellway Homes Limited (Wessex)

Date: 20/02/2024 | Pegasus Ref: P21-2468

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## Document Management.

Version	Date	Author	Checked/ Approved by:	Reason for revision
V2 Final	20/02/2024	CR	CR/AC	Client and team comments



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## Appendices contents.

Appendix 1 – Site Location Plan

Appendix 2 – Environmental Designations Plan

Appendix 3 – Context Viewpoints

Appendix 4 – Framework Masterplan (Project number/drawing number: BELS3017/3201)



# 1. Introduction

- 1.1. This Landscape and Visual Appraisal (LVA) has been prepared on behalf of Bellway Homes Ltd (Wessex) to consider the land at Drift Road, Clanfield, East Hants, PO8 OJJ ('the site') as illustrated on the Site Location Plan (Appendix 1). This appraisal is intended to support the promotion of the site for residential development through the Local Plan, and consider the implications this may have on the settlement gap and the setting of the South Downs National Park.
- 1.2. This appraisal should be read in conjunction with the following appendices:
  - Appendix 1 – Site Location Plan
  - Appendix 2 – Environmental Designations Plan
  - Appendix 3 – Site Context Photographs 1 – 6
  - Appendix 4 – Framework Masterplan (Job reference/drawing reference: BELS3017/3101)
- 1.3. The site visit was undertaken on 8<sup>th</sup> December 2023 to consider the potential landscape and visual effects arising from residential development within the site in line with the parameters defined and illustrated on the Framework Masterplan (Appendix 4) and to advise on a suitable landscape mitigation strategy to provide the best prospects of securing planning consent.
- 1.4. It is acknowledged that as part of the Draft Local Plan 2021–2040 (Regulation 18), part of the site is identified as a proposed allocation site for 80 units as 'CFD2 – Land at Drift Road' and 'LAA Reference HD-010'.

# 2. Development Context

- 2.1. The site covers approximately 24.2 hectares (59.8 acres) of gently sloping arable farmland to the southwest of Clanfield between Drift Road to the north, Godwin Crescent to the east, White Dirt Lane and Glamorgan Road to the south. The separate village and linear settlement pattern of Catherington is located along Downhouse Road to the west of the site (Appendix 1, Site Location Plan).
- 2.2. The site is currently undeveloped and comprises a single, large-scale arable field adjacent to the settlement edge of Clanfield, gently rising from approximately 90m above Ordnance Datum (AOD) along White Dirt Lane to the east to a broad ridgeline forming a 'saddle' to the west at approximately 115m AOD. This landform then slopes down to approximately 93m AOD along the Downhouse Road within Catherington village to the west which also forms the boundary to the National Park. The broad ridgeline or saddle acts to physically and visually separate the villages of Clanfield and Catherington. The landform to the east of the saddle slopes inwardly towards the Clanfield urban edge providing a strong physical and visual linkage to the settlement to the east, as opposed to Catherington which is located on the opposite side of the ridgeline. A further two smaller-scale arable fields are located between the western boundary of the site and the residential properties along Downhouse Road. The southern boundary is defined by overhead pylons and transmission lines which form an existing visual detractor in the context of the site and the locality. A single Public Right of



Way (PRoW) footpath (no. 49) extends between Drift Road and White Dirt Lane and diagonally crosses the eastern extent of the site.

- 2.3. The wider settlement of Clanfield is located directly adjacent to the northern, eastern and part of the western boundary of the site, along Drift Road to the north and along White Dirt Lane / Southdown Road to the east of the site.
- 2.4. As noted above the topography of the site is between 90–115m AOD, to the east of the site beyond White Dirt Lane/Southdown Road, the land which is draped with residential development rises gradually, reaching approximately 115m AOD at the point where Drift Road meets London Road, adjacent to the A3(M) dual carriageway.
- 2.5. Beyond the A3(M) dual carriageway, the land continues to rise up to Horndean Down, reaching a local high point at Windmill Hill of 193m AOD within the National Park. The boundary of the National Park runs along the western edge of the A3(M), along Charlton Lane at the northern extent of Clanfield, running along the existing eastern settlement edge of Clanfield and along Downhouse Road and a section of Catherington Lane. When it nears the settlement of Catherington it follows field boundaries, as illustrated on the Environmental Designations Plan at Appendix 2.
- 2.6. The existing residential development located near the junction of Drift Road and Sunderton Lane is located at approximately 110m AOD, just to the north of the site's northern boundary. Beyond the site to the west the land slopes gradually to approximately 90m AOD along Downhouse Lane, before rising to 150m AOD along Hinton Manor Lane, reaching a high point of 156m AOD at the Reservoirs Observatory, within the South Downs National Park.

### 3. Environmental Designations

- 3.1. There are a number of environmental and relevant Draft Local Plan designations within the surroundings of the site as shown on Appendix 2 including:
  - Local gap designation, Horndean / Catherington / Clanfield (Policy NEB11, Draft Local Plan 2021–2040) covering the site and the fields to the south of White Dirt Lane between the settlements of Horndean, Catherington and Clanfield;
  - The South Downs National Park (SDNP) is located beyond the A3(M) dual carriageway approximately 470m to the east and beyond Downhouse Road, Catherington approximately 280m to the west of the site;
  - PRoW footpath (no. 49) extending across the site between Drift Road and White Dirt Lane; and
  - Catherington Conservation Area is located approximately 760m to the southwest of the site.

### 4. Landscape Character

- 4.1. The site is located within the following published Landscape Character Assessments:
  - National Character Area: 125 South Downs;



- Hampshire Integrated Character Assessment: LCA 7h – South East Hampshire Downs; and
- East Hampshire District Landscape Character Assessment: LCA 3f – Horndean – Clanfield Edge.

### East Hampshire District Landscape Character Assessment

4.2. At the District level and finest level of all three studies, the key characteristics of the East Hants, Horndean – Clanfield Edge (LCA 3f) are:

- *“Located on the lowest elevations of the south facing chalk dipslope. A gently sloping landform with some undulations in the chalk created by dry valleys;*
- *Chalk bedrock geology overlain with clay with flints at higher elevations and Head deposits along the dry valleys. A greater depth of clay has also accumulated on the lower dip slope resulting in a subtle transition to the Wooded Claylands to the south – this area was formerly part of the Forest of Bere;*
- *Some fields in arable cultivation remain around the built edge of Horndean and Clanfield. Much of the land is now used as paddocks for horse/pony grazing, particularly the smaller fields in the southern part of the area;*
- *Relatively little woodland, but that which remains for example Yoells Copse is an important local feature;*
- *Views are typically to blocks of residential development superimposed on the chalk landform;*
- *Extensive area of medieval assarted fields west of Horndean typified by small to medium irregular enclosures, with a smaller area of recent enclosures to the north;*
- *Settlement has developed in a linear form along the A3 linking Horndean and Clanfield. These settlements have subsequently expanded to form larger blocks of built development;*
- *Electricity pylons cut across the landscape north of Horndean and are a highly visible and prominent feature;*
- *The A3 effectively severs the area from the downs to the east. Smaller rural roads link development. There are a number of ancient lanes through the area such as Coldhill, Ham, Crouch and Tagdell Lanes, and*
- *The extent of development and roads fragments the landscape into a series of smaller blocks. There is a good rights of way network extending from the urban edge, for example linking to Catherington Down SSSI.” (Underlining, authors emphasis)*

4.3. Under the heading of ‘Location and Boundaries’ the LCA is described as being “*characterised by urban fringe land uses and views to the development edge.*” The text goes on to note that the character is defined as ‘*enclosed*’ subtype, and that this relates to, “*...the lower dipslope, and the built form which contributes to an enclosed character.*”



- 4.4. Under the heading of 'Physical Landscape,' the assessment states that, *"The character area lies on the lowest elevations of the south facing chalk dip slope. The chalk bedrock geology informs the landform which slopes gently in a southerly direction. Dry valleys have been cut into the chalk creating an undulating character in places..."*
- 4.5. The text goes on to note that, *"The land use is predominantly housing and infrastructure, although arable fields remain on the edges of the built development, with pasture (paddocks) also common. The fields are medium/large in size and are separated by thin/gappy hedgerows."*
- 4.6. Under the heading 'Perceptual/Experiential Landscape' the assessment states that, *"Although built form only accounts for just over half of the land use, the visual influence of the built edge impacts upon the character of the area more widely. Views of the movement and activity of the urban areas are visible from rural roads which cut through the surrounding arable fields and form a marked contrast with the quieter, more tranquil landscape of the adjacent Clanfield Downland Mosaic."*

*This is a highly varied landscape. This contrast between built development and arable land creates a landscape which is lacking in unity, a feature which is accentuated by the electricity pylons and roads which transect the landscape.*

*Within the urban areas, the sense of tranquillity is diminished by a high level of movement and noise associated by vehicles and other forms of human activity. Traffic on the A3 is a significant audible influence. From the surrounding arable fields views are frequently to a stark built edge. An exception is the elevated scarp at Catherington Down, which provides expansive and panoramic views across to the coast, the Solent and the Isles of Wight. There is very little woodland cover to provide screening or integration of built development, although that which remains such as at Yoells Copse is an important local feature..." (Underlining, authors emphasis)*

- 4.7. With regard to biodiversity, the assessment notes that whilst the main areas of ecological interest are small scattered woodlands, elsewhere, the area is characterised by arable fields and horse paddocks, bound by a thin, gappy hedgerow network.
- 4.8. The landscape and visual sensitivities listed for the landscape area of relevant to the development proposals include:
- *"Hedgerow field boundaries and remnant areas of woodland such as at Yoells Copse.*
  - *Arable fields and chalkland landform surrounding the built edge.*
  - *The local rights of way network linking the urban area to the downland landscape.*
  - *Remaining elements of tranquillity and dark night skies which are affected by development both within and beyond the character area on the south coast plain.*
  - *The absence of woodland and the relatively open views accentuates the visual sensitivity of the landscape." (Underlining, authors emphasis)*
- 4.9. The overall management strategy for the Horndean – Clanfield Downland Mosaic is to *"conserve remaining elements of the chalk downland landscape and enhance the setting of built development."*



4.10. Landscape Management Considerations of relevance to the development proposals include to:

- *“Maintain the rights of way network, particularly the good links with Catherington Downs. Seek to limit damage to footpaths by horses.*
- *Conserve the integrity of the strong rolling chalk landform around Clanfield.*
- *Restore hedgerow boundaries to provide visual unity and intactness and increase biodiversity and link to areas of woodland. Promote growth of hedgerow trees.*
- *Consider opportunities for further tree and woodland planting to contain and reduce the visual impact of the built edge.*
- *Conserve the pattern of small assarted fields and seek to conserve/reinstate hedgerow boundaries...” (Underlining, authors emphasis).*

4.11. Development Considerations for the character area, are listed as:

- *“Monitor the expansion of the urban edge of Horndean and Clanfield to ensure that it does not expand further onto areas of open rolling chalk downland.*
- *Seek opportunities for further woodland planting to soften, screen and contain built development.*
- *Maintain links and connections (rights of way) between the urban area and the wider downland landscapes.”*

4.12. With regards to accommodating residential development within the site, as previously noted, the site is undeveloped, gently sloping, and located directly adjacent to the settlement of Clanfield. As established during the site visit, the landscape within which the site is located is more enclosed than other areas in the locality owing primarily to interactions between the topography and existing built form.

4.13. Under key characteristics, typical views are noted as being to blocks of residential development. The electricity pylons which cross the site are also noted as being a highly prominent feature within the character area, and the extent of development and roads are noted as fragmenting the landscape into a series of smaller blocks. The boundaries to the character area do not stop at the settlement edges of Clanfield and Horndean, and as such, residential development is considered to be a key characteristic of the character area, acknowledging that the area also contains areas of undeveloped land on the periphery of these settlements. The assessment acknowledges that this is an LCA which is *“characterised by urban fringe land uses and views to the development edge”*,

4.14. The site is not located within a statutory or non-statutory landscape designation such as a National Park, National Landscape (formerly known as an Area of Outstanding Natural Beauty) or local plan Special Landscape Area (SLA). The site is located within a local gap (Policy NEB11 within the Draft Local Plan 2021–2040) and is likely to be considered to be within the setting of the National Park given the intervisibility from the higher ground at Horndean Down and Windmill Hill to the east (Viewpoint 4) and from Hinton Manor Lane (Viewpoint 6) to the west of the site. Although the site is not considered to be a landscape of high value, this is in



accordance with the East Hampshire Landscape Capacity Study (2018), which assesses the site as medium value.

- 4.15. The development proposals for the site bring forward the opportunity for a comprehensive and robust landscape strategy in accordance with the landscape management considerations, and with regard to the landscape and visual sensitivities for the character area.
- 4.16. Maintain the rights of way network As illustrated by the Framework Masterplan the proposals will maintain the PRow within the site, on its original alignment within a green infrastructure corridor, with the opportunity for PRow users to utilise other areas of public open space within the proposals which are currently private land.
- 4.17. Conserve the integrity of the strong rolling chalk landform The layout of the proposals illustrated on the Framework Masterplan (at Appendix 4), the perception of the sloping landform, which forms part of the wider rolling topography would still be appreciated with the proposals in situ.
- 4.18. Restore hedgerow boundaries to provide visual unity and intactness and increase biodiversity and link to areas of woodland. Promote growth of hedgerow trees. and Consider opportunities for further tree and woodland planting to contain and reduce the visual impact of the built edge. As part of the proposals, there is the opportunity to provide a robust woodland buffer edge to the proposals, as illustrated in the Framework Masterplan. The woodland buffer, would not only create a defensible edge to the proposed built form, but also aid in softening and over time preventing views of the built form. There is also the opportunity for tree planting to take place throughout the site, so in views from the east within the residential area, the proposed built form would be broken up by vegetation, and similar in appearance to the existing residential areas within Clanfield, which are laid out across the rolling landform.
- 4.19. conserve/reinstate hedgerow boundaries With the exception of short lengths of vegetation which will need to be removed to accommodate the access and associated visibility splays, the proposals present the opportunity to enhance and strengthen the existing boundary hedgerows, as well as include additional shrub planting across the site.
- 4.20. The Terra Firma consultancy has undertaken a landscape capacity study (Sept 2018) as part of the evidence base for the East Hants Local Plan to consider the capacity of various land parcels across the District to accommodate development. The site and wider context is located within the Local Area 3F.1 Clanfield land parcel which was considered to exhibit a 'medium/low' capacity to accommodate development in overall terms.
- 4.21. In the summary, the landscape capacity study stated with regards to the site:
- "Local Area 3f.1 has a medium/low capacity, whereby some small areas could accommodate new development. The local area is constrained by its contribution it provides to the rural setting of the adjacent SDNP and the amenity value it provides to residents of the adjacent urban area. The area has had a history of ongoing infill development since the 1930's slowly filling any undeveloped land with housing. The two remaining areas, starting with the northern section contains two well-used recreation fields, which both have views out to the SDNP and are well used. However, the northern section is characterised by a number of small fields with robust hedgerows, which could accommodate development. The southern section is far more open and visible from the*



*surrounding urban area, however towards the west the local area is more enclosed with robust hedgerows and again could accommodate small areas of development while maintaining gaps to the west and an open physical link to the SDNP.”*

- 4.22. The ‘medium/low capacity’ judgment applies to the wider 3F.1 Clanfield land parcel, however, the study also acknowledges that small areas could accommodate development. The LCA particularly notes that the character area “*comprises a small area of downland to the west of Horndean and south of Clanfield...[and]...is characterised by urban fringe land uses and views to the development edge.*” Whilst development within the site would be classified as infill development in this context it does, by virtue, ensure that more sensitive locations across the District would remain unaffected.
- 4.23. The site is considered to be partially open in character albeit noting that its easterly facing slope and visual links to the existing settlement give it a greater affiliation to Clanfield and more enclosed character than other areas of undeveloped land with the wider area, so it does, in part, contribute to the spatial separation and local gap between Clanfield and the linear settlement pattern of Catherington to the west. The site is partially influenced by an existing visual detractor with the pylons and transmission lines located to the south of the site. The site benefits from sloping ‘inwardly’ towards Clanfield village centre providing a strong physical and visual linkage to the settlement..

## 5. Visual Amenity

- 5.1. Development within the site would be visible within:
- Close proximity views from PRow footpath (no. 49) within the site (Viewpoints 1 and 2), Drift Road to the north (Viewpoint 5), White Dirt Lane and Southdown Lane to the east;
  - Medium proximity views from residential areas between White Dirt Lane and the A3(M) to the east including Draycote Road, Viking Way and Wessex Road on the rising hillside and residential streets within Clanfield to the east (Viewpoint 3); and
  - Distant views from the PRow footpath from Horndean Down and Windmill Hill rising up to 193m AOD to the northeast (Viewpoint 4) and from Hinton Manor Lane to the west within the National Park (Viewpoint 6).
- 5.2. The character and appearance of the site would inevitably change from open arable farmland to a residential development and public open space. Development within the site would continue the settlement pattern within the Clanfield to the north and east. However, the Framework Masterplan demonstrates how the perceived gap and visual separation between Clanfield and Catherington can be maintained whilst also considering the setting of the National Park as visible from Horndean Down / Windmill Hill to the east (Viewpoint 4) and Hinton Manor Lane to the west of the site (Viewpoint 6).
- 5.3. From locations within the site (Viewpoints 1 and 2) whilst PRow users currently experience views across the lower sections of the site, longer-ranging views westward are contained by the rising landform within the site, demonstrating long-ranging views and intervisibility with the National Park is prevented from these locations.



- 5.4. It is important to note that in each location where views of the site and any associated proposal could be visible, that it would never be seen in isolation, and always seen in the context of the existing residential development.

## 6. Local Gap

- 6.1. As part of the Draft Local Plan 2021-2040 (Regulation 18), a Gaps between Settlements Background Paper (January 2024) has been prepared for Policy NBE11. The introduction of the document set out that, *"Gaps between settlements are a planning tool to prevent coalescence of settlements and maintain their separate identity. However, designation of a gap does not refer to landscape quality or character, or protection of the countryside."*
- 6.2. The background paper sets out nine criteria (a-i) within the methodology that were used when defining the extent of the gaps. Gap criteria a, open and undeveloped notes that whilst gaps should generally be open and have an undeveloped nature, and that, *"Ideally there should be an absence of existing urban activity but this will not realistically be achievable."* As acknowledged earlier in this appraisal due to the proximity of the site to the settlement edge, and the orientation of the landform within the site, that particularly the eastern part of the site has a greater affiliation with the existing residential edge and its associated urbanising sights and sounds, than the undeveloped countryside to the west and south. Furthermore, the site is crossed by pylons and transmission lines.
- 6.3. Criteria b, sufficient separation between settlements, states that *"A gap should provide a sense of arriving/leaving a place, a feeling of separation, the identity of which would be lost by coalescence."* As set out above the site is located in the Draft gap policy named 'Horndean / Catherington / Clanfield', which covers the site and the fields to the south of White Dirt Lane between the settlements of Horndean, Catherington and Clanfield. The criteria wording *"a sense of arriving/leaving a place..."* is concerned with members of the public, and how they move throughout the landscape, either via the local roads or PRoW. As noted earlier, due to the topography of the site users on the on-site PRoW have no visibility or appreciation of the wider settlements of Horndean and Catherington (Viewpoints 1 and 2), the development of the site would not change the scenario at this location. There is no other PRoW in the locality, to the north of White Dirt Lane from where PRoW users are able to get a sense of leaving one settlement, walking through an undeveloped area, and entering another settlement. From any PRoW to the south of White Dirt Lane where users are leaving the settlements of Catherington or Horndean, development on the site in line with the Framework Masterplan would be barely perceptible.
- 6.4. For road users travelling along Drift Road, the settlement boundary of Clanfield runs alongside the northern edge of Drift Road, adjacent to the site's northern boundary, and also encompasses the dwellings on the southern side of the road, near the junction with Downhouse Road. The dwellings and other built within the settlement boundary of Catherington and Horndean are not visible from this location – the farm building visible on the far right side of Viewpoint 5 is within the Local Gap, not within a settlement boundary. Road users on Drift Road along the northern boundary of the site would have a sense they are in Clanfield, as they continue their journey along Drift Road, turning down Downhouse Lane, prior to the recent development at Collins Road which infilled into the Local Gap, there was a break in the built form located within Clanfield and Catherington. Today no such gap exists.



- 6.5. As illustrated on the Environmental Designations Plan (at Appendix 2) road users travelling along White Dirt Lane once they leave the settlement of Catherington and travel north, have the opportunity to travel through the Local Gap before entering the settlement of Clanfield. Due to intervening landform and roadside vegetation road users would not be able to gain views of the proposals, and therefore there would not be any actual or perceived coalescence.
- 6.6. Criteria c, aligning to a recognised feature, states that *“The boundary of a gap should consider the existing vegetation and land uses (gardens, footpaths, hedgerows, streams, field boundaries, woodlands and backs of houses). These act as a robust edge to a gap (act as visual screen to housing) ...”* It is noted that the proposed boundary for the allocation within the site (CFD2 / HD-010) has been used to define the new extent of the Local Gap (see Appendix 2) rather than an existing topographical feature such as a ridge, or indeed a proposed hedgerow or woodland belt, informed by a proposed masterplan for the site which would provide a new robust boundary. The current line which defines the western boundary of the allocation is arbitrary, does not follow an existing boundary and vaguely follows the site contours, although it is unclear as to what analysis is behind drawing the line along a certain contour.
- 6.7. The Draft Local Plan advises with regards to the strategic gaps within Policy NBE11: Gaps Between Settlements covering the site that *“Development proposals will be weighed against the risk of coalescence. Consideration will include: Whether the proposed application would compromise the existing openness and undeveloped nature between settlements; either individually or cumulatively with other development; Whether there is sufficient separation between settlements (a sense of arriving/ leaving a place); and The visual perception of the application from the adjacent developed areas and from highways and public rights of way”* The Local Plan gap designation therefore does not strictly preclude development provided these policy criteria are met. Development within the site could be designed to maintain the perceived gap and visual separation between Clanfield and Catherington as shown on the Concept Masterplan and Landscape Mitigation Plan (Appendix 4).

## 7. South Downs National Park

- 7.1. The NPPF paragraph 182 advises that *“...development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.”* The site is not located within the National Park, separated by a buffer of residential development along Downhouse Road and the wider settlement of Clanfield, although it is partially visible from Horndean Down / Windmill Hill to the east (Viewpoint 4) and from Hinton Manor Lane to the west of the site (Viewpoint 6). As such, the site would be considered to be within the setting of the National Park. Development within the site could be designed to avoid any visual effects from Hinton Manor Lane to the west by ensuring the heights of residential properties do not breach the broad ridgeline or saddle landform crossing the site to the west. The views from Horndean Down / Windmill Hill to the east could be mitigated by containing development on the lower slopes to appear continuous with the character of existing residential areas within Clanfield and Horndean in the lower valley.

## 8. Framework Masterplan

- 8.1. The Framework Masterplan is illustrated on Appendix 4. To demonstrate how development could be accommodated on the site set within a robust and well considered landscape



framework, the following design parameters and landscape mitigation measures have been incorporated into the proposals:

- Containing development to the eastern slopes of the site to appear continuous with the urban edge and settlement pattern of Clanfield;
- Retaining the broad ridgeline or saddle of higher ground to the west as arable farmland or public open space to maintain the local gap between Clanfield and Catherington;
- Extending the residential parcels around the 105 metre AOD contour approximately at No. 73a Drift Road – this would ensure that single storey property would not be visible above the ridgeline to the west to visually maintain the local gap;
- Enclosing the residential parcels on the lower slopes and urban edge with a woodland buffer to maintain a physical and visual gap between Clanfield and Catherington villages, provide a robust and defensible edge, and to mitigate the visual effects from Horndean Down / Windmill Hill within the National Park in line with the landscape management considerations for the host landscape area;
- Provision of SuDS attenuation basins on the lower ground to create a village pond and attractive settlement gateway leading into the development;
- Enhancements to green infrastructure including the creation an informal public open space, country park and play area on the higher ridgeline to provide views towards Windmill Hill to the east of the site; and
- Provision of informal footpaths and green links through development between the hilltop parkland and the local centre to improve accessibility across the site which is currently private land.

## 9. Summary

- 9.1. The site is partially allocated for 80 units as 'CFD2 – Land at Drift Road' and 'LAA Reference HD-010', which falls within the draft Gaps Between Settlements designation (Policy NBE11) and the setting of the South Downs National Park. The site has been identified as exhibiting a 'medium/low' capacity for development within the East Hants Landscape Capacity Study (Sept 2018).
- 9.2. With regards to accommodating residential development within the site, as previously noted, the site is undeveloped, gently sloping, and located directly adjacent to the settlement of Clanfield. As established during the site visit, the landscape within which the site is located is more enclosed than other areas in the locality owing primarily to interactions between the topography and existing built form.
- 9.3. As demonstrated by the accompanying Framework Masterplan a robust design strategy can be presented to safeguard the local gap between the Clanfield and Catherington. Similarly, these design parameters would mitigate the effects on the setting of the National Park as the development would not be visible from Hinton Manor Lane to the west and would appear continuous with the settlement pattern of Clanfield and Horndean within the lower valley to the east.



- 9.4. Under key characteristics of the East Hants, Horndean – Clanfield Edge (LCA 3f) within which the site is located, typical views are noted as being to blocks of residential development. The electricity pylons which cross the site are also noted as being a highly prominent feature within the character area, and the extent of development and roads are noted as fragmenting the landscape into a series of smaller blocks. The boundaries to the character area do not stop at the settlement edges of Clanfield and Horndean, and as such, residential development is considered to be a key characteristic of the character area, acknowledging that the area also contains areas of undeveloped land on the periphery of these settlements. The assessment acknowledges that this is an LCA which is *“characterised by urban fringe land uses and views to the development edge”*.
- 9.5. The development proposals for the site bring forward the opportunity for a comprehensive and robust landscape strategy in accordance with the landscape management considerations, and with regard to the landscape and visual sensitivities for the character area and Gaps Between Settlements designation.
- 9.6. The character and appearance of the site would inevitably change from open arable farmland to a residential development and public open space. Development within the site would continue the settlement pattern within the Clanfield to the north and east. However, the Framework Masterplan demonstrates how the perceived gap and visual separation between Clanfield and Catherington can be maintained whilst also considering the setting of the National Park. It is also important to note that in each location where views of the site and any associated proposal could be visible, they would never be seen in isolation, and always seen in the context of the existing residential development.





## Appendix 1 – Site Location Plan



- KEY**
- Site Boundary
  - Viewpoint Locations

NOTES:  
REVISIONS:

**SITE LOCATION PLAN**

DRIFT ROAD, CLANFIELD

BELLWAY HOMES



DATE	SCALE	TEAM	APPROVED
26/01/2024	1:10,000@A3	MW	CR

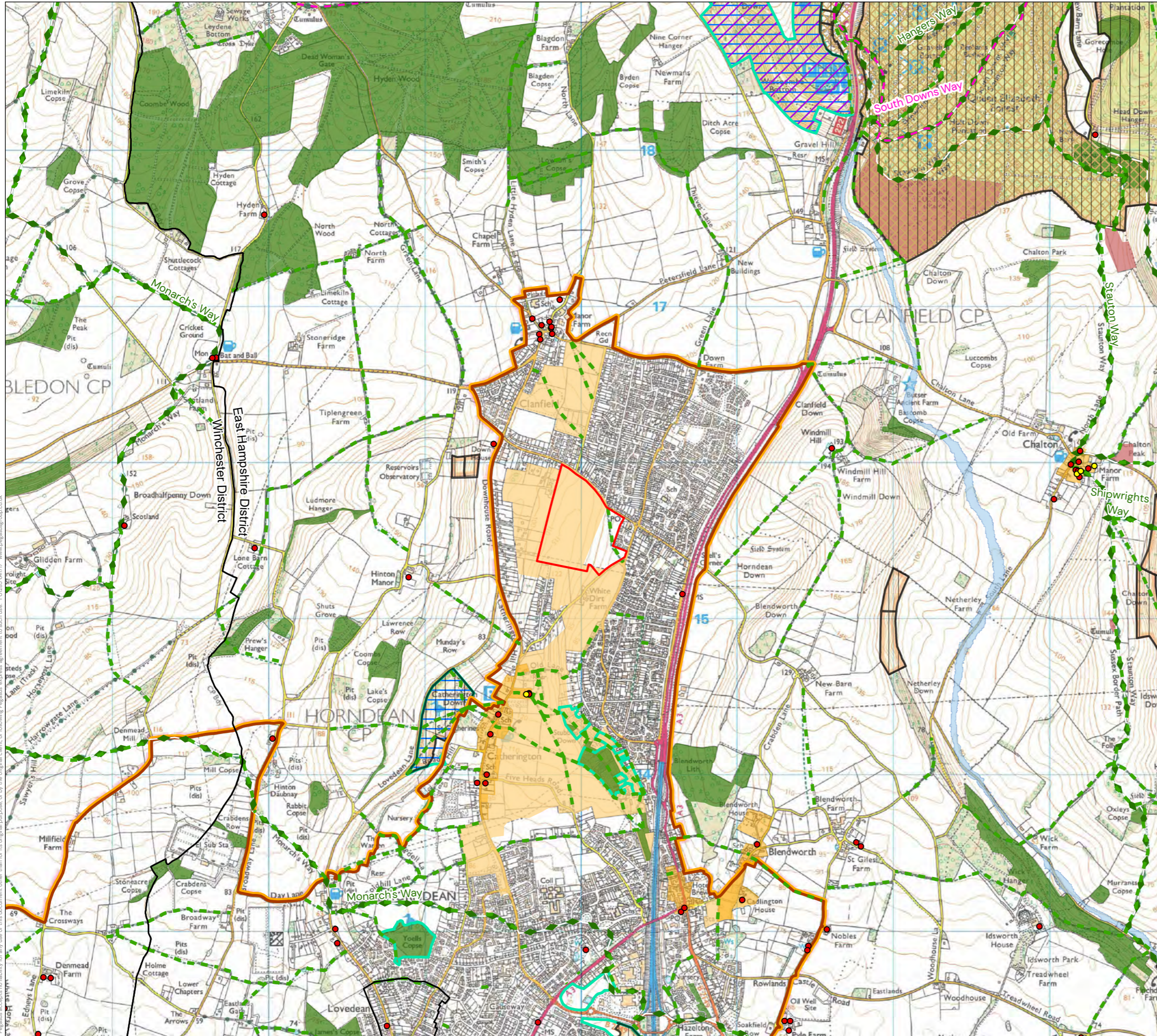
SHEET	REVISION
-	A

DRAWING NUMBER  
P21-2468\_01

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## Appendix 2 – Environmental Designations Plan



- KEY**
- Site Boundary
  - District Boundary
  - Grade II\* Listed Building
  - Grade II Listed Building
  - Public Rights of Way
  - National Trails
  - Long Distance Routes
  - National Parks
  - CRoW Access Land
  - Country Parks
  - Scheduled Monuments
  - Conservation Area
  - Local Nature Reserves
  - Special Areas of Conservation
  - Sites of Special Scientific Interest
  - National Nature Reserves
  - Ancient Woodland
  - EA Flood Zone 3
  - EA Flood Zone 2
  - Local Gaps (Draft Policy NEB1)

NOTES:  
REVISIONS:

**ENVIRONMENTAL DESIGNATIONS PLAN**

DRIFT ROAD, CLANFIELD

BELLWAY HOMES



DATE	SCALE	TEAM	APPROVED
26/01/2024	1:25,000@A3	MW	CR

SHEET	REVISION
-	A

DRAWING NUMBER  
P21-2468\_EN\_02



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## Appendix 3 – Context Viewpoints



Approximate horizontal extent of site





Approximate horizontal extent of site





Approximate horizontal extent of site





Approximate horizontal extent of site



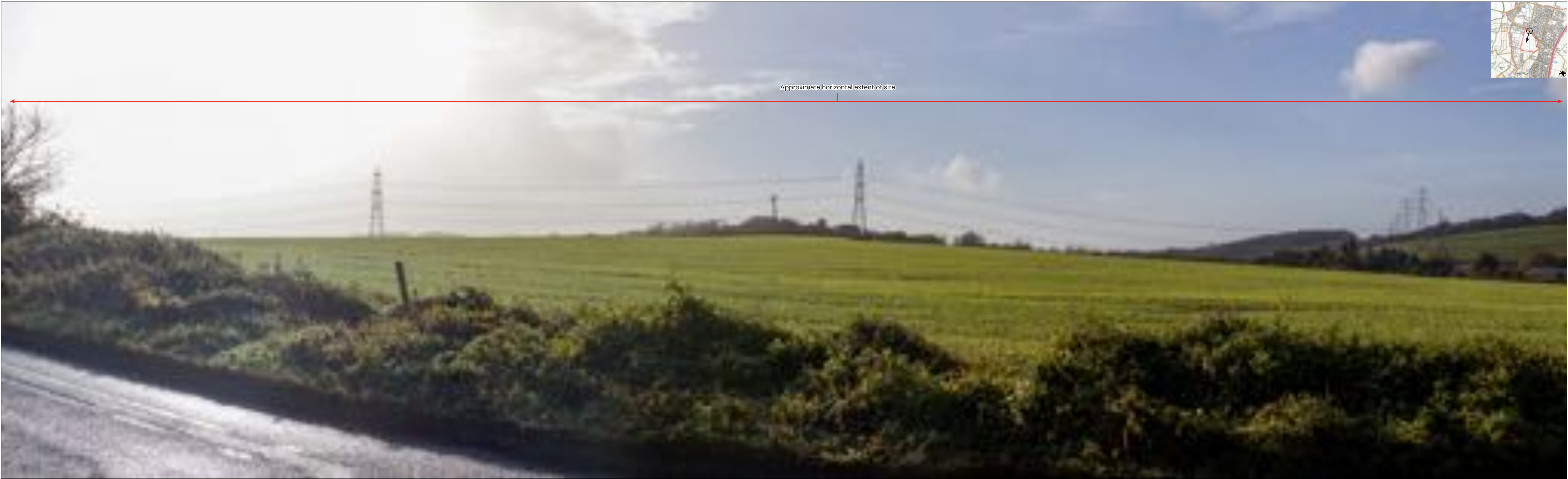


Approximate horizontal extent of site





Approximate horizontal extent of site



Approximate horizontal extent of site



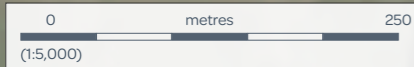


Approximate horizontal extent of site





## **Appendix 4 – Framework Masterplan (Project number/drawing number: BELS3017/3201)**



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-  Site Boundary
-  Draft Allocation Boundary
-  Residential Development
-  Residential/Health Including potential land for a GP Surgery
-  Key/Landmark Buildings
-  Area of reduced height buildings along highest part of site as per LVIA advice
-  Green Infrastructure including Public Open Space
-  Retained Agricultural Land
-  Proposed Tree Copses
-  Retained Trees and Hedges
-  Proposed Sustainable Drainage Features
-  Proposed Equipped Play Area (LEAP)
-  Retained Public Right of Way
-  Potential Walking Loop
-  Proposed Primary Access
-  Pedestrian /Cycle Access and Potential Secondary / Emergency Access

CLIENT: \_\_\_\_\_

**Bellway Homes**

PROJECT: \_\_\_\_\_

**Land South of Drift Road**

DRAWING: \_\_\_\_\_

**Framework Masterplan  
with draft allocation boundary**

PROJECT NUMBER: \_\_\_\_\_

**BELS3017**

DRAWING NUMBER: \_\_\_\_\_ CHECKED BY: \_\_\_\_\_

**3201** **CD**

REVISION: \_\_\_\_\_ STATUS: \_\_\_\_\_

**A** **Submission**

DATE: \_\_\_\_\_ SCALE: \_\_\_\_\_

**February 2024** **1:5,000 @ A3**

Town & Country Planning Act 1990 (as amended)  
Planning and Compulsory Purchase Act 2004

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GU31 4EX

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

**Date:** 26 February 2024

**Our ref:** 66132/01/SSL/IB/29895197v2

Dear Sir/Madam

## **Representations to the East Hampshire Draft Local Plan Regulation 18 (Part 2) public consultation – Berkeley Homes**

This letter has been prepared by Lichfields and is submitted on behalf of our client, Berkeley Homes Southern Ltd ('Berkeley Homes'), in relation to land to the southeast of 41-43a Blackberry Lane, Four Marks ('The Site'). It comprises a formal response to the current East Hampshire Draft Local Plan – Regulation 18 (Part 2) public consultation ('the draft plan'). These representations build upon those provided by Lichfields to the previous Regulation 18 (Part 1) consultation on the draft plan, submitted in January 2023.

### **Overview**

The Site comprises 0.74 hectares of part-brownfield land and lies to the southeastern side of Blackberry Lane, close to Four Marks' village centre. It sits directly behind 41 to 43A with an existing access located between the properties, and currently contains some dilapidated buildings (see Site Location Plan appended to this letter).

Supporting the delivery of much needed new homes in a sustainable way is a top priority for the draft Plan, and Berkeley Homes support the Council's positive approach to meeting future housing needs by identifying proposed site allocations for housing development. To this end, while the draft Plan does not presently identify The Site as one such allocation, there are a number of other proposed allocations at the settlement demonstrating that it is a sustainable location for new development. Berkeley Homes own The Site, and it should therefore be considered as being deliverable for small-scale housing in the short term.

The Site represents a strong opportunity for residential development with minimal impact in a highly accessible location that would support the role, setting, form and character of Four Marks as a sustainable settlement.

As requested by the consultation, we set out below our specific comments on the draft plan with reference to the relevant section, policy, or site.

### **Policy S1 Spatial Strategy (Page 38)**

Berkeley Homes would agree that, as set out in the Testing the Standard Method Housing Need for East Hampshire Update: Technical Note (September 2023) informing the preparation of the draft plan, there are no exceptional circumstances to justify an alternative approach to determining a lower housing need figure than that identified using the standard method. As such, it is important that the draft plan identifies sufficient sites to meet the assessed housing need of 578 dwellings per annum ('dpa').

Notwithstanding, it is recognised that the Local Plan area for East Hampshire is defined by those areas in the District that are not covered by the South Downs National Park ('SDNP') Local Plan (2019), and that as a result, a proportion of the standard method figure will be delivered in the SDNP area. The Technical Note concludes that, based on analysis of household growth and affordability, an appropriate split is for a need of around 114 dpa in the SDNP area (where this is within East Hampshire), resulting in a remaining need of around 464 dpa in the Local Plan area. Chapter 3 of the draft Plan goes on to confirm that when assumptions are made for potential unmet need in the SDNP area (i.e. considering the landscape sensitivity and policy constraints associated with the National Park, there is potential for some unmet housing needs) based on past delivery of c.100 dpa and historic agreements with the SDNP area, there would be a residual requirement of 14 dpa – resulting in a total minimum number of homes required in the Local Plan area of 478 dpa (or 9,082 over the 19-year plan period from 2021 to 2040). This is reflected by the housing requirement set by draft Policy S1.

Berkeley Homes do not dispute this updated analysis and support the overall approach to meeting its assessed housing need in full, as well as making provision for an identified shortfall in the SDNP area. However, it is noted that these unmet needs are based on estimates and that the total unmet needs of neighbouring authorities are currently unknown. For instance, the Housing Background Paper (January 2024) acknowledges there are significant ongoing unmet housing needs across South Hampshire<sup>1</sup>. The draft Plan does not currently account for this in its housing requirement, and while the Duty To Co-operate is set to be replaced with an 'alignment policy', national planning policy is clear that it expects any needs that cannot be met within neighbouring areas to be taken into account in addition to local housing need.

Overall, Berkeley Homes consider that the Council can and should make provision for shortfall in the wider needs of neighbouring authorities within the East Hampshire district, beyond the housing requirement that is currently identified in the draft Plan.

### **Policy S2 Settlement Hierarchy (Page 43) and Policy H1 Housing Strategy (Page 220)**

Policy S2 provides an updated settlement hierarchy to that identified in the Regulation 18 (Part 1) document, which has been revised in response to comments received to that consultation as well as by more thorough analysis in the new Accessibility Study (January 2024) which forms the first step of the new transport evidence base for the emerging Local Plan. In considering where Four Marks should sit,

---

<sup>1</sup> See Partnership for South Hampshire (PFSH) Spatial Position Statement (December 2023) available [here](#) – Table 1 which shows a total shortfall of 11,771 homes to meet housing need between 2023-36.

the Revised Settlement Hierarchy Background Paper (January 2024) informing the draft Plan explains that:

*“...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.”*

With reference to the Accessibility Study, the Background Paper also states:

*“...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”. [our emphasis]*

Taking the analysis together, the settlement hierarchy in draft Policy S2 now identifies Four Marks as one of seven Tier 3 settlements, below Alton including Holybourne (Tier 1), and Horndean, Liphook, and Whitehill/Bordon (all Tier 2).

The supporting text to Policy S2 explains that Tier 1 and 2 will be the focus of further growth, with the largest levels of growth expected in these locations. Outside of these areas, Tier 3 settlements “often provide a focal point for the surrounding villages and rural areas in terms of the provision of local services and facilities” and “although they do not have as wide a range of services as the higher order settlements (Tiers 1 & 2), they are still sustainable locations”.

Berkeley Homes would disagree with the demotion of Four Marks in the settlement hierarchy primarily on the grounds that existing services and facilities are not, in reality, accessible for many residents by means of short walking and cycling journeys and that 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. As noted in the Accessibility Study, ‘*central areas of Four Marks perform well within the Accessibility Study*’. As a consequence, the settlement is sustainable and has accessible services, but it is just that the historic form has meant that some homes are not as accessible. However, this would merely indicate a need to allocate land for new homes nearer to the centre – such as The Site.

Nevertheless, the role and recognition of Tier 3 settlements as sustainable locations for growth is supported. Four Marks is a key settlement in ‘The North’ of the District as defined by the draft Plan (as shown by the Key Diagram in Figure 3.1, Page 37), owing to the range of facilities and services available for local residents within the settlement itself (currently including – inter alia – a local shopping parade, two GP surgeries, a primary school, two nurseries/pre-schools, a pharmacy, and a village hall) and its accessible location on the A31 as a key transport corridor.

The draft Plan provides a breakdown of how many new homes are proposed to be developed by settlement (i.e. distribution of development – see Figure 12.1, Page 332) if the proposed housing allocations were taken forward. This shows that of the total 3,440 homes that are proposed to be

allocated, only 210 homes (6.1%) are located in Four Marks. This demonstrates the role and function of Four Marks as a key settlement for the surrounding area that can accommodate housing growth to meet future housing needs, but also that there should be scope to allocate more homes at Four Marks to ensure that there is a wider provision of new homes across a range of locations that could support delivery.

This is particularly important given the draft plan’s aim to provide homes for all, helping to deal with the issues of affordability and an ageing population (Objective A1). The Housing and Economic Development Needs Assessment (‘HEDNA’) (May 2022) highlights that a key driver of population change has been in the proportion of older residents, and sets out that there will be a small decrease in the younger and working age populations, but a 36% increase in the over 65-year-olds. The draft Plan therefore needs to provide for a range of homes in the most sustainable and accessible locations in the district, and it is clear that Four Marks is one such location where development would support the long-term vitality of the community, enable people to live locally, and reduce the need to travel by car.

Overall, Berkeley Homes therefore consider that there is rationale for the draft plan to support a greater level of development at Four Marks as a Tier 2 (and not Tier 3) settlement, which would better reflect the Plan’s proposed distribution of development and the settlement’s sustainability credentials.

### Site Allocations: Four Marks (Page 422)

The draft plan proposes to allocate three sites for new housing development in Four Marks, with two other sites allocated for an extension to the existing Boundaries doctor’s surgery and traveller pitches. The proposed residential allocations, totalling 210 homes, are as follows and do not include the site:

- **FMS1** – 90 homes at Land west of Lymington Barn
- **FMS2** – 20 homes at Land rear of 97-103 Blackberry Lane
- **FMS4** – 100 homes at Land south of Winchester Road

The Land Availability Assessment (‘LAA’) (November 2023) identifies Berkeley Homes’ site (ref. FM-002) as developable, with an indicative capacity of 10 dwellings and a delivery timescale of 0-5 years. All individual sites included in the LAA were subject to a further high-level assessment in the Integrated Impact Assessment (‘IIA’) (January 2024). The IIA scored each site against each IIA objective – ranging from a strong positive effect to strong negative, including mixed/uncertain – to identify at a strategic level whether satisfactory conclusions could be drawn without the need for further detailed analysis of a particular site. The table below summarises the scoring for the site and each of the proposed housing allocations in Four Marks.

Table 1 – IIA ‘Site Allocation Options, High-Level Assessment Score Summaries’ for the site and proposed allocations in Four Marks

IIA Objective Topic	FM-002 (The Site)	FM-015 (Site FMS2)	MED-022 (Site FMS1)	FM-013 (Site FMS4)
1: Biodiversity & Geology	0	0	+/-	0
2: Net Zero Carbon	++	0	++	++
3: Climate Change	0	0	0	0
4: Accessibility	+	--	--	-
5: Health & Wellbeing	++	+	+	++
6: Local Economy	++	++	++	++
7: Heritage Assets	0	0	0	0

8. Quality & Sustainable Housing	+	+	+	++
9. Landscape & Townscape	+	+	+	+
10. Natural Resources	--	--	-	--
11. Water Resource & Quality	-	-	0	-
12. Air, Noise & Light Pollution	0	0	-	-

Source: Integrated Impact Assessment for the East Hampshire Local Plan (January 2024) Appendix F

The site’s limited negative scoring as shown in the table above is associated with the site’s location within a Groundwater Source Protection Zone (SPZ) 2 and 3 and Provisional Agricultural Land Classification (ALC) Grade 3 (with one being the best quality and five the poorest quality). However, the IIA states that the reasons for rejecting the site (ref. FM-002) are: *“The site has the benefit of mature green infrastructure which would be lost if the site were to be developed. Also given the location of the site there is limited potential for an acceptable layout that is in keeping with the adjoining development”*.

By contrast, site FM-015, which lies 550m to the southwest of the site and similarly comprises a small parcel of land to the rear of Blackberry Lane (see Annex 3 appended to this letter), is proposed to be taken forward for allocation in the draft plan (site FMS2). The IIA goes on to present a series of detailed assessment matrices for ‘those preferred sites which scored most adversely in sustainability terms’ which includes the proposed FMS2 site allocation to the rear of 97-103 Blackberry Lane. This more detailed assessment also considers proposed mitigation for each objective. In summarising the reasons for the site’s allocation, the draft plan states:

*“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.”* [our emphasis]

While it is considered that there could be a case for both sites to be allocated, in line with the comments above regarding Four Marks as a key settlement for greater levels of growth, it is not clear why greenfield site FMS2 is proposed to be allocated whereas The Site which is owned by Berkeley Homes, is not. Both sites present similar constraints, yet The Site (to the southeast of 41-43a Blackberry Lane) performs stronger against a number of sustainability objectives, including net zero carbon, accessibility, and health and wellbeing (see Table 1). In particular, it is noted that the site scores significantly higher than all of the proposed housing allocations in Four Marks with regard to local active travel accessibility to daily facilities and public transport (see Accessibility Study, Appendix D – average score of 17 c.f. 11 or 8) which should be a key driver for allocations. The conclusions of the IIA and the draft Plan have also assessed site FMS2 on its potential including necessary mitigation, but does not extend the same consideration to Berkeley’s site (among others) – where the limited potential impacts identified could also be fully mitigated.

Further, the draft Plan advocates making as much use as possible of brownfield sites and/or under-utilised land in existing settlements and ensuring good accessibility to local services and facilities. The site is part-brownfield with existing un-used buildings, adjacent to and well related to the village of Four Marks and its development would support these objectives, while respecting the setting, form, and character of the settlement. Indeed, the draft Plan acknowledges that ‘backland’ development has made a meaningful contribution to the supply of housing as an efficient use of land, particularly underused gardens.

More widely, Berkeley Homes would agree with the draft Plan’s recognition (page 422) that in environmental terms Four Marks has relatively few strategic planning constraints. Albeit, as shown in Annex 2, it is constrained by the SDNP to the east, the River Itchen Catchment to the west, and some important wildlife sites (SINCs) and countryside areas across the area (none of which affect The Site). In addition, and as shown in Annex 3, there are other policy constraints such as the proposed Medstead/Four Marks Local Gap to the north which seeks to avoid actual or perceived coalescence of the settlements. This further demonstrates the relative suitability of The Site for development which is relatively unconstrained.

## **Summary**

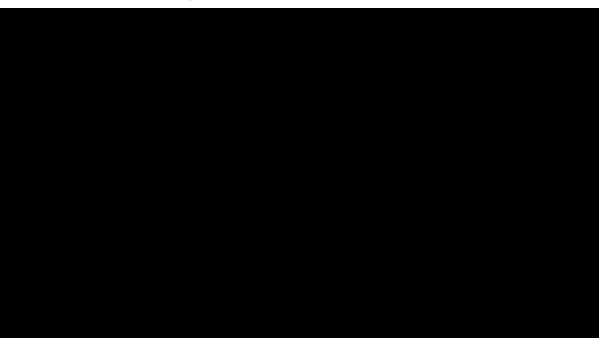
Overall, Berkeley Homes support the draft Plan’s vision and overall approach to meeting the District’s housing needs in full. Within the ambit of this overall support, we have made a number of specific comments on the current draft Plan that we trust the Council will fully consider as the Plan is worked up for Regulation 19 consultation in Summer 2024. Most notably that there are very good reasons for The Site to be allocated for housing.

Four Marks is a key settlement in the north of the district that has strong sustainability credentials, and that housing development at the underutilised site to the southeast of 41 to 43a Blackberry Lane is very accessible to the centre and could support the community and enable people to live locally. This is especially important given the district’s ageing population and environmental aims.

Berkeley Homes would welcome the opportunity to work constructively with the Council and the local community, to provide any information necessary to refine the housing strategy within the Local Plan and demonstrate that the site is a deliverable allocation that would support the need for additional housing in the district.

Should you have any queries in relation to the matters set out in these representations, please do not hesitate to contact me ([isla.bowman@lichfields.uk](mailto:isla.bowman@lichfields.uk)).

Yours faithfully



# Annex 1

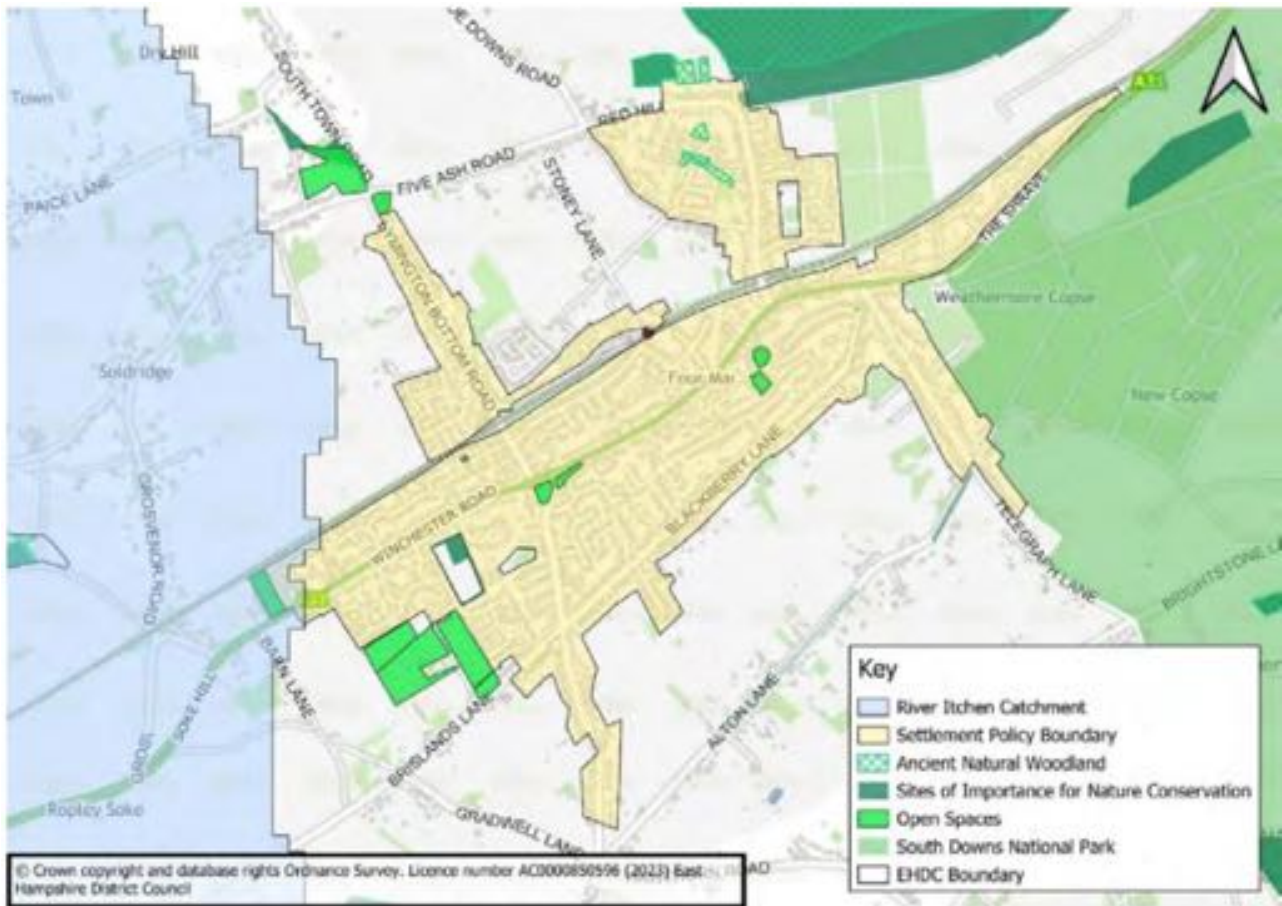
Figure 1 – Site Location Plan



Source: Berkeley Homes

## Annex 2

Figure 2 – Strategic Environmental Constraints for New Development in and around Four Marks

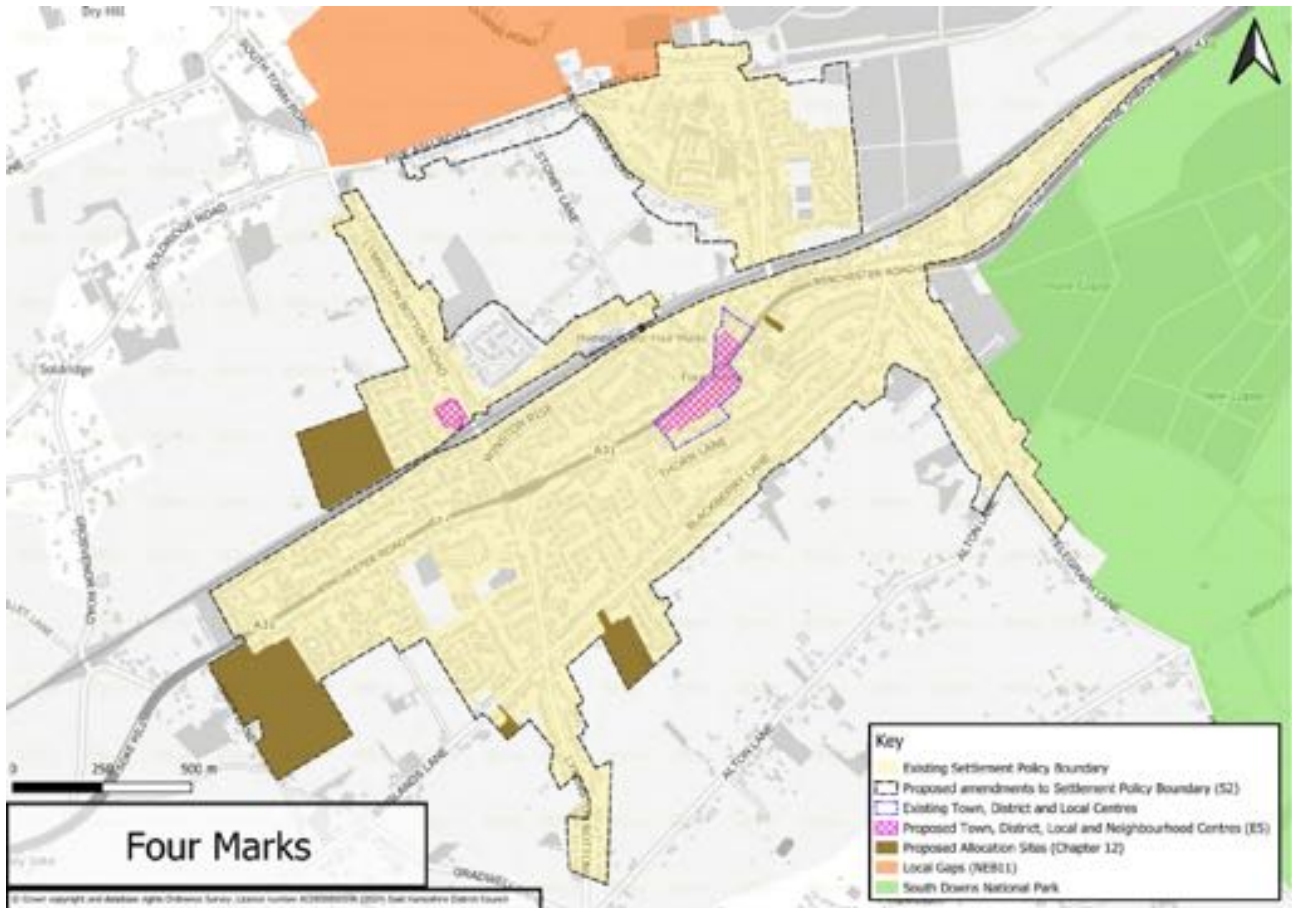


Source: East Hampshire Draft Local Plan 2021-2040 (Regulation 18) – Figure 12.20 (Page 423)



# Annex 3

Figure 3 – Draft Policies Map: Four Marks



Source: East Hampshire Draft Local Plan 2021-2040 (Regulation 18) Policies Maps